United States
Department of
Agriculture

Forest Service

Pacific
Southwest
Region

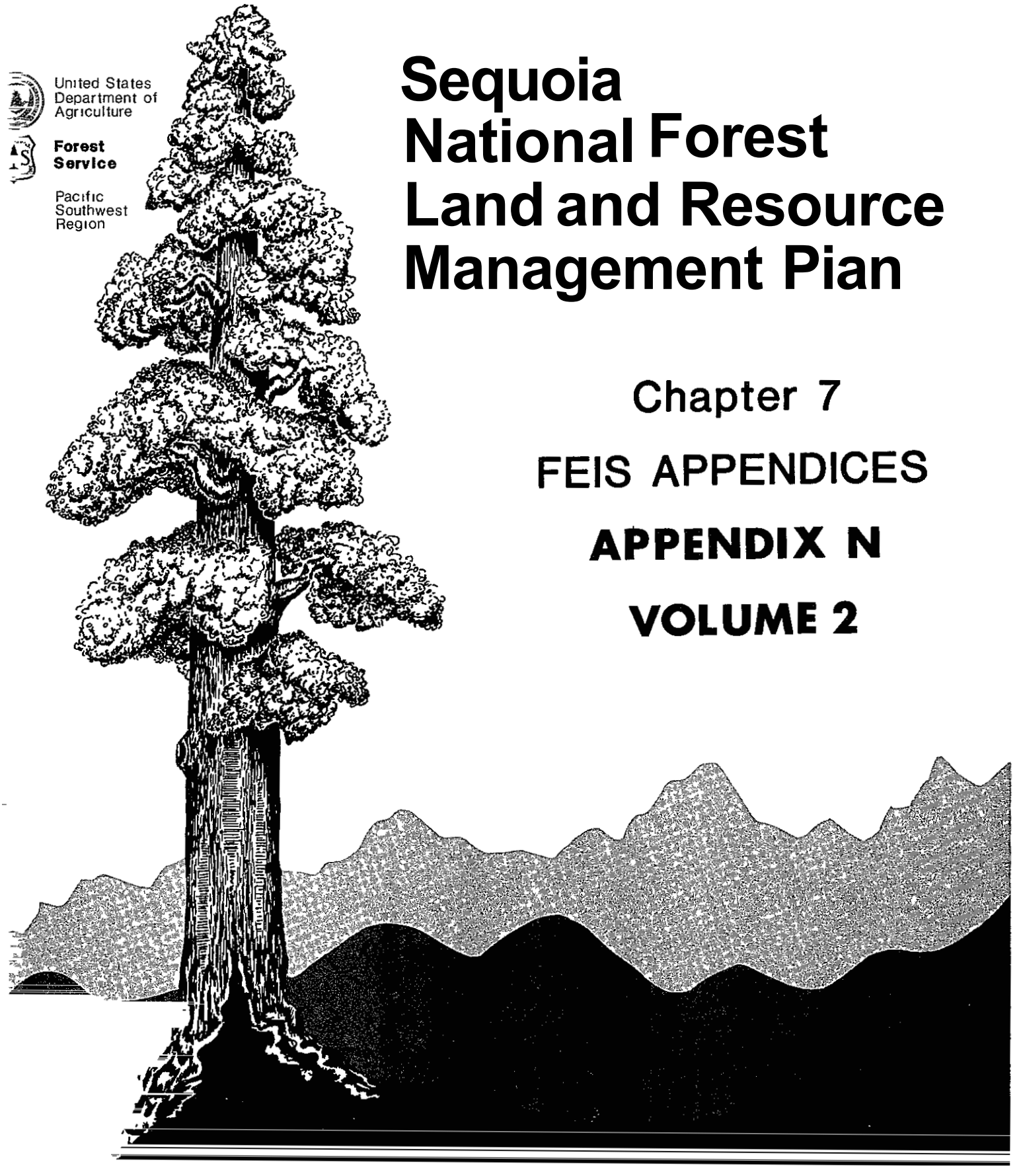
Sequoia National Forest Land and Resource Management Plan

Chapter 7

FEIS APPENDICES

APPENDIX N

VOLUME 2



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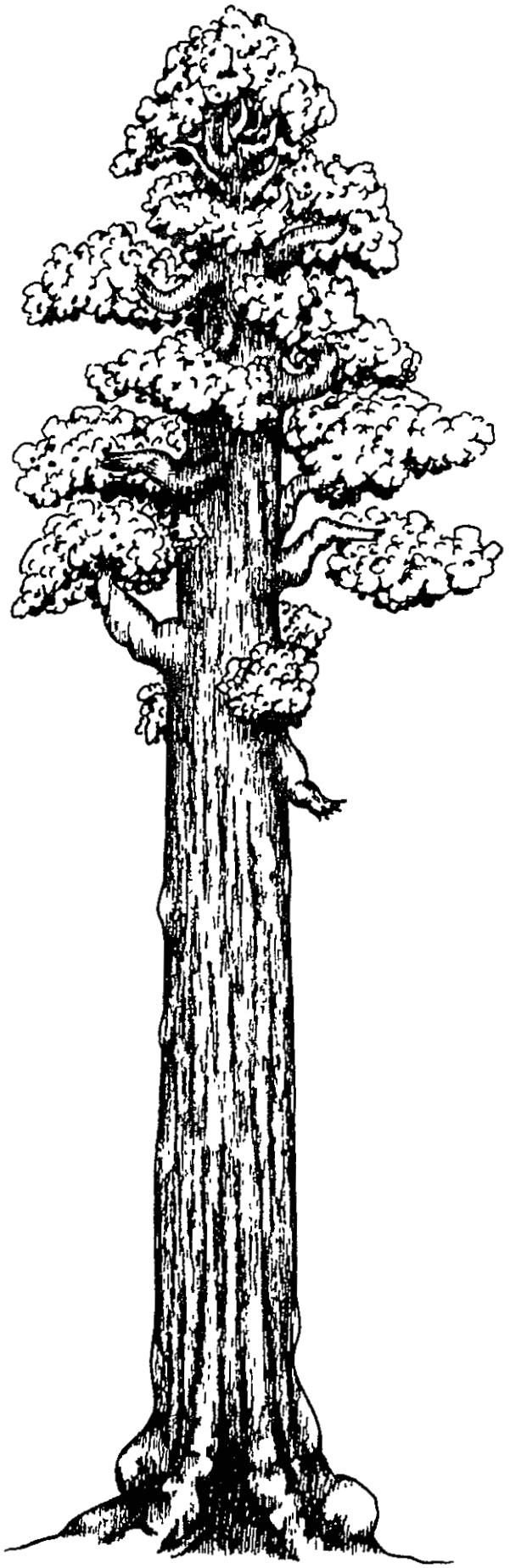


Appendix N

SUMMARY OF PUBLIC RESPONSE

APPENDIX N

SUMMARY OF PUBLIC RESPONSE TO THE DRAFT PLAN AND DEIS

Appendix N summarizes written and oral responses received by the USDA Forest Service on the Draft Forest Plan and the Draft Environmental Impact Statement (DEIS) for the Sequoia National Forest. The Plan and DEIS were distributed to individuals, interest groups, Government agencies, and other interested officials. Copies were also on loan at libraries and Forest Service offices. In addition to direct mailing, notice was given through public notification and direct contact by Forest Service Officials. Please see EIS Chapter 7, Appendix A. II Consultation with Others and Chapter 6, Consultation and Mailing List. *The* purpose *of* the public review period was to share information on the Plan and the ten alternatives presented in the DEIS. Written and oral comments from the public were considered by Sequoia National Forest Supervisor **James** Crates regarding the Final Forest Land Management Plan and Final Environmental Impact Statement.

This Summary is divided into nine sections. These sections include: (1) Summary of the Content Analysis System, (2) Demographic Characteristics of Respondents, (3) Summary of Comments by Analysis Categories, Subject Areas and Alternatives, (4) Summary of Comments on Issues, and (5) Summary of Comments on the Document and Process. Following these summaries are the detailed analyses of public comments by Subject matter areas with the Forest Service responses (6). Section 6A is the alphabetical listing of respondents. In Section 7, all letters from public agencies and elected officials are published and answered. Section 8 is the Forest Service response to the CHEC report provided by the Kern Valley Wildlife Association.

1. SUMMARY OF THE CONTENT ANALYSIS SYSTEM

A total of 2,935 responses from the public were received regarding the Draft Forest Plan and Draft Environmental Statement. The analysis of these responses was based upon standard procedures found in Forest Service Handbook 1609.13 that have been developed to summarize public comments objectively. All responses from the same individual, written or oral, were considered as one response. Incoming responses were grid-stamped and coded according to the form of response, interest affiliations of respondent, number of signatures, geographic location, and numeric respondent identifier. Preferences for each of the ten alternatives were grid-coded for each response, and the category of the Plan or DEIS commented on, subject areas discussed by the respondents, and editorial comment. Subject area comments were grouped together by the computer program. Qualitative analysis was then done using content analysis summary procedures focusing on the subject area content of comments. A comment that specifically rejected an alternative was coded "con." In addition, verbatim language pertinent to subject areas was underlined. Information included on the grids was stored as a computer data base. A software package summarized all responses including the underlined verbatim language.

All original letters and other supporting documentation to the development of this summary are available for review at the Sequoia National Forest Headquarters in Porterville, California. The Code Book developed and used

for the analysis of responses to the Draft Plan and EIS is on file and available for review at this same location. Forest Service responses to individual public letters are also trackable by respondent number and available upon request.

Eighty-eight (88) people gave oral statements at two public hearings. These were recorded verbatim by a court recorder. The typed statements were then given the same analysis as other public responses.

2. DEMOGRAPHIC CHARACTERISTICS OF RESPONDENTS

For the purpose of developing basic demographic information, responses were grouped by respondent category, form of response, and geographic location.

Respondents made an average of 2.44 comments for each response or a total of 7,163 comments.

Respondent Category	# of Comments	Percent of Total
(1) Individual	5,492	76.7
(2) Permittee	18	.25
(3) Local Agency	51	.7
(4) State Agency	184	2.5
(5) Federal Agency	104	1.4
(6) Local Elected Official	5	.0
(7) State Elected Official	4	.0
(8) Federal Elected Official	13	.1
(9) Conservation/Environmental Group	577	8.0
(10) Academic Group	25	.3
(11) Professional Society	129	1.8
(12) Civic Groups	31	.4
(13) Business Groups	118	1.6
(14) Commodity Interests	309	4.3
(15) Service Interest	17	0.2
(16) Motorized Recreation Interest	36	0.5
(17) Hiking, Riding, Bicycling Groups	12	0.1
('18) Hunting, Fishing, Sport Groups	53	0.7
(19) Minority Groups	0	.0
('20) Individual, Employee	39	0.5
(21) Tribal Government	2	.0
('22) Other	4	
TOTAL	7,163	100.0

Inputs were also grouped according to the form of their response. Comments by form of response were distributed as follows:

	# of Comments	Percent of Total
(1) Letter/Postcard	5,639	78.7
(2) Letter With Enclosure	573	8.0
(3) Form Letter	242	3.4
(4) Blank	0	0
(5) Petition	319	4.5
(6) Resolution	10	.1
(7) Documented Oral Comments	378	5.3
(8) Other	2	0
TOTAL	7,163	100.0

Using the return addresses of respondents, responses were further grouped according to geographic location. The comments originated as follows:

	# of Comments	Percent of Total
(1) Not Known	21	0.3
(2) Local	2,855	39.9
(3) Southern California Areas	2,791	38.9
(4) Northern California	1,357	19.0
(5) Out of State	139	1.9
TOTAL	7,163	100.0

3. SUMMARY OF COMMENTS BY ANALYSIS CATEGORIES, SUBJECT AREAS, AND ALTERNATIVES

A. Analysis Categories

The comments were divided into seven analysis categories. Each response comment was coded to a particular category as follows:

(1) ALTERNATIVES

(comments on the Alternative Development Process, the creation of additional alternatives, the alternative selection process, or preference for a particular alternative and land allocations).

(2) FOREST ISSUES

(mentions the original issues development process, the issues as stated in the EIS, or discusses a comment submitted during the initial comment period).

(3) ENVIRONMENTAL CONSEQUENCES

(specific comment on the consequences as written in the documents).

(4) PUBLIC INVOLVEMENT

(addresses the public involvement process).

(5) GENERAL

(general concern about the management of a particular resource without being specific to a particular part or aspect of the planning document, also includes FORPLAN Analysis, and Management Area Prescriptions and/or Practices).

(6) ANALYSIS OF THE MANAGEMENT SITUATION OR AFFECTED ENVIRONMENT

(comments on background information, assumptions used in the Analysis of the Management Situation for the resource elements).

(7) PLAN AND MONITORING

A numerical summary of response comments by these categories are:

	Comments	Percent of TOTAL
(1) Alternatives	1,978	27.6
(2) Forest Issues	15	0.2
(3) Environmental Consequences	49	0.7
(4) Public Involvement	29	0.4
(5) General	1,704	23.8
(6) Analysis of the Management Situation or Affected Environment	252	3.5
(7) Plan and Monitoring	3,136	43.8
TOTAL	7,163	100.0

B. Subject Area

Each pertinent comment was underlined in the Response, inputted into the computer, and given a theme subject area code as well as sub-theme codes. These subjeit area codes are:

			Numerical Summary	
Code	Subject Area	Definition	# of Comments	Percent of Total
010	SOCIAL ENVIRONMENT	Social System, Mentioning "Social"	25	0.3
020	ECONOMICS, GENERAL	General Reference to Economic System, Jobs	140	2.0
021	ECON. VAL. OF FOREST	Economic Value of Forests (makes reference to forest as having economic value)	249	3.5
022	RECEIPTS TO COUNTIES	25% Receipts to Counties. Reference to Schools & Taxes	21	0.3

040	AIR QUALITY, GENERAL	Restricted Air Space, Air Pollution, Noise Pollution	20	0.3
049	BIOLOGICAL DIVERSITY	Specifically States	23	0.3
050	VEG. DIVERSITY, GEN.	Vegetation Diversity, General, Specifically State	16	0.2
051	OLD GROWTH FORESTS	Giant Sequoia Management or Old-Growth Timber.	83	1.2
060	FACIL. GEN.	Facilities, General, F.S. Administrative Facilities	2	0.0
061	FOREST SERVICE ROADS	Existing	34	0.5
062	RD CONSTR CUR UNRDED	Road Const. in Areas Currently Unroaded (nonexisting)	74	**1.0**
065	TRAILS	Discussion of Existing or Nonexisting (PCT)	141	2.0
070	FIRE & FUELS, GEN.	Fire Management, Prescribed Burning	23	0.3
081	FISH, GENERAL	Fisheries Management	48	0.7
084	OTHER MGT.INDCTR.SP.	Other Management Indicator Species	39	0.6
085	OTHER WL SPECIES	Other Wildlife Species	208	2.9
086	SPOTTED OWL		46	0.6
092	T&E SPEC.(FAUN&FLOR)	Threatened & Endangered Species (Fauna & Flora)	37	0.5
096	SENSITIVE PLANTS		38	0.5
111	HERBICIDES	Includes Chemical Treatment in General	23	0.3
120	GEOL. & SOILS, GEN.	Geology & Soils, Erosion, General	21	0.3
130	HIST.& CULT.RES.,GEN	Historical & Cultural Resources, General	31	0.4
140	ENERGY, GENERAL	Geothermal, Wind Devices. Biomass	16	0.2
150	LANDS, ONRSP.ADJ.GEN	Ownership Adjustment, BLM Interchange, Acquisition, Exchange, General	28	0.4
151	HYDROELEC. DEVEL.	Hydroelectric Development	124	1.7
153	OTHER SPECIAL USES	Recreation Permits: Residences, Concessionaires, Rights-of-way	8	0.1
154	OCCUPANCY TRESPASS	and Urban Interface	4	0.1
165	LAW ENFORCEMENT, GEN	Policing Forest, Patrolling	3	0.0
170	MINERALS & MINING,GEN.		42	0.6
180	RANGE, GENERAL	Grazing	250	3.5
190	RECREATION, GENERAL	Includes Interpretation	82	1.1
191	DEVELOPED RECR.GEN	I.S., F.S. Campgrounds Picnic Sites. Vistas, Beaches	21	0.3
192	DISPERSED REC.GEN.	Camping, Hunting, Fishing, Snow Play, Beaches, Riding, Backpacking, Hiking, Target Shooting	87	1.2
193	OHV USE		508	7.1
194	SNOMOBLES. C/C SKIING	Snowmobiles, Cross-Country Skiing	22	0.3
195	SKI AREAS (DOWNHILL)	Development or Current	151	2.1

196	WHITEWATER BOATING	Rafting, Kayaking, Tubing, Canoeing	17	0.2
198	ROS (REC OPNTY SPCT)	See Definition in EIS Glossary.	3	0.0
199	WILDERNESS AREA MGMT.	Existing Areas	18	0.2
210	SPEC. INTR. AREAS. GEN	Special Interest Areas, General, Botanical Areas	21	0.3
211	RESEARCH NAT. AREAS	Research Natural Areas,	21	0.3
212	SPEC. INTR. AREAS	Specifically (RNA) Special Interest Areas, National Natural Landmarks	2	0.0
230	TIMBER, GENERAL		929	12.9
231	SILV. METH. (INCL. CC)	Silvicultural Methods, including Clearcutting	335	4.7
232	BELOW COST SALES	Referring to Timber Sales Losing $ for Government	114	1.6
235	TIM VALUS IN UNRD AR	Timber Values in Unroaded Areas	4	0.1
260	VEGETATIVE TYPES, GEN	Meadows Management	29	0.4
261	CHAPARRAL	Any Comment About Chaparral, Brush	6	0.1
270	VISUAL RES., GENERAL	Scenery	75	1.0
280	WATER, WATERSHED, GEN	Including Flood Control	55	0.8
289	GROUNDWATER	Being Specific to Groundwater	0	0
291	WATER RIGHTS	Specific to Water Rights	12	0.2
295	RIPARIAN AREAS, GEN	Areas Along Streams Spoken to Directly	40	0.6
300	WILD & SCENIC RIVERS	Existing or Potential	804	11.2
320	WILDERNESS, GENERAL	(BLM Potential Wild Area Rockhouse)	184	2.6
340	POTENTIAL WILD., GEN	Potential Wilderness, General, Roadless Areas	263	3.7
370	OTHER COMMENTS	Multiple Use, General	63	0.9
400	PLAN IMPLEMENT		1492	20.8
			7175*	100.0

*-A few comments were split into two comments in the synthesis process.

C. Alternatives

Opinion of each comment was coded in favor of or against, and inputted into the computer program. Respondents most often stated their opinion only once in their response. This opinion then applied to all comments in that response unless otherwise noted.

These identified alternative opinions were as follows:

	Numerical Summary	
	# of Comments	Percent of Total
(1) In favor of a particular aspect, practice, activity or use. (Alternative preference not stated.)	3,100	43.3

(2) Against a particular aspect, practice, activity or use. (Alternative preference not stated.)	1,803	25.2
(3) Opinion not expressed or cannot be discerned.	466	6.5
(4) New Alternative recommended and described.	1,171	16.4
(5) FAVOR PREFERRED (PRF) Alternative.	45	0.6
(6) FAVOR PREFERRED (PRF) Alternative with modifications.	137	1.9
(7) AGAINST PREFERRED (PRF) Alternative (no other alternative preference given).	234	3.3
(8) FAVOR CURRENT (CUR) Alternative.	3	0.1
(9) AGAINST CURRENT (CUR) Alternative.	0	0.0
(10) FAVOR CURRENT (CUR) Alternative with modifications.	11	0.2
(11) FAVOR 1980 RPA Alternative.	9	0.1
(12) AGAINST 1980 RPA Alternative.	0	0.0
(13) FAVOR 1980 RPA Alternative with modifications.	10	0.1
(14) FAVOR AMENITY (AMN) Alternative.	17	0.2
(15) AGAINST AMENITY (AMN) Alternative.	12	0.2
(16) FAVOR AMENITY (AMN) Alternative with modifications.	25	0.3
(17) FAVOR CURRENT, ECONOMIC DISPERSED (CED) Alternative.	1	0.0
(18) AGAINST CURRENT, ECONOMIC DISPERSED (CED) Alternative.	0	0.0
(19) FAVOR CURRENT, ECONOMIC DISPERSED (CED) Alternative with modifications.	0	0.0
(20) FAVOR LOW BUDGET (LBU) Alternative.	3	0.1
(21) AGAINST LOW BUDGET (LBU) Alternative.	0	0.0
(22) FAVOR LOW BUDGET (LBU) Alternative with modifications.	5	0.1
(23) FAVOR MARKET (MKT) Alternative.	78	1.1
(24) AGAINST MARKET (MKT) Alternative.	0	0.0
(25) FAVOR MARKET (MKT) Alternative with modifications.	9	0.1
(26) FAVOR HIGH PRODUCTION EMPHASIS (PRO) Alternative.	3	0.1
(27) AGAINST HIGH PRODUCTION EMPHASIS (PRO) Alternative.	1	0.0
(28) FAVOR HIGH PRODUCTION EMPHASIS (PRO) Alternative with modifications.	0	0.0
(29) FAVOR WILDERNESS/CAPITAL INVESTMENT (WLI) Alternative.	0	0.0
(30) AGAINST WILDERNESSICAPITAL INVESTMENT (WLI) Alternative.	0	0.0
(31) FAVOR WILDERNESSICAPITAL INVESTMENT (WLI) Alternative with modifications.	0	0.0
(32) FAVOR WILDLIFE, FISH & VISUAL EMPHASIS (WFV) Alternative.	3	0.1

(33) AGAINST WILDLIFE, FISH & VISUAL EMPHASIS (WFV) Alternative.	1	0.0
(34) FAVOR WILDLIFE, FISH &VISUAL EMPHASIS (WFV) Alternative with modifications.	3	0.0
TOTAL	7,150*	100.0

- This does not add up to 7,163 since some comments had no opinion.

4. **SUMMARY OF COMMENTS ON ISSUES**

Computer summaries were made of each subject area code.

Each of these summaries was synthesized by (1) eliminating redundant comments: and/or (2) creating paraphrases that included the specific comments found in the comments for that subject area.

These synthesized comments were then given to resource management specialists. They read all the synthesized comments and, in many cases, the original letters.

The specialists then developed 32 issue statements. These issue statements contained a definition of the issue, a summary of public input, background information, how the issue was handled in the DEIS. and options for resolution.

Those issues were as follows:

1. Air Pollution/Acid Rain
2. Below Cost Sales
3. Budget
4. CAS Landbase
5. Classification of Kings River
6. Clearcutting
7. Coordination With Other Forest Plans
8. Economic Values-FORPLAN
9. Giant Sequoia
10. Hydropower
11. Livestock Grazing
12. Management of Developed Sites
13. Minerals Policy Statement
14. Monitoring
15. Off-highway Vehicles
16. Pesticides
17. Research Natural Areas and Special Interest Areas
18. Road Closure
19. Road Construction
20. Scope and Intent of LMP
21. T & E Species Issue
22. Timber Management for Recreation
23. Trail Emphasis
24. Visual Resources
25. Volume of Harvest
26. Wild & Scenic Rivers - Kings

27. Wild & Scenic Rivers - Lower Kern
28. Water Quality
29. Wilderness - How Much?
30. Wildlife Biologists
31. Cross-Country vs. Snowmobiles
32. Fish & Wildlife

The Forest Management Team then reviewed these issue statements and narrowed them to 12 major issues using the following criteria:

1. Was there a major public concern?

2. Was the issue of concern to major public agencies?

3. Could the issue be resolved within the Forest Plan?

4. Would resolution of the issue result in major changes in management direction, land allocation, or resource outputs?

The major issues and summary of public input are:

(1) BUDGET

ISSUE: Is there too great a discrepancy between current and projected budget levels required to implement the Preferred Alternative (PRF)? Will substantially lower budgets substantially change resource programs and their priorities?

PUBLIC INPUT SUMMARIZED: Respondents are concerned that present budget levels ($10.6 million in 1986) fall so far short of the level required to fund PRF ($19.5 million) or even LBU ($12 million) that there will be major changes in the implementation of PRF or any of the other alternatives. Respondents would like to know how we would prioritize budget expenditures for the various resource programs if the selected alternative is not fully funded. There is much concern that recreation, wildlife and other non-timber programs would suffer disproportionately and that monitoring might be abandoned altogether.

(2) CLEARCUTTING

ISSUE: How should the silvicultural practice of clearcutting be applied on the Forest?

PUBLIC INPUT SUMMARIZED: Public input is polarized on this issue. Many said that clearcutting is ecologically destructive because a reduction of ecosystem complexity in the managed, even-aged stands would make the forest more susceptible to unknown virulent pests. Some perceived that a monoculture of tree species would result from clearcutting. This, with the loss of multi-aged stands, would reduce forest stability even more than clearcutting alone. Some thought that clearcutting would cause an increase in soil erosion and an inability to reforest resulting in a reduced long term sustained yield. Some said that clearcutting was not a good economic

choice because all trees, including small, low valued ones are removed at the same time as larger, more valuable ones. Many people objected to the major changes in the landscape when clearcutting is visible.

Other comments supported even-aged management and the use of clearcutting as a tool because of increased water yield; and greater productivity and cost effectiveness. Other interests supported much higher annual timber harvests. They did not mention clearcutting as being a problem in achieving those higher harvest levels.

(3) FISH AND WILDLIFE

ISSUE: Will the management of fish and wildlife habitat be adequate in light of increases in commodity production?

PUBLIC INPUT SUMMARIZED: Respondents said the documents were not in compliance with the law or FSM because they did not treat this resource equally with other resources. Individuals and agencies said that monitoring, particularly of potentially damaging management activities, was not sufficient or that it would not be carried out. Others said the substantial reduction in Fish and Wildlife personnel and budgets would not allow maintenance of viable populations of all species over time. Some said that unique areas and biological diversity were not properly addressed or protected. Comments reflected a mistrust of intentions and ability to adequately protect riparian areas. Respondents showed a knowledge of the importance and value of riparian areas: and, generally, encouraged adoption of more protective measures.

(4) GIANT SEQUOIA

ISSUE: What should be the objectives and intensities of management activities in giant sequoia groves?

PUBLIC INPUT SUMMARIZED: Respondents had a wide range of opinions on giant sequoia management. They had concern that management activites, particularly logging within giant sequoia groves, would endanger this species. Many respondents said that intensive management of any kind was inappropriate because of the unique features of the species and their ecosystems. Some said that a comprehensive Forest-wide giant sequoia grove plan was necessary prior to any further activity. Some supported action described under the Preferred Alternative (e.g., logging of whitewoods to protect the sequoias from fire). This would secure reproduction and increase the vigor of residual trees.

(5) OFF-HIGHWAY VEHICLES

ISSUE: How much and where should OW use occur?

PUBLIC INPUT SUMMARIZED: Comments were generally polarized as being pro-OW or anti-OW. Pro-OHV comments were nearly all from users desiring to protect and improve their activity. Most favored expanded trail

systems, and emphasizing loops and connecting trails. Some specifically support more cross-country travel acreage. Interest was overwhelmingly for trail riding rather than cross-country use. Most opposed recent wilderness designations and effects on OHV trails. Some said that the 24 percent of the Forest in wilderness only produces 4 percent of the recreation use.

Anti-OHV comments said that OHVs are not compatible with other Forest uses due to user conflict and environmental damage. Specific concerns were noise, dust, trail damage. erosion, watershed damage, disturbance of wildlife, destruction of plants, air pollution, public safety, government liability. taxpayer-expense, fire hazards, law enforcement costs, litter, and vandalism. Some favored restricting OHV's to fewer miles of designated roads and trails. Others proposed a few small OHV "sacrifice areas" in non-environmentally sensitive locations. A number said OHV's should be allowed only on roads, subject to the same restrictions as other vehicles.

A few respondents suggested a middle ground. They proposed OHV's only on designated roads and trails (no cross-country travel). They would Combine these roads and trails with a trail system developed specifically for OHV's from Green Sticker programs.

(6) PESTICIDES

ISSUE: Are pesticides necessary to ensure long-term sustained yield? Are they safe?

PUBLIC INPUT SUMMARIZED: Several letters pointed out that all alternatives in the DEIS assume the use of pesticides to achieve the necessary timber growth to support long-term sustained yield. These letters suggested that the Forest Service should develop alternatives which deal with the possibility of pesticides not being available for use in forest management. Many suggested that a separate EIS was needed before the use of pesticides continues. Many others expressed a fear of either undesirable direct effect on human health or indirect ecological impacts resulting from the use of pesticides. On the other side of the issue. there was general support for the application of intensive forest management practices, including the proper use of pesticides. Many respondents favored the timber outputs of the PRF Alternative, or even greater outputs, and did not mention the use of pesticides as a problem. By implication, then, these individuals accepted pesticides as a part of timber management.

(7) ROADS

ISSUE

Road Construction: What are the road needs for use of Forest resources?

Road Closures: What are the situations, if any, for road closure?

PUBLIC INPUT SUMMARIZED

Road Construction:

Some respondents said that the Forest has sufficient road access. In general many said that new roads are not necessary for recreation and that timber should support road construction costs. They said an unequitable balance exists between road construction and hiking trail construction. Several respondents had concern over road construction near wilderness. They expect that additional roads would result in increased wilderness use (contrary to the wilderness experience). Several comments wanted unroaded areas as semi-wilderness or buffers to wilderness.

Some respondents favored a slower, more limited approach to future road construction that would allow for a more comprehensive impact assessment. Some wanted temporary timber harvest roads and restoration to a more natural condition after use. Environmental concerns focused on effects on water quality, air pollution, congestion, biota damage, erosion, and visual degradation.

Road Closures:

Respondents were divided equally into conflicting positions. Those in favor of leaving roads open said that more roads should be left open after posting health and safety considerations, that taxes pay for the roads and, therefore, they should be available for use. that more available roads will provide better access to remote areas, and that roads allow a more remote experience for those with hiking disabilities.

Those in favor of road closures want an increase in road obliterations and restoration to natural conditions. They said this would reduce soil erosion and user impacts, and have less impact on biota and visuals. They wanted a road obliteration plan included in the Forest Plan and consideration be given to establishing further roadless areas through road obliteration.

(8) TRAILS

ISSUE: Does the DEIS and Plan have enough emphasis on the total trail system including construction and trail maintenance?

PUBLIC INPUT SUMMARIZED: Most respondents said that new construction of 21 miles of trail per decade in the Preferred Alternative (PRF) is inadequate to meet demand. Many compared this figure to information about road construction in the Preferred Alternative. They did not identify any specific areas not presently accessed by trails. Some respondents wanted more reconstruction and maintenance of existing trails. They discussed the poor condition of trails. Many respondents, representing both motorized and nonmotorized user interests, had concern about impacts of timber management on recreation values (e.g., visual quality) and investments (e.g., the actual trails), often relating to past practices and to projected impacts under the Preferred Alternative. They often said that timber harvest and associated road construction have destroyed many miles

of trail. Frequent concerns were about slash left on trails and building roads over trails without providing for trail rerouting.

(9) VISUAL RESOURCES

ISSUE: How can management practices best maintain visual resources, especially in areas of high visual interest?

PUBLIC INPUT SUMMARIZED: Many respondents oppose activities that would create a managed appearance resulting from continued even-aged silvicultural treatments. They want to avoid a decline in the Visual Quality Index (VQI). Instead, they believe the Plan needs to enhance and improve the current visual condition. Some say that past emphasis on logging and road construction resulted in visual degradation which angered people nationwide. They state that the effects of Forest activities, when analyzed by viewsheds, will create a continuous and long-term visual quality decline. Some express concern that Forest Plan short-term impacts would actually last many years (e.g., 40-50 years). Some questioned why the Plan proposes the Modification objective within the urban interface zone. Others had concern about borders between National Forest and National Park land, or between wildernesses and non-wilderness areas. They see a need for a compatible visual relationship between the two. They state that the Modification objective is inconsistent along these boundaries.

Other respondents supported higher annual timber harvests. They concur with requests of the industry, saying that timber is a renewable resource and that harvesting benefits the land and its resources. Many did not mention visual quality as being a problem in achieving these higher levels of harvest, implying that the higher outputs could be achieved without detrimental effects on the visual resource. Some say that through proper management, the Forest can provide timber production and still insure multiple-use. Others say that aesthetic values can be maintained and trees can be planted to provide for the future.

(10) VOLUME OF HARVEST

ISSUE: What should the Allowable Sale Quantity (ASQ) be for the Forest?

PUBLIC INPUT SUMMARIZED: Various concerns criticized the volume of timber harvest in the Plan. Input was generally polarized. Many said the PRF was generally too high or too low.

Respondents gave diverse reasons why the Allowable Sale Quantity under the Preferred (PRF) Alternative is too high. They said that budget levels needed to produce this harvest are unrealistically high. They saw an undesirable subsidy to the timber industry which would result because revenues from the sale of timber would not cover all costs to the government. They also objected to the use of large amounts of pesticides to maintain long-term sustained yield, and to harvests planned on land only marginally capable of intensive forest management. More land allocated to activities other than timber production was requested.

Conversely, other respondents said that the Allowable Sale Quantity under the PRF Alternative was too low. They wanted more of the land base committed to timber management. They stated a desire to maintain at least the current level of harvest even though less intensive timber management may result from a permanent prohibition of herbicide use. Others said that harvest levels under the PRF Alternative would suppress the growth of the local wood industry.

(11) WILD & SCENIC RIVERS - KINGS RIVER

ISSUE: Should Segment 1 of the Kings River receive a Wild and Scenic River classification?

PUBLIC INPUT SUMMARIZED: Many had opinions that the Plan should not delay recommending Wild & Scenic River status on Segment 1 of the Kings River. Respondents want preservation/protection of the existing character of the river and canyon via designation under the Wild & Scenic River Act as a means to prevent a dam at Rodgers Crossing. Primarily, these respondents said the River has recreation and other potential far outweighing potential for a dam with its associated values. In not addressing the suitability and eligibility of this portion of the River, these people said the Plan fails to meet its intended purpose. They have concern about fragmented planning (relative to other segments of the River). The respondents often mentioned that the River has the widest range of remarkable values of any Sierra Nevada river, including magnificent scenery, superb wildlife habitat, blue-ribbon fishing, and easy access to hundreds of thousands of visitors.

Letters said that a decision had already been made to construct a dam at Rodgers Crossing. and expressed disagreement with this position. Similarly, some said it would not be appropriate for the Forest Service to use data and information from dam proponents due to bias in favor of a dam (and against maintaining status quo or Wild & Scenic River designation).

Other respondents said they favor completion of additional studies before a decision by the Forest Service is made either way for a dam or for designation as a Wild & Scenic River. Some occasionally mentioned the unavailability of current information. Enactment of Wild and Scenic River. Legislation (November 1987) has resolved this issue.

(12) WILDERNESS

ISSUE: What are the recommendations for wilderness classification?

PUBLIC INPUT SUMMARIZED: Responses ranged from a desire for maximum wilderness to no more wilderness. Wilderness advocate recommendations ranged from adding a single Further Planning Area to keeping all former inventoried roadless areas (Rare 11) as wilderness, or at least Semi-primitive Non-motorized ROS class. The stated purposes were preservation for future generations, maintenance of ecological and species diversity, and space for mental and spiritual relaxation. Those opposed to any additional wilderness say designation is too restrictive, costs are

high due to the reductions in commodity outputs and/or management, too much land is already set aside for too few users, California has enough wilderness.

Resolution of these illustrative issues/comments are part of the Record of Decision. Comprehensive treatment of public responses and Forest Service Resolution follows in Sections 6, 6A. and 7.

5. SUMMARY OF COMMENTS ON THE DOCUMENT AND PROCESS

A. Listed here is a summary of Major Public Comments on the Documents.

Alternatives were confusing to the primary issue of developing a sound management plan. The Plan should have had an alternative between 146 and 186 MMBF annual timber harvest. The data base is flawed, assumptions incomplete and alternatives inadequate. FORPLAN assumptions are false. The process and reasons for selecting the preferred alternative are not shown. Use of acronyms is confusing. Economic relationships with neighboring National Forests and counties are insufficient. Minority population percentages are inaccurate for Kern County.

MMRs and MIR's should not be imposed on all alternatives. The Plan violates NEPA by not including alternative MMRs and MIR's. Cost of MMRs and MIR's should be shown.

Pertinent legislative mandates for cultural resources are not discussed. Needs a reference in the text referring to these mandates in the Glossary. Glossary needs to have a definition of an archaeological site. The documents need to study the eligibility and suitability of Kings River for Wild and Scenic potential.

The mitigation of timber impacts on trails needs a better explanation. The documents should have an element addressing user conflicts and how they will be managed. Recreation demand should be expressed as a demand for each ROS class rather than demand for dispersed and developed recreation. Environmental consequences of an alternative on wilderness resources should include more issues than impact on users and others. It should also consider consequences on the natural values.

Goals and objectives for all T&E candidates, sensitive, and declining species should be developed. The documents need to outline plans for surveying and inventorying these species. Individual management plans should be written for each sensitive plant and animal species. The Plan needs to utilize the Natural Diversity Data Base (11DB) assembled by California Department of Fish and Game. The Plan does not describe and direct fisheries habitat improvements except for the Little Kern golden trout. Cumulative multiple-use impacts on fisheries should be addressed. Indicator species do not adequately represent all rare species. The vision statement needs to recognize wildlife benefits.

The Plan does not provide information on individual giant sequoia groves. A decision on Research Natural Areas needs to be made in the

Plan. Cumulative impacts of timber management should be more fully discussed in prescriptions. Uneven-aged management as a Timber Management alternative should be given greater consideration. The Plan fails to examine alternatives for assumptions about stand growth discount rates, and stumpage price trends. This violates NFMA regulations. The loss of herbicides should be an integral part of at least three alternatives or in the analysis of alternatives.

The Plan lacks adequate data for site productivity or erodibility of soils, and needs a soil loss table along with Table 4.15.

The Plan should show purpose, method, and use of the geologic resource inventory.

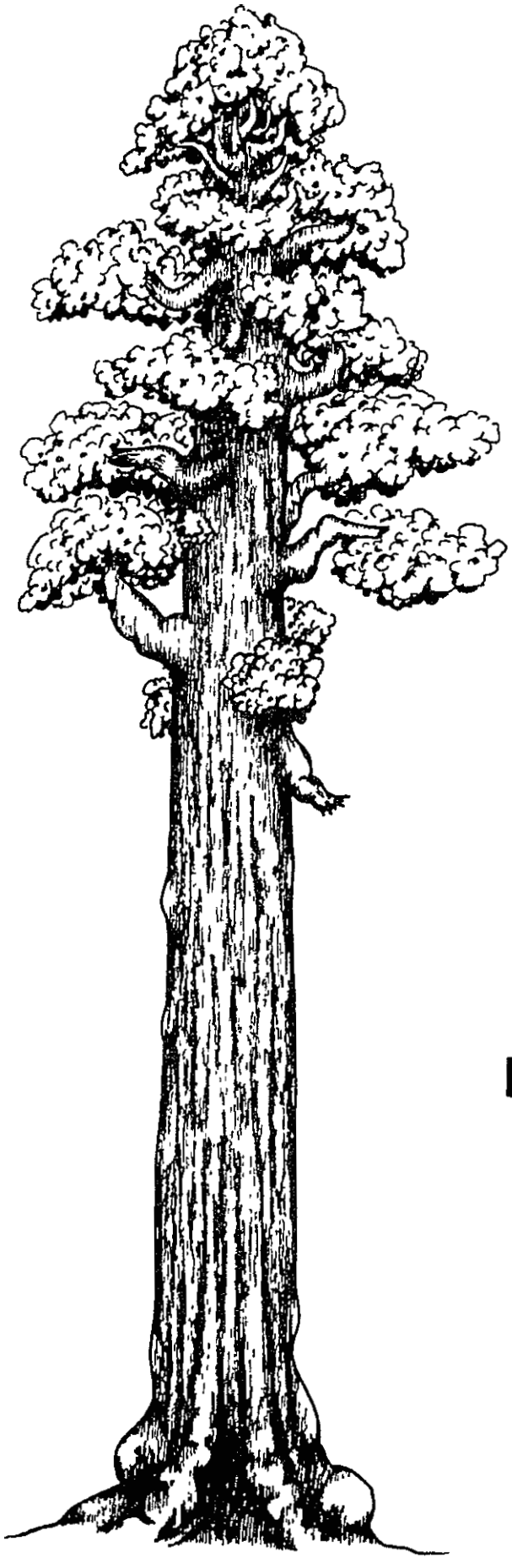
B. Summary of Public Comments on the Public Involvement Process

Some respondents asked for extension of time to adequately comment on the Draft documents, and for public hearings and additional public meetings. Others asked that no extension be considered.

Several respondents stated that the bureaucratic language, writing of the documents, and lack of specifics was misleading, poorly written, and easily misunderstood. Others congratulated the Forest Service about the compilation of data, information and organization of the Documents.

Other concerns were that consultation with the California Department of Fish and Game should be shown, the Forest Service should make sure all of the varied interests had an opportunity to provide their comments, and that more public involvement should occur before completion of Giant Sequoia Groves Management Plans.

Comprehensive treatment of these illustrative public comments about the documents, planning process and the public involvement process follow in Sections 6, 6A, 7, and 8.



Section 6

RESPONSE TO PUBLIC COMMENTS

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 You are restricting the lumber industry Plan will create havoc for the lumber industry. their families. with the building Industry. lumber prices, interest rates and people of the USA Through rotation, planning and cultivating. the end result is bountiful harvest Reasonable prices and profit If we use logic we can benefit through managed tree farming Balanced usage is the answer Triple the planting	Please see Chapter 4 B 1 (FEIS) for a discussion of socio-economic effects, and Appendix O (FEIS) for a discussion of timber supply
ZOO The SQF budget has shrunk from $18 million 4 years ago to $9 8 million this coming year. and national deficit reduction efforts make realistic prospects for increased funding unlikely Yet each of the 10 alternatives discussed in the DEIS projects a budget higher than this level (and m the case of the PRF. much higher) The Conservation Alternative recommends that the problem of significantly reduced funding be realistically addressed for each alternative. that specific potential program cutbacks be delineated in each case. and that retention of resource protection programs be given a higher priority than that of resource exploitation programs such as timber harvesting	Please see Appendix L (FEIS) for a discussion of the relationship between the annual budget and the Forest Plan
300 The 5th decade budget IS wrongly shown at 19 6 million dollars' That is the second decade budget'	Thank you for spotting this error
301 The idea that total clearcuts are healthy because new grasses and the succession of plants that follow Creates good deer habitat is IRRESPONSIBLE MANAGEMENT The agency which is looked at as caretaker of our forests must begin to honor the basic concept of interdependency of species -- all species -- by providing. also. for animals that are not "harvested " The idea of Cutting 10-25 cords of black oak per year being advantageous to wildlife *(3-42)* would be difficult for you to substantiate. given the fact that representatives of the California Department of Fish and Game claim just the opposite. after careful studies	We are not advocating that total use of clearcuts on all ground is best for any species Just as total retention of old growth is not best far wildlife diversity either Clearcuts do offer grasses and shrubs during part of the cycle This provides habitat. forage. and diversity important to some species The Forest has set aside approximately 24% of the land base (almost 35% of the timber base) in wilderness This provides habitat for species dependent on mature seral stages Special Interest Areas. Research Natural Areas. old growth retention. spotted owl habitat areas, view zones. and riparian areas also provide areas of minimal disturbance to wildlife The needs of wildlife are also provided for with retention of dead and down wood, snags. and wildlife clumps within timber emphasis zones The Plan States that 10-25 cords per acre of oaks can be Cut and still maintain habitat for wildlife In some areas, cutting oaks to thin the trees to encourage sprouting and the development of large mast producing trees does benefit wildlife

400 Using national forest land to increase the economy in an exploitative way is counterproductive

This statement is too general to respond to other than to note that in our opinion the conservation, or wise use, of natural resources is not an exploitive use of them

500 Our forest resources should never be sacrificed for the profit of private individuals Even those timber sales which "break even" amount to a give-away of our property No timber should be sold for less than the administrative cost and the costs of repairing all the damage done The same goes for cattle grazing and other commercial uses of our forest Your plan should State these objectives in clear and unmistakeahle terms Neither your Preferred Alternative nor any of the others give us a fair return far the resources lost

The modeling process described in Appendix B of the EIS allows all lands to be available for all uses. within constraints imposed by the theme of each alternative The computer model. FORPLAN. then solves far the particular allocation of resource uses that produces the maximum present net value In this process non-financial values. such as wildlife and/or wilderness experience. are evaluated and chosen to the extent that they contribute more to public benefits than do values with a financial return In this method of resource allocation the intent of the 1960 Multiple-Use Sustained-Yield Act is fulfilled Multiple-use is optimized, but few. if any. specific uses are maximized We have also added a discussion on "below-cost sales" in Chapter 3 of the FEIS

600 The numbers are in the tens of millions of board feet of timber. or dollars repeated in future profits. or current and projected federal budgets Much of this data can he gone over and tightened up It would appear that today's rancher is an absentee landlord or syndicate and our public lands are being used strictly for business The same could be said for ski lodge operations There has to be a limit to exploitation of open spaces & the wilderness especially when it is subsidized at taxpayer expense

See the answer above While it is true that commercial uses of National Forest land are allowed. they are carefully regulated to ensure protection and productivity of the Forest's natural resources and compatibility with other uses Regarding such recreational ventures as ski areas. they are allowed on National Forest land only insofar as they provide a needed public service

800 The FS needs to plan to become more efficient and if you will. just to work harder so that the forest may make the contribution that it is capable of making without spending excess amounts of money One approach that might be considered is to use more outside help with less government employees An end result timber sale contract might be one way to do this The purchaser might take the area, harvest the timber and give the area back to you complete with healthy growing established trees

We are exploring more ways of using contractors and concessionnaires as a means of improving efficiency

900 I believe that a proper economic analysis of all the plusses and minuses of benefits which accrue to the taxpayers from our SQF would show the following 1) Fop each dollar Spent by the FS. more economic benefit results from recreation use of the forest than from timber sales 2) More jobs, and more economic support of nearby communities results from development. maintenance and operation of recreation facilities than from expending the same amount of

In most cases we are not faced with an either/or situation With multiple-use we can have both timber and recreation and make a greater socio-economic contribution than by emphasizing exclusive uses far individual resources

money on timber sales. taking account of the costs of roads. supervision of logging operations. and reforestation

1000 I am representing the High Sierra Stock Users Association, an association for recreational purposes There's been a lot of talk about the importance of the economic impact Horsemen in California contributed 1 3 billion dollars to the California economy in 1984

We have estimated the socio-economic impact of recreation uses of the Forest This is shown in Chapters 2, 3, and 4 of the FEIS

1100 Whatever plan is implemented by the Forest Service. it should live within budget limitation Current proposals are in variance with the present federal budget Money obtained from forest uses will he put back into the forest so if the budget is cut. uses such as recreation and wildlife do not suffer from these cuts because of over-emphasis on commodities

Please *see* Appendix L of the FEIS for a discussion of the relationship between the Forest Plan and the annual budget Please note that revenues from management of National Forest lands do not come back directly to the Forest Service. but rather are put in the U S Treasury

1200 The AER respectfully asks the FS to analyze in depth the Current and future needs of the American public in housing. jobs. developed and dispersed recreation outside of wilderness areas and the use of the SQF as a source of revenue for reducing the Federal deficit of the United States

See the 1980 and 1985 RPA analyses for a broad assessment of housing and recreation needs

1300 You have not properly analyzed the mineral situation in your report You have scarcely mentioned minerals as if they are of marginal Importance. when in reality the national defense and economic health of our nation is predicated upon the adequate and readily available supply of raw materials including minerals

Please *see* Chapters 2 and 4 of the FEIS for a discussion of minerals Please see Minerals and Geology sections of the FEIS Forest-wide Standards and Guidelines in Chapter 2, and the discussions in Chapters 3 and 4 will assist your understanding of the minerals slutaton on the Forest

1400 Funds do not Seem to be provided to monitor the effects of clearcutting. increased grazing. and off-road vehicle use on wildlife How can you know the effects of what you propose to do unless you monitor for a long period of time Monitoring implies management actions will he taken when damage begins to be evident The Plan does not address the possibility of reduced budgets

Please see Chapter 5 of the Forest Plan for the monitoring plan The full Cost of this plan is included in the projected annual budget Please *see* Appendix L of the FEIS for a discussion of the relationship between the Forest Plan and the annual budget

1500 In this period of Congressional struggle with government deficits. helow-cost forestry is not likely to withstand budgetary tests Needed Information 1) Instead of the inflated budgets for below-cost timbering. budget estimates for at least the first planning period based on stringent federal

Please *see* Section *"e"*, Timber. of Chapter 3, FEIS, for a discussion of below-cost sales Please *see* Appendix L of the FEIS for a discussion of the relationship between the Forest Plan and the annual budget

(010/020)

budget constraints 2) Analysis of the effect of the 25% Congressional cut (1985) in road appropriations 3) Prioritization of programs to be cut or modified if budget anticipations are unmet

1600 What provisions have been made to consider the most economic and environmentally sound use/management of the National Forests as a system or at least on a regional basis vs considering each National Forest as an island? This would especially be significant in timber harvest. wildlife management and recreational activities planning If this is not a major part of this planning process, why not?

We have a tiered planning process with Regional and National concerns covered in the RPA and Regional Guide The Regional Forester is coordinating and monitoring timber harvest levels on a State-vide basis (*See* Appendix O, FEIS) This is all done as part of a nation-wide program Each forest assesses demand for recreation and coordinates with neighboring forests where necessary Similarly, each forest assesses impacts on wildlife. and where necessary. coordinates with neighboring forests and the California Department of Fish & Game For example. management of certain threatened and endangered species is closely coordinated among the forests hosting habitat far such species Finally. the Regional Guide provides general coordination, standards and guidelines far resource management throughout the Pacific Southwest Region

1700 I would like to mention that the businesses located in the Kennedy Meadows are heavily dependent on the income provided by the sportsmen and recreational users who used to frequent these now closed areas

Except to say thank you. we have no substantive response to this piece of information

ECONOMIC VALUE OF FOREST (021)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 It is my understanding that we are losing large concentrations of our timber due to forest insects and due to the prohibited use of certain chemicals I feel it is time to return to the proven successful Forest Service management policies of the 1960's	On the Sequoia. there ape no unusually large losses of timber due to insect damage Even if there were, application of chemical pesticides may be less effective than removing the diseased trees At this time, the *use* of chemicals is being evaluated in a Region-wide EIS This process will have to be completed before the use of chemicals is an option for management
200 Developers have something more in mind than cost-effective timber production	We can have no substantive response to such a general statement
300 Save the Forest Service and the taxpayer's money Some of it could be used to encourage low-impact recreational activities. for instance hiking. camping. picnicking. bycycling. fishing, birdwatching, snow-shoeing. cross-country skiing	Except to note that we do encourage these types of recreational activities, we have no substantive response to this expression of opinion Please refer to the management direction (Chapter 4 of the Plan) for more detailed information
400 We are one of those support industries outside of Tulare County Any decline in lumber production would affect our business A slow down would	Since the Allowed Sale Quantity for the PRF shows virtually no change from the historical level of harvest, there should be no impact on businesses

adversely affect the level of employment we maintain in our operation The forest products industry is renewing trees at a rate equal to or above the harvest rate Give consideration to the acceptable level of harvest They aren't about to cut themselves out of business Give consideration to the needs of industry	dependent on timber from the Sequoia NF We have to address broader level timber supply effects
500 It is obvious that commodity outputs are being given very high priority by the FS This is reflected in your alternative as the overriding force in allocating land *use* and developing management directions The belief that all things can be reduced to dollar equivalents is tough on amenity resources like fish and wildlife We urge you to consider our complaints and seek further consultation and advice **and** make changes in whichever alternative you choose to protect and enhance our natural resources in wildlife and its habitat	Every alternative contains provisions for both commodity and amenity resources (e g , the protection of wildlife habitat) The alternatives vary in the degree of amenity enhancement
600 What will the effects of the timber program proposed in each alternative be on the following list of **vendors?--O** B Nuzum Tire-Bakersfield, King Bearing-Mojave, Eureka Fuel-Bishop	Since there is virtually no change from the historical level of harvest, there should be no effect on these vendors
700 Value of new road mileage resulting from timber harvest should only he counted **as** a benefit where compatible with the ROS (Recreation Opportunity Spectrum) classification far those particular acres. When new log haul roads change ROS class. as from Semi-Primitive Non-motorized to Semi-Primitive Motorized, roads should carry **a** negative value in appraising benefits	Roads yield a number of benefits, not just recreational ones Hence. it would he inappropriate to determine the benefits of a given road according to whether it changed an ROS class.
800 Tulare County Farm Bureau supports the concept of safe. efficient and **economic** *use* of our natural renewable resources Tulare County Farm Bureau has gone on record supporting the Preferred Alternative Plan as drafted We would also like it noted that we support an increase in timber usage above the one hundred and **four** million hoard feet denoted in the Preferred Plan	Thank you for your **support** and this expression of opinion
900 Due to budget cuts. **some** FS positions have been Cut In our general area. they have lost **a** wildlife biologist. fisheries biologist, a hydrologist, and a soils specialist All of these positions are for the protection of the forest (wildlife and their habitat) a) It would be virtually impassible **for** other personnel to double up, due to the complexity	Regardless of budget. we are responsible for implementing MMR's and MIR's (see Appendix L for additional discussion on this matter) Reforestation on the Sequoia has not been reduced in response to reduced budgets

(021)

of their own jobs - (silviculturalist, timber management. etc), and do an effective job b) Again, wildlife and their habitat suffer Budget cuts in many cases have reduced reforestation efforts

1000 The Forest Service appears to be subsidizing both grazing and lumber harvesting on National Forest Lands These areas should he generating income to help with management objectives This income must be generated by increased fees, not necessarily increased leasing

When all costs and benefits are considered. the timber and grazing programs show greater benefits than costs Also, please *see* Chapter 3. FEIS. for a discussion of below-cost timber sales

1100 The alternative selected as the long-range forest plan should be determined on what should or what needs to be done on the SNF and not on what anticipated Short-term annual budgets might he

The PRF Alternative does. in fact. represent what should be done over the long haul as opposed to what the next annual budget might or might not provide for

1200 Recreation benefits are not hard cold dollars changing hands This type of benefit is sometimes referred to as "funny money" The point of all this is that if a low budget alternative must he selected it should be one which emphasizes management programs which return hard dollar revenues to the U S Treasury rather than funny money Also. if an alternative is selected and has a good mix of *uses*, but because of reduced annual operating budgets cannot be fully implemented, then mangement programs emphasized with the budget available should he those that return hard dollar revenues rather than funny money

Please *see* Appendix L for an explanation of the relationship between the Forest Plan and the annual budget

RECEIPTS TO COUNTIES (022)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Plan does not display an analyses of the effect of alternatives on the 25% fund	Within each alternative there are a variety of ways *revenue* can be changed Looking ahead to increased recreation use and the possibility of higher use fees, plus an expected continuing demand far saw-timber. receipts to counties will probably increase Because of the number of unknowns (i e , value of outputs) within each alternative. lengthy analysis would serve little purpose Please *see* discussions and displays in Chapters 2, 3, and 4 of the FEIS
101 How much more importance to Current and future management will be assigned to programs that enhance hard dollar returns to the U S Treasury and Forest Reserve Fund payments to Counties in light of decreased operating budgets?	Reduction of the federal deficit remains a high priority for the administration Programs thot contribute to a reduction will continue to be preferred over those that do not

(022)

102 The Board of the Porterville Elementary School District supports a balanced use of the Sequoia National Forest and any reduction in timber receipts would negatively impact our funding	We have no technical response to this Statement of support for a timber program which does not reduce receipts
103 Recreation related activities account for 2/3's of the income of communities surrounding the Sequoia National Forest	We agree that a large portion of local community income is derived from recreation oriented activities

AIR QUALITY,GENERAL *(040)*

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The Conservation Alternative further proposes that current air quality in all areas of the Forest. not just the Wilderness Areas, be documented for all sensitive indicators for each Air Quality Related Value	Sensitive indicators for Class I Air Quality Related Values (AQRV's) are established as a method of evaluating potential degradation from proposed major emitting facilities Under the current requirements of the Clean Air Act, the Forest Service only has a legal avenue to make recommendations regarding permits requested by facilities with potential to impact Class I areas The lack of established indicators in Class 11 portions of the Forest does not imply neglect The Forest Service is increasingly involved in research and analysis to determine effects of photochemical oxidents, smoke management techniques to reduce visibility impacts and particulate emissions. and acid deposition impacts to forest resources Much of the information collected in Class I Areas can he applied to a better understanding of air quality in Class II portions of the Forest
101 Air quality should be monitored at frequent intervals to determine if changes in air quality are occurring over time	Sequoia National Forest monitors several critical pollutants in an effort to establish baseline concentrations and track changes The Forest has been involved in monitoring photochemical oxidents and particulates Wind speed and direction have been collected at several Sites in an effort to begin establishing daily wind patterns In 1987, Sequoia NF initiated a visibility monitoring program for the Dome Land Wilderness
102 strict guidelines should be adopted to insure that future activity on the Forest such as prescribed burning. visitor traffic. OHV use, and other logging-associated activities such as herbicide application do not become a factor in decreasing Forest air quality below current levels These guidelines should require the FS to take immediate and effective action to eliminate any source of pollution significantly decreasing air quality over current levels	Methods to insure evaluation and mitigation of Forest management activities that may impact air quality are currently in place Environmental Assessments (EA) or Environmental Impact Studies (EIS) are required prior to the *use* of prescribed fires, logging activities. and major recreational developments Recent EIS's on Sequoia have addressed air quality Continued attention to air quality is planned for future EA's regarding prescribed fires and logging activities

(040)

200 Emphasis should be placed on the following 8) To promote a better Air Quality Program, and to reduce pollution and emissions caused by vehicles. erosion, construction, use of unpaved roads, prescribed burns. wildfires The reduction of acid rain which affects our forest, lakes and streams	Please refer to 100 and 102 above
300 The Plan seems to be against the people who like to get out of the town and be at peace in the wilderness To hear the lumber truck and the off road vehicles we may as well stay in the town and cities God gave us this wonderful country, not this wall to wall city. let's leave it this way	This is a general Statement of personal values for which we have no substantive response
400 Air quality in the forest has been deteriorating for a number of years Emissions are harmful. despite this knowledge. the Forest Service Plan offers more and more opportunities for vehicles to go deeper and deeper into the forest While our air quality may be greatly affected by pollutants drifting in from outside areas. it does nothing to improve it by encouraging more and more auto traffic into the forest The Preferred Alternative does this by proposing 3 new ski resorts, increasing OBV travel. and more roaded areas	The FEIS does predict significant increases in recreational activity throughout the planning period However. major developments such as new ski areas will require an EIS including an air quality analysis to determine impacts and investigate mitigations Project EIS's will establish current conditions and trends. and will predict pollutant concentrations added by each proposed development This information would then be evaluated to determine significance
500 Needed information The impact on the Forest of acidic deposits from sources inside and outside the Forest has been totally neglected in the FMP and DEIS	Thank you for bringing this to our attention A discussion of acidic deposition has been added to Air Quality Section of Chapter 3, FEIS. and as a research need in Appendix B of the Plan
501 Needed information Impact of acid rain on the feasibility of tree restocking after clear-cutting and the alternative advantages of preserving and restoring old growth forest with stronger resistance to acid deposition impacts on trees and soil	It is true that more information is needed regarding the impact of acid deposition on various resources The Forest Service is currently tracking and participating in efforts to determine the effects of acidic deposition in the west As the result of impacts in the eastern U S and Europe. the Western States have launched a comprehensive research effort that seems to be preceding significant damage Sequoia National Forest will rely on research to provide information in a timely manner to protect resources The Forest Land Management Plan will be reviewed every 10 years allowing for new information to be
502 Needed information Alternate management plans in the event that acid Pain further impairs the feasibility of clearcut logging and tree plantations	Please refer to 501 above

503 Needed information Analysis of EPA studies on acid **Pain** These data need to be taken into account in the DEIS air quality analysis	Due to the suspected vulnerability of **Sierra** soils and water. acidic deposition is one of several transported pollutants of keen interest to the Forest Service The Forest Service continuously tracks research regarding acidic deposition and Joined forces with EPA in the Sampling effort mentioned No samples Were taken from the Sequoia National Forest Since acid deposition research is In its Infancy, it would not be practical to discuss or attempt to draw any conclusions from specific research project at this time Research is providing needed information that will continue to be supported by the Forest Service
504 Needed information Analysis of the World Research Institute study documenting the rise of acid rain in the Sierra Nevada	Since acid deposition research in the west is in its infancy, it would not be practical to discuss or attempt to draw any conclusions from specific research at this time
505 Needed Information Effect of air pollution practices on Class I areas in the Forest and adjacent **Sequoia** NP Many of the Forest burning practices and other polluting activities may not proceed as planned under the restrictions of the Clear Air Act if they degrade these Class I areas	Although the Clean Air Act does not specifically address smoke as an air pollutant. it does provide the states with the responsibility and authority to establish regulations to deal with smoke The provisions of the Act that deal With the Prevention of Significant Deterioration (PSD) apply only to major stationary sources of air pollution. such as power plants. and does not include prescribed fire which is defined as a temporary source **However.** the Act does mandate a responsibility of the Federal Land Managers to protect the Air Quality Related Values (including visibility) in Class I **areas** In order to minimize smoke intrusion into Class I areas, the Forest Service has developed smoke management techniques and will continue research to further enhance those techniques
506 Needed information Prioritization of planned Forest polluting operations to be cut at anticipated levels of pollution exceeding State and Federal standards	Based on recent research. it is quite evident that pollutants found in any degree of significance on Sequoia National Forest **are** predominantly from sources found outside the Forest The percentage of air pollutants resulting from management activities is **so** small that benefits. from cutting activities in the went of episodes exceeding State and Federal Standards. would not be realized It should be noted that prescribed fires are conducted only on allowable burn days set by the California Air Resources Board after considering predicted meteorological conditions and pollutant concentrations

507 Needed Information . The air polluting impact of Forest-encouraged wood burning by permitting wood cutting for domestic fireplace use. a factor to be considered in cost-benefit appraisal of this activity	The increase in residential wood burning across the nation has sparked interest in assessing the potential effects of such burning on air quality In the event a problem is perceived. the responsibility of controlling such emissions would be that of communities. counties. or air pollution control districts Some such authorities currently restrict the number of woad burning appliances that can be installed in new residences. and others request their residents not to burn wood when ambient air quality is law
508 Needed information . The significance of old growth forests as a pollution detoxifier and buffer	Please refer to Appendix B of the Plan where the need for this type of research is recognized
509 Needed information The effect of air pollution on fisheries	Please refer to 508 above
510 Maintain and restore old growth stands to relieve forests of severe stress from intensive cutting programs. gain maximum advantage from "decadent" forest regenerative power. maximize air purification advantages of tree growth, and benefit from alleged greeter resistance of mature trees to air pollution	More research is needed to determine which pollutants, and in what concentrations, adversely impact tree growth Same conclusions are beginning to develop, for instance with ozone, but prior to significantly altering silvicultural practices. more information is needed to determine the significance of alleged mature tree resistance to specific pollutants Please see Appendix B of the Plan where the need for a wide variety of air pollution research is recognized
511 Establish air monitoring stations at strategically located Forest sites (FMP 4-26)	Please refer to 101 above
512 In measuring particulates, discriminate between the various different toxic elements of the particulates and their separate and combined impacts	As Sequoia has the opportunity to continue particulate monitoring, chemical composition of the particulates may be analyzed occasionally
600 Air quality , loss of diversity, loss of habitat and Species - none of this is looked at in terms of cumulative impact	The Forest Plan is designed to establish broad objectives and to develop a fully integrated mix of management practices which provide for the use and protection of Forest resources, satisfy guiding legislation. and address local. regional and national issues Cumulative impacts are considered site-specific and will be analyzed in project environmental assessments Monitoring. as defined in Chapter 5 of the Plan. will ensure that cumula- tive effects will remain consistent with the intent of the plan

(040)

601 The wholesale destruction of complex ecosystems in clearcutting is NOT described in these documents The animals, plants. soil and microclimates are not analyzed for a typical 40-acre timber sale so that the public can view the whole or totality of the change wrought by the USFS

Please see #600 above

602 No description of the actual results of a given number of revegetation units exists The public should be given a careful field study of the 10 largest revegetation units in the last 3 decades showing what species exist in what numbers and the diversity. soil quality, growth. etc

A general description of the process needed to ensure a continuous flow of timber is found in the FEIS. Chapter 3 The consequences of allocating differing amounts of land to varying intensities of timber management are described in Chapter 4, FEIS These discussions are intended to he rather general in nature, as the site-specific analyses will be done at the project level prior to timber harvesting or other activity

603 NFMA requires the revegetation of logging roads Please describe that requirement in the legislation and what resources need to be committed to achieve those goals Has the USFS complied with this in the SNF?

The Section of the National Forest Management Act referred to is Transportation System Section 8 which reads "(b) Unless the necessity for a permanent road is set forth in the forest development road System plan, any road constructed on land of the National Forest System in Connection with a timber Contract or other permit or lease shall he designed with the goal of reestablishing vegetative cover on the roadway and areas where the vegetative cover has been disturbed by the construction of the road. within ten years after the termination of the contract. permit. or lease either through artificial or natural means Such action shall be taken unless it is later determined that the road is needed for use as a part of the National Forest Transportation System " Logging roads are normally permanent and remain in the National Forest Transportation System Many of these roads are closed to public traffic by earth barriers giving an appearance of being temporary These roads have permanent drainage structures and will be opened up for further logging activities, planting, and other silvicultural work Such roads do not require revegetation Reestablishing vegetative cover is primarily required to protect the resource When roads are temporarily closed with permanent drainage structures. the re-Source is adequately protected However, the Sequoia NF does occasionally construct temporary logging roads without permanent drainage which falls into the category described in the NFMA Sequoia National Forest complies with this law by eliminating traffic with physical barriers and allowing the road prism to revegetate naturally

(040)

604 Research Natural Areas provide baseline Study areas for target species. The legislation requiring this is 50 years old. The SNF has none The four recommended should have been established long ago But priority should be given to establishing these in commercial forest sale areas for baseline purposes	By definition. RNA's provide baseline study for various ecosystems In the final Plan. three RNA's are recommended to the Chief for establishment The three areas are commercial forest types These are Jeffrey pine, giant sequoia, and red fir Since RNA's are nearly pristine. they provide the ecological baseline to compare management activities in adjacent areas RNA's are not located in areas that have received land disturbance
700 The importance and impact of air quality upon forest resources should be more plainly defined. Describe possible impacts upon vegetation and the potential for acid rain problem in high mountain lakes.	Please refer to 501 and 503 above

BIOLOGICAL DIVERSITY (049)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The plan is inadequate in preserving biologic diversity It stresses simplification of ecosystems favor of timber harvest, grazing and mining interests Removal of oak forest. old growth. dead and down logs and snags will cause an overall reduction in plant and animal diversity.	We believe the final Plan provides for preserving biological diversity Presently. nearly One-fourth of the Sequoia NF is within established wilderness Three Research Natural Areas are recommended for establishment end five Special Interest Botanical Areas are established. In addition, Forest-wide Standards and Guidelines for riparian. meadows. hardwoods. old growth, dead and down. and snags ensure that plant and animal diversity is maintained across the planning area In addition. management activities are planned to Create a mosaic of successional stages in portions of the conifer and chaparral ecosystems where these seral stages are lacking Combined. these factors maintain biological diversity of both plants and animals on the Sequoia NF
200 More consideration should be made for increasing biologic diversity by reintroducing native species such as bunchgrasses. big horn sheep. wolves cougars. and grizzly bears	Native bunchgrasses end cougars are found throughout Sequoia NF We are working with the California Department of Fish and Game to determine the feasibility of reintroducing bighorns to the Forest The reintroduction of grizzlies and wolves to the area may bring unacceptable risk to the Forest user and surrounding communities. although the feasibility of their reintroduction has not been studied in detail
300 I urge you to make the welfare of the flora and fauna your first priority.	Welfare of the flora and fauna is a high priority, however, we are mandated to manage for a variety of uses which limits the Concentration of management on a single resource such as wildlife See response to Comment #100 above

(049)

400 Harvesting and reforestation change the Forest composition Reforested stands are frequently less diverse than natural stands Forests should be a reservoir for biological diversity The Forest Service should reduce forest fragmentation through minimizing new road construction and modifying silvicultural practices We need to learn more about the minimum size of ecosystems We need further studies examining the consequences of various Forest practices on biological diversity	Past timber management practices in the conifer forests of selection Cutting has created uniform open stands of timber with brush understories where dense stands of overmature trees once existed Current timber practices of regeneration cutting create openings of 5 to 40 acres in size, This provides an increased edge effect The size and location of the broad ecosystems has not. and will not change significantly Within these ecosystems. however, management activities can alter the patterns of diversity through time and space by changing the distribution and overall balance of vegetative stages By increasing the kinds. amounts, and distribution of vegetative stages represented within these ecosystems. the size, type. and stability of plant and animal communities can be expected to increase
500 There should he areas allocated to preserve diversity and protect wildlife	The Sequoia NF has five wildernesses Approximately 21 (or 264.071 acres) of the forest are in established wilderness Management direction within wilderness is that there will be no timber harvesting, no manipulation of vegetation for watershed. wildlife. or range purposes. and no use of motor vehicles. mechanical transport, motorized equipment. nor installation of Structures Other than as specifically provided in the Wilderness Act Also there are 50.500 acres preserved for spotted owl management outside wilderness which receive minimal impacts from Forest Management activities Approximately 15,500 are located in existing wilderness and a portion of the 50.500 is located in riparian areas. scenic corridors, etc Also, Research Natural Areas and Botanical Areas will he managed specifically for the preservation of diversity and protection of certain plant species

VEGETATIVE DIVERSITY. GENERAL (050)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION--
100 Vegetative diversity will decrease due to the planned intensive treatment of stands to reduce competition	Intensive treatment of timber stands will be limited Not all stands will be intensively treated Treatment to reduce competition will only cover the first few years of seedling establishment Then, vegetative diversity will increase until the conifer trees reoccupy the site
200 Prescribed fire should not be used to increase vegetative diversity in wilderness	Please see comment 800 under the resource code 070, Fire & Fuels. General

(050)

300 The DEIS specifies that at least 5% of each vegetation type/seral stage combination Pound on the Forest will be maintained What are these types and stages? Specific methods for attaining protection and monitoring population trends of the elements are not adequately described	The major vegetation types found on the Forest are described in Chapter 3, FEIS This requirement is primarily directed toward preserving "high risk habitats" such as old growth coniferous Forest Most vegetation types/seral stages will incur modification on a programmed basis **as** outlined in the final Plan These changes to meet the five-percent requirement will be assessed by aerial photography and in timber compartment planning Means of attainment include dedication through the establishment of wilderness, Research Natura1 Areas. Special Interest **Areas**. and special management plans such as the Forest-wide Giant Sequoia Management Plan

OLD GROWTH FORESTS (051)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The draft planning documents contain zero Information an individual groves Amidst hundreds of pages of data and text, there is not a single page or table listing the groves or providing any information an the attributes of particular groves	The Sequoia Land and Resource Management Plan deals with classes of land use Based on your comment. a table on giant sequoia groves **was** added to Chapter 4 of the final Plan **Because** of the unique features of these groves. **a** comprehensive Forest-wide analysis will be carried out separate from the Sequoia Land and Resource Management Plan This analysis will he made with full public participation and will be specific to individual groves The analysis will be documented in a Giant Sequoia Grove Management Implementation Plan A preliminary estimated category for each grove has been included in the FEIS
600 The Forest Service is currently not providing buffer zones around wilderness areas There is absolutely no need for intensive timber harvesting up to **a** wilderness boundary I strongly recommend such zones	There is no buffer **zone** identified around existing wilderness boundaries Timber harvesting can **occur** adjacent to wilderness to meet other multiple-use objectives (Also. ***see*** Visual Resources, Comment **#407)**
700 I support a management plan which would include full inventory of old-growth and near-old-growth **trees** before any further logging is done No logging of old-growth trees or previously unlogged forest	Under the Plan. old-growth timber will remain in wilderness. near campgrounds. along streams. in spotted owl habitat areas. along high use recreation roads and **trails, in** wildlife clumps reserved from timber harvest. **in** giant sequoia groves. in some archaeological sites. and in many areas where timber harvest is uneconomical or is not the main management objective of the land
1100 The decision to manage 8-9,000 **acres** of sequoia graves containing mature sequoias and mixed conifer with an emphasis on timber management is incomprehensible The special Interest aspect of sequoia groves is not limited to the remaining mature and large immature sequoias themselves	The number of acres to be managed nan-intensively. or in any other mode. **is** indeterminate until the Forest-wide Giant Sequoia Grove Management Implementation Plan is completed **(see #100** above) In the meantime, no further plans will be made for projects of any kind within giant sequoia groves In the

(051)

Historical and natural aspects of the groves should also contribute to the planning perspective of forest staff	Preferred Alternative the estimated acres dedicated to Preservation is increased to 3.900, and **acres** to be managed as Intensive is decreased to 0.

FOREST SERVICE ROADS (061)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Keep roads open for public **use** because 1 Logging roads **are** paid for by tax money and should be available for use 2 There is a vast amount of land into which there are no roads 3 It is the only way many handicapped people have to enjoy nature 4 Health and Safety considerations can be posted	Road construction and maintenance is paid for by public funds and by the sale of National Forest products However, making roads available without restriction would prove to be irresponsible management of the taxpayer's road investment Traffic on Forest earth-surfaced roads can result in costly damage to the road surface as well as drainage structures when vehicles attempt to negotiate rain and snow soaked roads throughout the winter Unrestricted traffic would also pose a threat to soil and Water resources associated with road damage Most of the roads on Sequoia National Forest are available to the public throughout the **summer** months when the majority of use **occurs** and road and **resource** damage Can be minimized
200 Proper access for routine operation. maintenance and emergency repairs of hydroelectric facilities must be preserved Access restrictions on hydroelectric operations would create an intolerable Operating burden which would ultimately be paid by PG&E's customers Our access right as a permittee must be clearly protected and defined in those management prescriptions which limit vehicle access We ask that you add the following to the OHV section on pages 4-18 and 4-19 "Established utility **uses** of motorized vehicles and equipment within these areas will continue to be authorized " Furthermore, PG&E must have the opportunity to review proposals for road obliterations which may potentially impact our utility operations	Established **access** by utility operators for routine operation. maintenance, and emergency repairs of facilities is preserved under existing authorization Access guaranteed by existing agreements will not be circumvented by restrictions in the Plan
201 The term "road restoration" is not clearly defined It is our understanding that the term applies to those roads which are "put to bed" **or** taken out of service until their need is again required This application conflicts with your glossary definition for restoration	Restoration as defined in the FEIS glossary does not apply to roads Road restoration is the investment in construction activity required to rebuild a road to its approved traffic service level
300 In many NF's accurate up-to-date planning maps of roads and trails and other routes **are** unavailable Now that a vast mileage of roads has been constructed planning cannot reasonably be undertaken without knowledge of the location of the transport System **so** that some balance can be reached with respect to all multiple **uses**. **as** required by	An up-to-date inventory and maps far system roads on the Sequoia National Forest are on file at Sequoia National Forest Headquarters in Porterville We agree that the transportation system plays an important role in determining multiple-use of the Forest, and Sequoia's road inventory was utilized throughout the planning process

the provisions of NFMA .

301 We believe the following road information is needed in the FEIS 1) Accurate, updated maps of the forest transport infrastructure and delineation of the clearcut and other forest timbering locations to which the roads lead Inventory and maps of fuelbreak systems. their impacts on watersheds. allowable uses on fireroads and firebreaks (cycling?) and the impacts of these uses are essential at the planning stage 2) Completion of a road obliteration plan as an essential element of the FMP-DEIS 3) Definition of standards of road "obliteration" and means employed to return roads to a "natural state" 4) Evaluation of opportunities to create roadless area designations by road obliteration and land restoration

1) The Forest Plan is designed to establish broad objectives and develop a fully integrated mix of management practices which provide for *use* and protection of Forest resources, satisfy guiding legislation. and address local. regional, end national issues Site-specific data is analyzed and presented to the public in the form of Environmental Assessments for logging activities & in "Level III" planning for fuelbreaks. prescribed burns. and protection facilities Existing fuelbreaks are shown an unit pre-attack maps and plans 2) Sequoia National Forest has completed an inventory of abandoned roads Where possible. abandoned roads not planned far future *use* will be obliterated Roads classified as abandoned are those no longer needed for access or management and not economically feasible to maintain 3) "Obliteration" is defined in the FEIS Glossary where possible. roads slated for abandonment and not needed for future *use* will be obliterated As described in the FEIS Glossary, the objective of obliteration is to eliminate the functional characteristics Of a road and re-establish natural resource production capability The Sequoia National Forest is Satisfying this objective by eliminating traffic with physical barriers end allowing the road prism to revegetate naturally Natural revegetation also complies with the requirements of the National Forest Management Act &) The RARE II process evaluated all lands within the National Forest System Through this process, all roads existing at the time were evaluated When an area contained nan-engineered roads, it was considered roadless This process received extensive public review and a Final EIS was published in 1979 This FEIS established all areas that were considered potentially available for Wilderness

302 We believe the following trail information is needed in the FEIS 1) As a supplement to the Forest transport system inventory and map, an inventory of hiker-equestrian trails. preferably on overlay maps 2) Explanation of methodology employed in collection and estimating past. present. future statistics in the various visitor *use* categories 3) An appraisal of the feasibility of minimum trail clearance 4) Feasibility of identification and registry of forest trail network as a historical trails system 5) Bicycles are off-road vehicles. A policy Statement is necessary in the DEIS on the impacts of bicycles and other off-road vehicles on foot and horse trails

1) The Preferred Alternative requires that the Forest develop a comprehensive trail plan The actual decisions an new trails to be constructed and the types of allowable *use* will be made during the development of this plan The existing trail inventory is available for viewing at Sequoia National Forest headquarters in Porterville
2) An explanation of sampling techniques used to collect recreation use information has not been included in these documents This is project specific information thought to be inappropriate far this level of planning However, use information is gathered in a number of ways through approved statistical samples, estimated from actual counts.

	(061) and/or estimated by field personnel The method used depends on a number of factors. the two most Important being the need for accuracy and the cost to collect Much of our information is derived using the various estimating techniquess 3,4) These are very specific recommendations that are outside the scope of this Plan The selected alterntive requires that the Forest develop a comprehensive trail plan that will specifically determine trails to be constructed, standards, and allowable *use* 5) Mountain bicycles are treated as OHV's In the Standards & Guidelines of the Plan and as such will be restricted to designated OHV trails
303 We propose the following Wildlife-recreation alternative transportation items 1) Major reduction in new road construction. except for critical transport connectors in areas already roaded No construction of roads in roadless areas 2) Obliteration of roads and restoration to natural conditions 3) Expenditure of transportation funds for construction and maintenance of hiker-equestrian trails 4) Prohibition of OHV traffic (including bicycles) on hike=-equestrian trails. All OHV *use* to remain on designated and maintained roads Cross-country OHV traffic not permitted	The selected alternative represents what the Forest Service believes to be **a** responsible balance of natural resources provided under the principals of multiple *use* and Sustained yield
400 Maintain all of the system roads to prevent soil erosion	Forest Service maintenance standards are designed specifically to reduce opportunities for soil erosion The Forest Service is continually involved in research to improve road and drainage design to lessen soil erosion potential
500 I urge that provision be included in the Forest Plan for the improvement of road turn-outs and access paints along the Upper **Kern**	Thank you for expressing your interests The Forest Land Management Plan is designed to formulate broad guidelines for Forest management Specific projects such as improving road turnouts and access points along the Upper Kern can be dealt with independently but within the framework of an approved plan It should be noted that Tulare and Kern Counties are responsible for maintaining the Section of road that parallels the **Kern** River up to the bridge crossing near Brush Creek and the Forest Service maintains the Lloyd Meadow Road paralleling the uppermost Section of the Kern
600 No roads should be constructed in currently unroaded lands There are already many roads that revel the characteristics of the forest to the public I do favor more handicapped **access** along the roaded areas I don't **see** where the handicapped	Road construction is reactive to management activities Management activities in roadless areas will be based upon multiple-use principles that satisfy the legal obligation of the Forest Service to provide a balance of natural resources Elderly and

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are dealt with in the plan

handicapped standards will he considered during rehabilitation, reconstruction and construction of recreation facilities Barrier-free trails will be developed near some **areas** (reference Plan. Chap. 4 under General Developed Recreation Sites) This will include consideration for restrooms and/or rest Stops Recognizing some Forest **users** Cannot hike and require vehicles to get around. the Forest Plan is not recommending any more wilderness **areas** within the Sequoia National Forest, and 4x4 trails will remain open where **resource** protection **measures** can be assured and where this type of use is lawful

ROAD CONSTRUCTION & CURRENTLY UNROADED (062)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Road construction should be encouraged because it allows better access to more remote areas and people should be able to get into the Forest without going afoot	Road construction in the Sequoia National Forest is reactive to resource management activities Various intensities of road construction are presented throughout the FEIS alternatives depending on the management emphasis Providing for motorized recreation is one of the multiple-use obligations of the Forest Service
200 Fewer roads should be built because 1) Road access is sufficent now 21 Waste of taxpayer money 3) Extreme impact on the environment 4) New roads will increase traffic congestion 5) roads result in more litter & pollution *6)* Logging should be done without roads or only temporary roads 7) Forest Service does not need additional administrative **access** Utilize horses instead 8) roads encroach on wildlife and pose fire hazards 9) Forest Service moves too fast with road construction Slowdown and analyze impacts **more** carefully	**1)** Road construction is reactive to resource management activities In all of the alternatives presented in the FEIS. some degree of raading is necessary **to** provide for the management direction of the alternative 2) The Forest Service has a legal obligation to provide **a** balance of natural resources Roads provide access necessary to fulfill this obligation 3) Each management activity requiring road Construction is analyzed thoroughly by an interdisciplinary team of **resource** specialists during the Environmental Assessment process Road construction impacts on flora. fauna, water. and soil **are** commonly analyzed and necessary mitigations employed to avoid significant damage Planning end analysis of road construction generally begins 3-5 **years** in advance of each management activity 4) The FEIS predicts **a** Significant increase in recreational users throughout the planning **period** New roads would tend to decongest traffic. rather than congest. by creating more opportunity to disperse 5) Increased recreational demand **will** likely Increase. to some degree. the litter and ***various*** forms of pollution on the Forest ***We do*** not, however. believe that **new** roads will be a **major** stimulating factor in increasing recreational activity *6)* As stated in #3 above. road Construction is analyzed in the Environmental Assessment process If difficult terrain will **re**sult in exorbitant road costs or if unacceptable

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resource damage is expected, alternate methods such as helicopter logging may be evaluated 7) Roads are not constructed solely for administrative access Administrative access is normally a benefit derived following some type of management activity For example. administrative access is required to plant trees and perform other silvicultural work necessary to insure successful regeneration following timber harvest 8) *See* #3 above 9) *See* #3 above

300 Have you learned nothing from the sad experience of earlier forests and parks? It is wrong to build more paved roads than hiking trails People come to parks to *see* majestic nature. not more parking lots and highways

The responsibility of National Forests is based upon the Multiple-Use Sustained-yield Act of 1960 that states in part that National Forests "shall be administered for outdoor recreation, range. timber. watershed. and fish and wildlife purposes " The Forest administrators are, therefore. obligated to the American public to manage the land for these multiple uses

400 We are not aware of any areas which **are** not accessible We assume "accessed" is an euphemism for "made accessible by road construction " If that indeed is what is meant. it should be *so* stated

This is generally true depending on the context used When the ward "accessed" is used with regard to logging for example. road construction would normally be the method

500 Why is it necessary to build all the road for an amenity alternative? If the entire forest is to meet P,R,PR In AMN, why would the Forest appear other than natural from lightly used roads and trails?

As a result of some management changes in the AMN alternative road construction is significantly lower than presented in the Draft EIS Please *see* AMN alternative Outputs in Chapter 2 The forest landscape may appear slightly changed in the partial retention **zones** This objective allows for management activities that can he noticed by the average visitor, but does not dominate the naturally appearing landscape We have revised the section entitled "Environment to be Created" in Chapter 2, Amenity Emphasis, to further clarify our position

600 I oppose the increase in road building I **fail** to see the logic behind the plan to build 95% more miles of new roads than hiking trails This proposal is designed to subsidize the business endeavors of loggers. miners and cattlemen The recreational users of the Forest are being ignored I support an equitable balance between road and hiking trail construction

The Forest Service has an obligation to provide a balance of natural resources Providing equal road and trail mileage does not necessarily equate to a balance of the **resources** provided by each

700 The Plan is contradictory in its discussion of roadways It is apparent that when the Plan is addressing environmental concerns, It chooses to ignore road extension, but when addressing the timber interest it talks about a *40%* road increase

Please note that the Section of the Plan referenced is titled "Future Condition of the Forest" which describes how the Forest is expected to change with the implementation of the Plan In describing the FUTURE condition. Chapter 4 of the Plan reads "Most

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of the Forest available for resource management will be roaded " This statement refers to the future condition and is entirely consistant With projected road expansion

800 The DEIS contains virtually no discussion of the potential impacts of road construction on water quality

Please see Chapter 4 FEIS. Surface Water Resource

801 Based on calculations performed on data provided in the Plan. DEIS. and the Analysis of Management Situation (AMS), the forest has the capacity to accomodate all forms of motorized recreation at the present time and in the year 2030 Building new roads then. will not serve to increase motorized recreational use. only transfer it from one area to another on the Forest Thus. the proposed road construction program will serve the single purpose of providing access for the timber harvest program Accordingly. the entire cost of road construction should be borne by the timber program

Dispersed recreation provided by the Preferred Alternative will meet but not exceed the demand New roads and improved access will help meet the demand while it is true that some recreation use will be moved from one area to another. this will result in a dispersing of use and an improvement in the quality of the recreation experience The cost of construction of roads and which program is responsible is a function of the E A process which determines the short- and long-term objectives for specific roads

900 The proposed construction of 26 miles of road annually during the first decade for the express purpose of gaining access to timber and providing recreational opportunities for OHV users will indirectly decide the future of areas with potential for future wilderness designation

The Rare II process evaluated all lands within the National Forest System Through this process. all roads existing at the time were evaluated When an area contained non-engineered roads. it was considered roadless This process received extensive public review and a Final EIS was published in 1979 This FEIS established all areas that were considered potentially available for wilderness. including further planning areas which have been addressed in this planning process Although no additional Forest Service wilderness is recommended by this plan. the Preferred Alternative will be able to meet demands for dispersed recreation Please be aware not all areas of the Forest will be managed with the express purpose of timber and OHV use (refer to Chapter 4 or the Plan for more specifics of overall Forest Management)

1000 Accessibility to all parts of our forest by road is adequate for the next ten-year planning period We are especially concerned that as roads are built right to the border of existing wilderness areas, there will be a dramatic increase in wilderness use Concentrated recreation use is contrary to a wilderness experience

Road construction is reactive to resource management activities In all of the alternatives presented in the FEIS. some degree of roading is necessary to provide for the management direction of the alternative The restrictive nature of activities within designated wilderness tends to influence demand much more than does access to the area while it is true that better access may influence day-use activities within wilderness. the effects on the traditional overnight wilderness user should be minimal Additional access points may actually serve to disperse use rather than concentrate The wilderness planning called for in the

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Forest-wide Standards and Guidelines of the plan will consider visitor impacts on the wilderness and alternatives to resolve Conflicts

1100 This pay-as-you-go administration in Washington expansion of roads and logging interests into backcountry areas alters wilderness areas Back-country recreational use is increasing Expand areas for this use as well

The Preferred Alternative provides for an increase in dispersed recreation which includes backcountry use outside of designated wilderness. Increased roads will still provide for backcountry activities and will disperse users and reduce concentrations of use

1200 The Plan favors more roads When I visit the Sequoia. I do not want to see muddy Streams. "moonscapes". and roads in the forest

Please see response #1000 above far a discussion of roads

1300 The comparison between road construction mileage and trail miles to be constructed is pitiful Especially considering all those road miles are almost exclusively for the timber harvesting access This is mainly because roads were built where trails existed and logging has destroyed sections The number of people using trails has increased The comparison in the DEIS between new road construction clearly expressed forest service priorities and how skewed they are

The Forest Service has an obligation to provide a balance of natural resources, Providing equal road and trail mileage does not necessarily equate to a balance of the resources provided by each Please see response #200 Snowmobile -C/C Skiing for a discussion on cross-country skiing and response #100 Trails for a discussion of trails

1400 I feel that the responsibility of the people lies in the ultimate preservation of as much acreage as possible To maintain the land we do have and the acquisition of as much as we can acquire is the most important issue There are many issues up for discussion and action and the aforementioned issue of AMOUNT OF ACRES ACQUIRED is not even being combated With Federal funds we should be attaining and maintaining Anything like roads or trails should come slowly and with much thought Once something like a road or trail is laid down. it alters that immediate area forever Mismanaged funds and decisions are Sometimes only realized in hindsight

The responsibility of National Forests is based upon the Multiple-Use Sustained-Yield Act of 1960 that states in part that National Forests "shall be administered for outdoor recreation. range. timber. watershed, and fish and Wildlife purposes " The Forest administrators are, therefore. obligated to the American public to manage the land for these multiple uses For a response to road construction please see #1000 above

1500 Accessibility to all parts of our forest by road is adequate for the next ten year planning period As roads are built right to the border of existing wilderness areas, them will be a dramatic increase in wilderness use Concentrated recreation use is contrary to a Wilderness experience It is important to keep roadless areas in the non-wilder-ness parts of the Sequoia NF, especially in those regions that adjoin a designated Wilderness At the conclusion of timbering activities. lagging companies should be required to return the forest to a natural a condition as possible This includes

Please see #200 above for a discussion of road needs for the planning period

Please see #1000 above for a discussion of roads and their relationship to wildernesses

Please see Forest Service Roads #301, for a discussion of road obliteration

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the obliteration of all logging related roads

1600 I might say we have one area. one roadless area. that was studied It has been represented in red. the *Moses roadless* area. and I strongly urge the development of that area in the first decade Contrary to a statement that was made earlier this evening, the timber management on the SQF is cost effective If you consider the last 6 years. starting in 79. the figures are available if anybody would like to see them, that the returns from timber sales. timber harvesting on the SQP far exceeded the money Spent on timber management. and I might say this covered 3 years. the poorest years the timber and lumber industry has Seen since the depression years Some People are relating to the budget and I think when we are looking at the Management Plan for the SQF in the next 10, 15 years or beyond. that the budget Should not be a consideration in that at this time If there are budget restrictions. then that is the Job of the forest supervisor and the regional forester to determine how the money is to be spent. but I think we would be not doing Justice to the Forest Management Plan if there is any restriction put on the budget because we do feel that there may be some restrictions at this time. but who can see 7 or 8 years from now or 10 or even 5?	Development of roadless areas will be based on multiple-use principles We are in the business of *managing* the land for the "greater good of the greater numbers " We provide economical sale offerings to meet the demands of Congress Our goal is to most efficiently provide goods and services to the people of our nation in an environmentally acceptable manner

TRAILS (065)

---PUBLIC COMMENT *(QUOTATION/PARAPHRASE)*---	---FOREST SERVICE RESOLUTION---
100 Trail construction proposed in the preferred alternative is inadequate More than 21 miles of trail construction in the first decade is needed to meet demand	The Preferred Alternative includes a requirement to undertake trail system planning to identify specific needs for ell uses (see Standards and Guidelines) In addition. the Preferred Alternative will allow for modest increases in existing trail mileage if trail planning identifies additional needs
200 More effort needs to be put into trail maintenance and reconstruction	The emphasis on trail maintenance has been increased in the Preferred Alternative However. as with other activities. the amount of on-the-ground maintenance and reconstruction is dependant on the available funding The Preferred Alternative calls for efforts to develop alternative funding sources for trail maintenance If these efforts are successful. additional trail maintenance and/or reconstruction will be possible
300 Trail construction and hiking management should be expanded in non-wilderness areas The 21 miles of new trail construction proposed for the first	See comment #100 above

decade is inadequate

400 We would like to see many more hiking and skiing trails (and perhaps mid-way shelters) I'm sure that building hiking trails would be much less expensive than road building You might even be able to get free labor from environmental groups.	The Preferred Alternative allows for a modest increase in trail mileage. It also Will allow for establishment of overnight or hut facilities for winter activities Because of budget considerations the Forest Service Often utilizes volunteers to help with projects These include both environmental groups and OHV user groups (see Forest-wide Standards and Guidelines in the Plan)
500 I hope you will consider that the Kings is a camping and recreation resource that is unique. and not "just a campground " A hiking trail from Yucca Point to Garnet Dike Would make this stretch of river accessible to hikers and fishermen.	We also appreciate the fact that the Kings is "not just a campground " This extremely rugged canyon offers a variety of opportunities A trail from Yucca Point down into the canyon currently exists An extension to Garnet Dike would be a way to expand those Opportunities Unfortunately. our Studies indicate construction would be very expensive and such a trail is not planned at this time
600 I was shocked to learn that directors in the Sequoia District have not applied for any green-sticker funds Connecting loops could be built Trend-setting land management plans' solid savings of funds Without going through the Fed'	The Preferred Alternative calls for the Forest to explore opportunities for development of alternate funding sources (see Forest-wide Standards and Guidelines in the Plan) This will include use of California State Greensticker funds to build and maintain OHV trails The Forest is currently using "Greensticker" funds and anticipates that this use Will continue
700 Two projects that are badly needed are 'connecting links' for riding loops 1) Connect Rattlesnake Creek with the north end of the Stony Meadows Trail 2) Connect North end of Siretta Peak Trail with South end of Boone Meadow Trail via Machine Creek.	The Preferred Alternative requires that the Forest develop a comprehensive trail plan The actual decisions on new trails to be constructed and the types of allowable use will be made during the development of that plan The trails mentioned will be considered at that time
800 We use Sequoia National Forest for riding two or three times a year We all would be disappointed if we weren't allowed to ride in the Sequoia NF again Biking is our family R/R We have always supported the BLM through the green stickers. and Would be very disenchanted with the association, seems the more we pay in fees, the more land and trails that are taken away Please, for the future of good family fun and recreation. fight to save the trails in the Sequoia Forest region	OHV use is recognized in the Plan as a legitimate use of National Forest land (see Porest-wide Standards and Guidelines in the Plan) Under the Preferred Alternative, emphasis areas for OHV's will be identified Even though OHV use will be restricted to designated mads and trails, riding opportunities will continue (see Plan. Chapter 4 Forest-wide Standards and Guidelines)
900 I am concerned over the fate of the Summit Trail from Quaking Aspen to Windy Gap This trail Should be preserved The trail along the Summit Of Slate Mountain should be preserved Vehicles should be prohibited on this trail	This trail will remain on the Forest trail system It is and will remain a designated National Recreation Trail As such it will be managed in accordance with its approved establishment report which allows motorcycle use As long as resource values

(065)

1000 First. the Conservation Alternative strongly recommends that the PS Plan adequately and directly address the following criteria 1) The public Should be able to find the analysis of trail status and the proposed prescription for the trail network, 2) The plan should fully address trail-related issues and concerns. 3) The plan should report the current management status of the trail resources The ideal report of trail supply data would therefore include a listing Of and/or map showing trail miles --"in system". --in wilderness. --in National Trail System. -- existing but not "in system", -- formerly existing. -- by ROS class. -- current maintenance status. -- current use densities. and -- by use/ activity type (e g , hiking. winter OHV, summer OHV. riding, skiing, etc). 4) The Plan should report the projected trend of mileage and condition of the trail network 5) Projections of recreation demand should be expressed in terms of demand of each ROS class rather than demand for dispersed and developed recreation. The Plan should also describe the demand for recreation on the forest in terms of the local economic contribution generated by the use of the reerestion and scenic values of the forest Prescriptions for management areas Should specifically and thoroughly plan for the trails found there Each management area prescription should present the changes in trail mileage, condition, Use, mix Of activity and experience opportunities. and visual quality that are planned for the area. Currently, the FS fails to designate existing trails as official trails in its system of trail maintenance The 10-year Plan for recreation Should. for each RD or management area, identify and assign priority to the specific trails or trail segments. backcountry campsites, trailhead parking. and stream crossings for which maintenance. construction or reconstruction is planned The plan Should define in operational terms its proposed trail construction standards and maintenance levels The plan should identify conflicts among different kinds of summer end winter trail users and specify a program for minimizing them Included among these different kinds of potentially conflicting trail users should be commercial and individual users of horses. users of OHV's including off-road bicycles. hikers. snow machine users, and skiers The category of trails as addressed in this document is not intended to include 4-wheel drive roads Please see Off-Highway Policy for Conservation Alternative proposals relating to OHV use. The plan should show the

can be protected, this use will continue

There have been several changes in the trails seetion of the Forest Plan (see Plan. Chapter 4 Porestwide Standards and Guidelines) A number Of the items mentioned here have been considered Primarily. the Porest Plan is a general allocation document Much of what the respondent Suggests is considered to be project level information As Such it will be addressed during project planning One Of the action items to be implemented in the Plan is to develop a Forest-wide Trail System Plan This effort will incorporate virtually all of the Information requested by the respondent

interaction between the proposed development of the road system and the trail system of the forest and of adjacent wilderness or park areas The plan should address the aesthetic impact on trail corridors of all proposed resource development action The monitoring and evaluation program in the plan should identify and prioritize recreation research needs. and it should lay out a program for meeting them An ideal monitoring and evaluation program will include the following --specify & prioritize new trail-related data elements. --set frequencies for producing the data. --assign responsible staff, --estimate the cost of producing the data. and, --specify what degree of variability from the standard is needed to trigger further action The plan Should explain the method used for determining if existing trails are to be abandoned or re-routed This explanation should include discussion of criteria and priorities used The plan Should identify and Plan for the possibility of increased levels of recreation-caused degradation in the backcountry

1100 I'd like to see the following in the Plan Completion of the PCT over Owens Pt (BLM problem?)

This trail is located on public land managed by the Bureau of Land Management AS such, it is Outside the scope of this Plan (Note The BLM is pursuing Work on this trail at the time this Plan is being printed)

1200 It is good to recognize that the estimated 35% increase in demand for hiking and backpacking from 1980 to 2000 will result in demand for more wilderness Unfortunately. the plan Seems to be trying to preclude this option via an accelerated road building program

The Preferred Alternative will allow increases in trail mileage which could be responsive to increases in demand for hiking Therein. we do not feel that opportunities for hiking and backpacking will be foregone through an accelerated road building program Certainly the Preferred Alternative will involve road construction This will largely be local roads that will be responsive to various management activities Management activities in roadless areas will be based upon multiple-use principles that Satisfy the legal obligation of the Forest service to provide a balance of natural resources The Preferred Alternative represents what the Forest Service believes to be a responsible balance of natural resources under the principles of multiple-use and Sustained yield. and includes both wilderness and resource utilization activities

1300 The Preferred Alternative has a total of 21 miles of new trail construction for the next 50 years. Compare this to 777 miles of *new* road for the same 50 It is true the Forest Service recognizes the value of their trail System and provided for Its development and maintenance A

The requirement to develop a comprehensive trail plan has been added to the Preferred Alternative In addition. the Plan has been adjusted to allow for increases in trail mileage and a continuing program of trail construction (see Plan. Chapter 4, Forest-wide Standards and Guidelines)

comprehensive Plan should be developed for the entire forest that would indicate the existing trail system and Plans for future trail development, including trailheads. Signing and funding

1400 Existing trails should be maintained Non-motorized use should be given preference Reconstruction of existing trails should be given priority *over new* trails: new construction should be kept to a minimum and only approved after public input is taken

The Preferred Alternative prescribes maintenance of trails as well as outlines general allocations for "on-motorized and motorized *use* Another part *of* proposed *management* is trail System planning where specific uses will be studied ana implemented (see Standards and Guidelines and Preferred Alternative description in Chapter 2) The Plan also calls for reconstruction or relocation of approximately 1/2 of the total trail network during the first decade New trail construction will also occur (see Resource Outputs Table in Chapter 4 of the Plan)

1501 Have the impacts of expanded use of OHV's onto 400 miles of trails currently off-limits been adequately considered? Have the impacts of an expanded grazing program on trails been studied?

The impacts of these uses have been considered in the Environmental Consequences section (Chapter 4) of the PEIS

1502 Has an inventory been performed to catalog trail enhancement needs?

This type of inventory is an on-going process The Forest currently ha8 an inventory of its trail system Which catalogs maintenance standards and needs Additional needs will be identified through development of the comprehensive trail plan called for in the Preferred Alternative

1503 Lastly. the PRP Alternative proposes to construct only 21 miles of trail over the fifty year planning period Is this construction planned in wilderness or Outside of wilderness?

The Preferred Alternative has been revised to indicate trail construction continuing into future decades Most of the new trail construction is envisioned to occur outside of wilderness. although trail System planning will identify Specific needs

1504 How many miles of ""on-wilderness" trail would be lost due to road construction and timber harvest operations over the planning period?

A Standard and Guideline pertaining to this matter was included in the Draft Plan and EIS It has been revised and strengthened in the Preferred Alternative to ensure that the impacts of project Work on the trail System are minimized (see Plan. Chapter 4, Forest-wide Standards and Guidelines. under trails) Beyond this. it is not possible to give a Specific answer in miles of trail

1600 More emphasis must be upon increasing the numbers of field personnel such as trail crews, and less emphasis on administrative staff positions The public has seen the managerial staffs of the National Forests outgrow their facilities, while the high country users watch the trails disintegrate Emphasis must be placed on the practical management of publie lands and the theoretical studies put

The actual allocation of budget items is a complicated matter (see Appendix L in the PEIS for additional discussion on this matter) The Preferred Alternative places added emphasis on trails (see Plan. Chapter 4) As such. subject to final budget allocations, we are confident of an improved situation on-the-ground Other programs, such as volunteers and ERFO, have and will continue to play

aside In 1984 the U S Forest Service met only 24% of its goals for trail construction, 34% for wildlife habitat improvement. and 38% for soil and water resource improvement In contrast. they met 98% of their timber goals and 140% of their goals for road Construction	important parts in the overall trail situation on the Forest Lastly, be assured the Forest is working to reduce administrative Overhead costs in favor of on-the-ground activities
1701 Trail maintenance done by volunteer groups is a sound program We recommend assigning segments of a trail to a specific group on more or less a permanent basis or for a period of time	We agree - The volunteer program is an excellent way to accomplish trail maintenance The Adopt-A-Trail program (which has been in existence for several years on the Sequoia NF) will continue under the Preferred Alternative This program provides for long-term trail maintenance by interested groups
1702 Consider Separate trails for OHV and other users to reduce conflicts Building equestrian facilities at some trailheads is basically sound. but not at all trailheads Build horse facilities only in areas that are popular with the horsemen To encourage cross-country skiing. we Suggest designation of routes for safety and to enhance the recreation experience	These are excellent suggestions to be considered under project level planning. The Comprehensive Forest-wide trail plan to be developed under the Preferred Alternative will address these site-specific issues
1800 The present system of trails is adequate for summer use with perhaps some cleanup and reconstruction It would aid in Winter recreation if more trails were constructed at lower elevations A trail on the west bank of the North Fork of the Middle Fork of the Tule River would eliminate two river crossings which are somewhat hazardous during high water The West slope is quite steep and may be subject to slides and late snow retention	The Preferred Alternative requires that the Forest develop a comprehensive trail plan The actual decisions on new trails to be Constructed and the types of allowable use will be made during the development of that plan
1900 There are many hiking trails on the older forest maps that are not maintained and Cannot even be found I urge the USFS to reopen and maintain these trails for hikers The trails in the lower elevation, e g , Wishon and California Hot Springs are desirable for all year use and would be enjoyed by many people in our area	Specific decisions on trails which might be reopened are project level and thus Outside the scope of this general plan However, this is a specific implementation item in the Forest Plan (see Chapter 4, Forest-wide Standards and Guidelines. Trails) and, as such. will be addressed as trail planning is done
2000 Roads - maintain the current 44% of the Forest as unroaded Upgrade existing roads for safety purposes only Unneeded roads should be returned to natural conditions vice your "obliterating unneeded roads "	Roads are reactive to resource management activities Maintaining 44% of the Forest as unroaded would preclude resource management activities that the Forest Service feels are necessary to fulfill our legal obligation to provide a balance of natural resources The FEIS emphasizes maintenance for basic needs throughout the alternatives For example, see Chapter 2, Facilities (See Comment 301, Forest Service Roads. for discussion of road obliteration and restoration)

2100 The use of mountain bicycles (Self-propelled) using hiking and equestrian trails is not addressed Bicycle riding on hiking and horse trails is not appropriate The bicycles can use motorcycle trails No new trails for mountain bicycles	Mountain bikes were only briefly mentioned in the Draft Plan and EIS. The Preferred Alternative includes mountain bikes along With Other wheeled vehicles Their use will be restricted to vehicle trails No new trails specifically for mountain bicycles are envisioned.
2200 Trails must be maintained I would like to see the McIntyre Trail (from the McIntyre Tract in Camp Nelson to the Summit Trail above Quaking Aspen) be restored or relocated so that a loop from Camp Nelson. to Jordon Lookout. back to Quaking Aspen and on to Camp Nelson could be hiked or ridden Also the trail that drops Off of Slate Mountain into the Belnap Campground needs a new crossing at the Tule River I would like to see the trail from Little Kern Lake to the Kern River Ranger Station get some work. or even some relocating	See 1702 above.
2300 No abandonment of hiking trails. Abandoning low-use trails as proposed will intensify impact on remaining trails	Abandonment of some trails may be appropriate in instances where resources cannot be protected with continued use However, the Plan calls for maintaining at least the existing mileage of trail on the Forest. and provides for some increases Another aspect is to replace little used mileage with trails in locations more desired by recreationists (see Chapter 4, Plan) Trail specifics will be addressed during comprehensive trail planning
2400 The Plan documents do not include maps showing existing and proposed trails and roads. how new road Construction would affect existing trails, and how loss of existing trails to new road construction would be mitigated We are not able to determine from the Plan documents what Would be the visual or aural impacts on existing trails from proposed timber operations and new road construction. These issues should be included in the Plan in Specific detail so that their potential impacts can be evaluated before a Plan is adopted	Specifics on impacts Of other activities on trails Such as those mentioned are beyond the scope of this Plan Project-specific EA's will implement mitigation measures. including reconstruction/relocation where the management project alters or eliminates portions of the long-term Forest trail system (see Plan. Chapter 4, Forest-wide Standards and Guidelines Under Trails)
2500 I urge the USFS to actively solicit trail-maintaining person-power from the penal institutions and not incidentally take the convicts out mountain climbing	The Sequoia NP currently uses inmates and Juvenile wards on a variety of resource projects This practice is expected to continue Many resources have benefitted from the fine work of these people
2600 I an deeply concerned that your plan proposes to build fifty times as much road as trail This is not a proper priority Trail hiking is still the most appropriate national forest recreational xperience.	Roads are not contructed in lieu of trails Roads are constructed to Support multiple resource objectives which can include providing motorized access to hiking trailheads as well as many other resource management activities Please review the trail portions of the Plan for revisions in trail management Which show our recognition of trails as a

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key part of our multiple-use management responsibilities

2700 My husband and I have enjoyed many pleasurable trips hiking Sequoia and Skiing across the trails in winter Now we understand that the new forest plan. if fully implemented. would cut the forest with roads and traffic We would like to see many more hiking and skiing trails (and perhaps mid-way shelters) I'm sure that building hiking trails would be much less expensive than road building You might even be able to get free labor from environmental groups

The Forest Service has a legal obligation to provide a balance of natural resources - water. soil. forage. wildlife, recreation and wood In all of the alternatives presented in the FEIS some degree of roading is necessary to fulfill this obligation To say the Forest will be cut with roads. however, is an overstatement Roads will be Constructed, but these will be mostly Short local roads necessary to complete specific projects A network of trails (approximately 900 miles) Will also exist on the Forest, and there will be some increases in this mileage to meet use demands Volunteer efforts to assist with trail maintenance and/or reconstruction *have* been and will continue to be important to the trail program These efforts have involved both environmental and OHV groups

FIRE & FUELS, GENERAL (070)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Favors the use of prescribed fire in wilderness and chaparral management	Several alternatives, including the Preferred. allow for this management practice
200 Questions the "100 acre. 90% of the time" suppression goal in the Lower Kern Canyon - no damage will occur from larger fires.	The "100 acre, 90% Of the time" is the initial attack planning objective in this fuel type that will result in a "cost-effective" action Fires escaping initial attack can and should probably be larger and allowed to burn *to natural barriers.* Such fires are evaluated using the Escaped Fire situation Analysis
300 There Should be a 100 foot buffer zone along roads in which no prescribed burning is allowed	Areas adjacent to roads that are protected from alteration vary in width depending on road use, topography and a variety of other factors Visual Quality Objectives are assigned Forest-wide and are one of these factors
400 Areas in Which the use of natural fire is appropriate Should be identified	The Plan allows for the use of "natural fire " Specific areas will be identified and guidelines developed in the Fire Management Action Plan
500 Many Sequoia groves would benefit from natural fire	Fire, prescribed and/or "natural", can and will be used in giant sequoia groves when it is the appropriate treatment identified in a Project Environmental Analysis

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600 Human caused fires should not automatically be suppressed.	Allowing "human-caused" fires to burn involves a host of legal issues including collection for damages and/or suppression costs as well as suits against the Government. Therefore. human caused wildfires must be suppressed as per Forest Service policy.
700 Excessive chaparral burning may endanger wildlife. especially non-mobile amphibians.	Each prescribed fire will be preceeded by an EA which will address such issues and spell out procedures to mitigate this kind of a problem.
800 Limit the use of prescribed fire in Wilderness to fuel reduction work. Do not use fire to increase vegetative diversity.	Fire caused by lightning is "nature's way" of creating vegetative diversity in many ecosystems The planned use of "prescribed natural fire" simply defines the conditions (weather. risk. values. etc) under which a natural (lightning) caused fire will be allowed to burn.
900 There should be restrictions on campfires because they waste valuable wood needed in the Porest ecosystem, and are an inefficient source of heat.	There may be a need to limit the use of native wood in campfires in some heavily used areas
1000 Recommends that prescribed burning in chaparral be done in the summer or fall to more nearly match natural conditions.	An E.A. will be prepared for each prescribed burn which will determine the desired objectives. timing. and other prescription elements.
1100 Only native plants should be used for revegetation or erosion control projects	No large scale use of "nonnative" species is planned Individual projects may require seeding with nonnative species if such an alternative is selected in the EA process

FISH. GENERAL (081)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Thew are no plans for fishery habitat improvement or protection There should be a more aggressive approach to restoration and improvement of riparian dependent resources	The Forest is actively implementing programs providing for the improvement and protection of fishery habitat The Little Kern Golden Trout Management Plan has been in effect for several years providing for the protection and improvement of habitat Our Porest Riparian Standards and Guidelines are implemented on all projects affecting the riparian resources surrounding many fisheries These guidelinea provide for the maintenance and protection of riparian-dependent resources and fisheries habitat We have accomplished, and will continue to accomplish, stream improvement projects vitalizing timber sale area improvement funds (K-V) and funds from cooperative programs with the California Department of Pish and Game We also have a very active meadow restoration program to maintain and improve meadow resources which directly affect fishery habitat on the Forest Every year many acres of

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meadows are treated with rock cheek dams, seeding. erosion Cloth. and other methodologies to enhance and protect this valuable resource. The Porest is also increasing its participation with the California Department of Fish and Game Area Fish Biologists in developing plans and prescriptions providing for the protection of fishery habitat.

200 Educate the Forest user to encourage the philosophy of "limiting your kill, not killing your limit "

This policy is encouraged by the Forest Service but is more in the province of the California Department of Fish and Game Which is responsible for game laws. licensing. and education of hunters and anglers

300 The Forest should make a sincere effort to meet the Forest & Rangeland Renewable Resources Planning Act (RPA)

The Forest and Rangeland Renewable Resource Planning Act (RPA) of 1974 directs the Secretary of Agriculture to periodically assess the status of the Nation's forest and rangeland resources and to recommend a Forest Service program for management and use of these resources. This program is submitted to the President for transmittal to Congress along with a Statement of Policy. The Statement of Policy is the President's intended use of the Program for framing budget requests for Forest service activities. Congress may modify the Statement of Policy and it is then Used in framing budget requests. In that the Sequoia National Forest is a part of the entire Forest Service. we do Conform to the RPA program. It is essential to remember RPA provides direction for the entire Nation and not individual Forests

400 Increased timber harvest, especially clearcutting, and increased grazing will conflict with fishery improvement

Our current and proposed management of resources in and around fish habitat is to emphasize riparian dependent resources over non-dependent resources Such as timber harvest Our use of Best Management Practices (BMP's) and prescriptions developed through our Forest Riparian Standards and Guidelines will maintain fisheries habitat Improvement of fishery habitat will occur through erosion control projects. removal of fish barriers in some areas. planting of willows and other plants to stabilize banks and provide shade. and installing structures, such ab boulder clusters. to increase the number and size of pools All of these improvement measures are currently implemented. and will continue to be implemented, through sale area improvement funds. Forest Service appropriated funds. and cooperative funds provided by county and state agencies

Also. the final Forest Plan and EIS recommends no increase in grazing on the Forest

500 Why is there Only a 1 or 2 % increase in trout production in the WFV and AMN alternatives ? Water quality and stream protection should be much improved Is the Sequoia at near optimum production currently?	In the WPV and AMN Alternatives. the Forest has chosen to emphasize habitat protection and restoration over major improvement projects requiring increased funding. If funding is increased. through Forest Service funds or State cooperative funds. the Forest would be able to increase trout production over the 1-2% increase indicated
600 How can your report say there is no Significant fishery on segments I & II of the Kings River	We have revised the text in Table E 4 to indicate there is a significant fishery on the Kings River We believe you may have misread our text on impacts to fisheries as a result of wild and scenic river designation. Also. the Kings River. or segments of it, have now been incorporated into a Special Managment Area providing further protection.
700 I would like more fish stocked.	Stocking of fisheries is the responsibility of the California Department of Fish and Game
800 Damage from logging roads. timber harvest and grazing should be repaired and the costs borne by timber and stock users.	Where Clear, defineable damage has occurred due to violations of regulations. the responsible parties are fined and billed for restoration. Part of the timber and grazing proceeds are used for habitat improvement through range betterment projects and Knudsen-Vanderbilt (K-V) funds. Also. through the use Of Best Management Practices (BMP's) and riparian guideline prescriptions. the Forest reduces the need to repair damaged habitat through increased protection.
900 Fish and wildlife plans are O K	Thank you for your comment
1000 There should be studies made to determine what impacts road construction. timber harvest and grazing have on stream habitat and fishery resources.	Cooperative studies have been, and will be carried out with Froest Service research branches. universities. and private individuals. Past studies and research have led to the development of the Best Management Practices and the Forest Riparian Standards and Guidelines that have been developed to protect and maintain stream habitat and fishery resources Also. monitoring of our activities. although not research. constitutes a study of effectiveness of our guidelines
1100 Fisheries planning should be covered Separately from wildlife since the requirements and approaches are quite different	Fisheries planning and management is a separate function administratively in our budgetary process Some planning is also implemented separately such as the Little Kern Golden Trout Recovery Plan Sometimes wildlife and fisheries are treated in the same context. especially when riparian area management is developed and implemented.

1200 Mention should be made of the partnership of the California Department of Fish and Game for planning and management of fish and wildlife resources	This partnership is mentioned in Chapter 3 of the Plan
1300 Isn't the Little Kern Golden Trout a federally listed threatened species?	This was noted in the Draft Forest Plan p 3-49 and Table 3.5 in the DEIS. The reference in Chapter 3 of the final Plan under wildlife has been corrected
1400 Resident fish production remains nearly constant over all alternatives This ignores looking at ways stream habitat can be improved to increase fisheries (e.g., no livestock grazing in riparian zones. 100+ft. buffer zones on streams, no harvest of timber. etc). Why weren't these factors evaluated.?	Stream habitat is protected and maintained through the use of Best Management Practices and the Forest Riparian Standards and Guidelines which restrict certain activities such as timber harvesting in riparian areas. Stream habitat is improved through direct habitat improvement projects Such as stream-- bank stabilization. boulder clustering to increase the number or depth of pools, and barrier removal to allow for the passage of fish To the degree funds can be obtained. habitat improvement projects such as these will be carried out However, the Porest does feel that improvement opportunities are somewhat limited, hence the figures indicating little to no increase
1500 The plan fails to recognize the South Pork Kern Golden Trout as a sensitive species.	See revisions in Chapter 3 of the Final Plan
1600 The standards listed for the Little Kern Golden Trout are more like objectives and should be placed in the proper section standards and guidelines Should be adopted which address habitat protection for these species and the development of specific management prescriptions.	The Standards and Guidelines. and specific management prescriptions have been written and are being implemented under the direction of the Little Kern Golden Trout Recovery Plan which is available on the Forest for your review
1700 On 2-8(E) (Draft Plan) the question was what opportunities exist to improve fish and wildlife habitat. not whether the Forest plans to do any enhancement work. Maintaining fish habitat in its existing condition with the existing standards will not meet the management direction of providing increased fish habitat capabilities by 1995	Besides protecting and maintaining fish habitat through the implementation of Best Management Practices and the Forest Riparian Standards and Guidelines, the Forest is actively identifying. and. when possible. implementing fish habitat improvement projects such as meadow restoration. streambank stabilization, barrier removal. and general stream cleanup to increase fish habitat capabilities These programs will continue at their current levels or increase as funds become available to to meet the management direction of increased fish habitat capabilities on the Porest
1800 The Little Kern Golden Trout Recovery Plan is not limited to the Golden Trout Wilderness. There are 1,000 acres in the Click's Creek and Pish Creek drainages which should be identified and mare	All of the "Critical Habitat" for tpe Little Kern Golden Trout has been identified in the Management Plan The Forest Service is fully aware that portions of this designated area are outside of the

stringent standards and guidelines written for the area including the need for biological assessments on all projects	Golden Trout Wilderness and will continue to comply with Section 7 of the Threatened and Endangered Species Act.
2000 Native trout production will not remain constant through the planning period far much if not all the listed alternatives	We feel that the use of Best Management Practices (BMP), and streamside management zones, in addition to fisheries habitat improvement will maintain existing fishery production
2100 Require fish habitat monitoring as an essential component in monitoring activities such as road building in all areas where these activities are permitted Specify where fish monitoring stations will be located	Fish habitat monitoring is a component of overall monitoring of streamside management zones and riparian management as addressed in the monitoring section of the Plan

OTHER MANAGEMENT INDICATOR SPECIES (084)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The plan is deficient in planning for long term survival and does not adequately represent sensitive. rare and T&E species	Changes in text. direction. and tables in Chapter 3 of the PEIS and Plan ensures that long-term survival of all rare, sensitive. and threatened and endangered species across the Sequoia NF will be maintained Our policy is to manage sensitive species in such a way that federal listing as a threatened and endangered species is not necessary
200 The preferred alternative calls for habitat maintenance for only one pair of nesting California Condors This is underestimated	The Preferred Alternative calls for maintenance of habitat for at least one pair, not only one The Forest is a participant in the California Condor Recovery Plan All Porest Condor programs are an approved part of this process
300 Unable to find a hacking schedule (for peregrine falcons)	Refer to the "Recovery Plan for the Peregrine Falcon," 1982 This document is available for review
400 Spotted owl and northern goshawk received short attention in the draft plan Inventories are incomplete	See changes to the FEIS and Plan that show the Forest is following Regional Guidelines Inventories for Spotted owls were accelerated in FY 1987 Additional inventories. monitoring. and research are Scheduled over the next 4 years Please refer to Chapter 3 of the Final Plan and Appendix B of the FEIS for expanded text on Spotted owl management
500 S O M A network is not enough	Adjustments to the network may be made as a result of inventories. monitoring. and research on spotted owls and their habitat These activities were accelerated in 1987 and are expected to continue in an accelerated node through FY 1991 Also, we estimate that there is habitat capability to Support approximately 35 pairs at this time in addition to the network of 40 SOHA's

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600 The plan should provide for inventory and management plans, and more specific standards and guidelines for T&E, rare and sensitive species	See changes to the Plan in Chapter 4, Forest-wide Standards and Guidelines
700 The Kern Canyon end Tehachapi Slender salamanders should be monitored annually	Salamander monitoring is done on a project basis within the species range to assure species viability is maintained
800 Goshawk nest requires at least 125 acres to be preserved	The Forest follows regional guidelines Which recommends 50 acres
900 Species that benefit from intensive. even-age timber management practices will perhaps flourish but at an Unacceptable great cost to many species that will decline	Some decline for older seral species will occur in intensively managed areas. but these same Species are provided for in areas such as wilderness. RNA's. riparian areas. etc The Forest will ensure that viable populations for all species will be maintained by providing habitat for these species
1000 M I S definition in appendix "J" (EIS) includes plants. table 3-16 does not	See changes to FEIS Table 3 16
1100 Research need section in appendix "B" Should include status and trend needs for great gray owl, willow flycatcher. golden eagles. Breckenridge MT salamander, and goshawks	See changes to Appendix B of the Plan. Research Needs
1200 There is no mention of wildlife resources in the vision statement	See changes to the vision Statement in Chapter 1 of the Plan
1300 Wildlife deserves a greater emphasis in allocation of Forest resources, dollars. and personnel	The Forest has a large number of Users each with diverse opinions on the allocation of the public resource The Land Management Plan attempts to meet a reasonable balance of resource protection and public needs
1400 The Forest plan should be directed to meet the (deer) herd unit objectives for those deer herd plans approved by the Forest	The Plan directs that on key deer areas the Forest will follow the herd plan
1600 I do not agree with your management of Mountain Lions	This is outside of the scope of the Plan, the letter was given to California Department of Fish and Game The Forest Service manages habitat. the management of species is the responsibility of State agencies

OTHER WILDLIFE SPECIES (085)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 How can the Forest adequately manage and monitor fish. wildlife. and other earth science resources	We have little control over budget allocations but are seeking ways to work with the California Depart-

when positions in wildlife. hydrology, fisheries. and soils have been cut as well as the budget for the management of these resources?

ment of Fish and Game and other cooperators to jointly accomplish the objectives in this Plan The Plan points out what types of habitat improvements and monitoring needs are required, but ultimately the available funds will dictate how much can be accomplished in a given year In an effort to maintain current staffing levels. the Forest recently filled Hydrology and Soils positions. a Wildlife Biologist position, and a Shared services Fisheries Biologist position with Sierra National Forest A monitoring system is Currently being developed by the Stanislaus. Sierra. and Sequoia National Forests end the Pacific Southwest Forest and Range Experiment Station that will concentrate monitoring efforts on high risk Species and associated habitat This will narrow the focus of monitoring and more realistically address what Studies can be accomplished with current and projected staffing and budget levels Also refer to Appendix L of the FEIS for further explanation of how the budget affects forest management

200 Wildlife is an important resource on the Forest and should be given eo-equal treatment rather than the assumption that it will be protected as a by-product of recreation use. and timber and range management

The Forest Plan. rather than stressing commodity over "on-commodity mangement. actually provides for increased protection and management of several important habitat types including old growth. riparian. dead and down. snags, and oak managment Please refer to revised Forest-wide Standards and Guidelines in Chapter 4 of the Final Plan

201 Riparian areas and meadows have an importance to wildlife which is highly disproportionate to their limited acreage Conflicts for use of this limited acreage are between grazing, timber harvest. OHV use, recreation, and wildlife, and yet the F S proposes a Significant increase in the first 3 mentioned

Increases in grazing. timber harvest. and recreation will not occur at the detriment of riparian areas and meadow habitat Any management activities altering or impacting the habitat in the areas will comply with the Forest Management Guidelines for Riparian Areas and Meadow Management Guidelines which limit the amount and kinds of activities that can take place

202 Deer seem to be overemphasized where cattle and wildlife must compete for the same area Cattle ultimately prevail since they have man's assistance as well Mountain meadows are needed during the fawning season If adequate food supplies are unavailable, the number will diminish accordingly

Cattle grazing seasons are adjusted on the Sequoia NF to allow deer to use the mountain meadows during the majority of the fawning season

203 Meadows should be managed for recreation and wildlife. NOT livestock The FS projects increased benefits to wildlife by elearcutting and chaparral management, but at the same time they propose to increase livestock grazing in the areas to the detriment of wildlife

Under the Forest Service Multiple-Use Management. meadows are managed for many uses which include providing wildlife habitat. protecting water quality. recreational experiences. and livestock grazing. It is the intention of the Forest and the Plan to strike a balance between commodity and non commodity uses for the meadows Following timber

	(085) harvesting or prescribed burning of Chaparral. cattle may be drawn to these areas because of increased forage capacity, but this does not exclude benefits to wildlife
401 Full preservation of wildlife habitat The Plan states "Because of the losses of habitat outside the Forest due to urbanization. wildlife species are becoming more dependent upon the Forest " (Part 3, p 19) Yet the plan would disrupt and decrease wildlife habitat No trapping. no predator "control" Reintroduction of species formerly native to the Forest but now absent	There are several points to make here The National Forest Management Act requires that this plan Shall "provide for multiple use and sustained yield of goods and services from the Forest in a way that maximizes long-term net public benefits in an environmentally Sound manner " This direction precludes the possibility of preserving the entire Forest for pristine wildlife habitat Next. the management activities proposed in the Plan will alter wildlife habitat, increasing some habitat types and decreasing Others Finally. with the exception of controlling gopher populations in tree plantations. the Forest *service* is not responsible for the trapping of animals. predator control. or the reintroduction of species formerly native to the Forest. but now absent The California Department of Fish and Game is responsible for those wildlife management activities on the Forest. except for threatened and endangered species which are the responsibility of the U S Fish and Wildlife Service
500 The Plan removes too much old growth and is slanted towards creating young successional stands at the detriment of wildlife	Although the Plan does propose harvesting old growth stands. there are many provisions to protect a portion of this valuable wildlife habitat type Old growth located in the wilderness. riparian areas. and scenic corridors will be protected Five percent of the old growth in each timber compartment will be retained Forty Spotted owl habitat areas. each containing 1650 acres will be maintained (these habitat areas contain mostly old growth habitat) The old growth present in the recommended Research Natural Areas and Botanical Areas will be preserved The protection of all these areas will insure old growth dependent Species will be maintained above viable population levels and maintain their distribution across the Forest
600 The provisions made in the Plan for the retention of snags and dead and down material are inadequate in providing habitat for wildlife species dependent on these habitat elements	Please refer to revised Forest-wide Standards and Guidelines concerning snags and dead and down material These revisions were negotiated with the California Department of Fish and Game
700 Wildlife monitoring is totally inadequate Has the Sequoia followed the monitoring guidance provided by the Pacific SW Range Experiment Station	Plese see the expanded Monitoring Section

biological staff. Please provide their analysis for review. The Sequoia monitoring plan is much less intensive than seen in the Stanislaus Plan Why isn't there more consistency between Forests?

701 It is not clear in the DEIS as to the components or factors used determining species viability and habitat carrying capacity. Have the latest available data and techniques been used?

Please refer to information provided on this subject in Chapter 3 and Appendix B of the FEIS.

900 I disagree with much of the data base information used to draw conclusions and formulate plans On pg 3-19 you report 43,000 consumptive WFUD's My information Shows 16,600 deer tags alone issued.. with an average of 6-1/2 days usage per tag. or a total of 100,000 WFUD's I am told them are approximately 3 times as many fishing licenses sold Please advise what data you used to arrive at your figures

Wildlife and Fish User Days (WFUD's) are not simply a function of multiplying the number of licenses sold times days of use Refer to Appendix B in the FEIS for a detailed explanation of how WFUD's are determined

1000 If the plan is implemented. it will result in major reductions in fish and wildlife resources All alternatives are unacceptable from a fish and wildlife stand point The AMN alternative is also unacceptable since old growth species Show a planned major reduction. grazing still continues above the current Forest capacity and more roads and ski projects are planned

The AMN Alternative does not show a "major" reduction nor is grazing above current capacity Fish and wildlife resources are an important multiple-use on the Sequoia NF Revised Standards and Guidelines in the Final Plan ensure that viable populations of all native plants and animals will be maintained on the Forest

1001 The data base used in preparing the Plan is flawed and that errors and exaggerations must be corrected by improving the Forplan model and Other data between the draft and final EIS

We find this statement too general for a specific response

1002 The conflict (between wildlife and Other resources) can only result in taxpayer losses in terms of dollars and resources

Several areas on the Forest will receive wildlife emphasis over other uses In addition. timber and recreation also are emphasized in portions of the Forest The final Forest Plan provides for a mix of commodity and non-commodity values consistent With the theme of the alternative Both are important in multiple-use management

1003 Roadless areas should remain unroaded to provide recreation, wildlife habitat. biological diversity and other benefits that will be in Shorter supply in the future Nan-consumptive use of wildlife bird-watching. photography, and animal study was responsible for 67.000 WFUD's (3-19 Plan) This confirms our opinions regarding the value of wildlife in the Forest economy

A large number of areas will remain unroaded Non-consumptive uses of the Forest will remain available over most Of the Forest under the recommended Plan

1004 Unless we dramatically alter our current practices. the earth will lose a large share of its species during our lifetime A desirable goal would be to return the Governments full cost of growing and selling trees by halting uneconomical timber sales.

When permanent road investments are considered as assets, timber sales in the Sequoia return the full Cost of selling trees Timber purchasers are required to pay the government the cost of reforestation of timber sales

1005 No grazing of livestock should occur on lands that serve as winter range for deer

Grazing seasons are adjusted in some areas for the benefit of deer management There are very few areas where a conflict can clearly be shown on deer wintering areas

1006 Regarding the exotic plants and animals, the dictionary defines "exotic" as foreign or imported In other words. the bear. deer. fox, racoon, woodpeckers, goshawks. and condors, plus our native plant eco-systems and their native habitats about which we are concerned, are exotic to these timber people. Do they expect us to believe that the public feels that plants and animals and birds don't really count for much on our public lends?

We consider native plants and animals to be an important renewable resource on the Sequoia NQ Throughout the document, we have planned for maintaining viable populations of all species

1007 While all wildlife. including rare and sensitive species would be seriously impacted by the proposed Plan. we will here mention only the birds Nationally, Bong birds are on the decline. traceable in part. to the destruction of the Forests an Which their survival depends

NO sensitive. rare, or threatened and endangered species will be seriously impacted The final Plan provides for the maintenance of all native species and viable populations Standards and Guidelines far wildlife. riparian. meadows, old growth, etc ensures that wildlife is adequately managed on the Sequoia NF.

1008 I'm concerned about the National Park issues coming before Congress We need support and protection of wildlife and their habitats

We have no authority regarding National Park issues.

1009 More backcountry roads will certainly increase wildlife harvesting since these areas will afford easy access to "road hunters " Too much ready access by road by too many hunters

We concur With the first statement We have no technical response to your opinion expressed in the second statement. To protect wildlife habitat, many timber mads will be closed after harvest

1010 And what about wildlife? In the last half Of the century. the extinction rate has more than doubled at a rate that is the highest of all time' More and more species are fighting their species Battle of Armageddon This rate is not because of natural selection: it is because of the encroachment of people. and loss Of habitat because of land ethic We're going to be all alone on this planet Would Sequoia or Chief Seattle desecrate our holy places with an off-road vehicle? Would they kill little squirrels. baby birds, and lizards for the selfishness of a moment. a cheap little thrill? Would they want cattle to eat away a sacred and holy place? Would they allow giant earth-movers to rape

See response to #1007

and scrape away forever the floor of this cathedral. this ancient. timeless forest?

1011 This is (DEIS) not a fair presentation of alternatives. and reminds one of the unfair range of alternatives which the FS produced for RARE II in California which was held by the courts to be fatally inadequate The forest should read carefully the observations by the court in California vs Block and completely rewrite the alternatives to present a true range of alternatives for consideration

In our judgement we have presented a full range of alternatives Varying from emphasis on market commodities to emphasis on nonmarket goods

1012 The SQF is home to a great diversity of wildlife Over 300 species of terrestial vertebrates inhabit a variety of habitat types on the Forest The Forest provides habitat for 3 Federally listed endangered species. the California Condor. the Bald Eagle. and the Peregrine Falcon In addition. 3 State listed "rare" species and 5 species considered "sensitive" by the FS depend on the SQF for habitat. As urbanization and habitat loss increase outside the Forest, wildlife will became more dependent on the Forest

See response to #1007

1013 The sportmen make up alot of money in the State You don't see out of state hunters coming to CA You don't see them coming here because we are so far down in hunting that you can't believe it When you bring in deer to replant deer in an area, over half of them die because they are not used to the food in the area

We have no technical response to this expression of opinion

1014 When you are tearing down all the manzanita, it handles a lot of protein for so many critters to eat. you can't believe it When you are grazing the mountain meadows. be careful When you cut down all the oak trees and take them out and theres nothing left for any of the wild critters, be careful

For the majority of this comment we have no technical response For the portion of the Comment directed at oak management. refer to the Forest-Wide Standards and Guidelines pertaining to hardwood management in Chapter 4 of the Plan

1015 Management Direction, Chapter 4, Future Condition of the Forest Overall comments - I do not agree with the DEIS Preferred Alternative and therefore the future condition of the Forest as Stated in this Management Plan If Your Plan is implemented, it will be a dark day in forest management You will have degraded one of the few remaing pristine Forests in the West and turned it into a beef. timber. OHV. and mini-downhill skier haven Your general approach seems to be abandoning increasing quality and maintaining or decreasing it instead in terms of air, Water. wildlife. visual

The Forest has tried to present a balanced program to meet the needs of the public Pristine areas are preserved for some. while other areas provide high quality beef. lumber and recreational opportunity

(085)

1016 It is extremely Important that adequate space be provided for population growth and maintenance We strongly urge that space be included as one of the habitat elements Please see pages 3-52 of the DEIS Several Sensitive species are mentioned in the DEIS The Pileated woodpecker is not mentioned anywhere This species requires old growth forests for continuance of its kind Other species that will be adversely affected by the reduction Of old growth are the Spotted Owl and the Northern Goshawk We feel that the DEIS does not adequately provide attention to the above species particularly the Spotted Owl	Space is considered as a habitat element in Chapter 3 of the FEIS The pileated woodpecker is classified as a Special Interest Species by the Forest Service. not a Sensitive species, and consequently there are no special management Considerations Its habitat needs will be met by the Plan's provisions for the retention of 5 percent old growth in each timber compartment and special management of riparian and meadow influence zones Please see expanded portions of the FEIS and Plan for details of the management of the Spotted Owl and Goshawk
1017 Preservation of wildlife should have top priority Special interests that have a negative impact on wildlife should be eliminated within the next 5 years	We are mandated to provide a balance of uses to meet public need rather than dedicate the Forest to a single use
1018 It is folly to believe that building more roads and increasing timber harvests will enhance or even maintain existing populations of wildllfe that these activities will not degrade recreational experiences dramatically. and that recreation based economies in the *area* will not suffer significantly The FS underestimates the dollar value of fish, wildlife, and recreation while at the same time. the Plan underestimates the damage that timber production Will cause	The Forest Service recognizes the Value of fish, wildlife and recreation and wlll continue to provide for these uses to the public Timber harvest does not preclude other uses of the Forest and has been in part responsible for increased recreational *use* due to increased *access*
1019 In plans, we saw management for everything attempted except wildlife	Please refer to Chapter 4 (Management Direction) of the Plan Where Specific Forest goals are outlined as to the management of fish and wildlife
1020 The Sequoias emphasis on timber and range outputs (which provide only 20% of the Forests PNV') is clearly inconsistent with the intent of Current law, regulation and FS Manual direction	The Plan complies with Current laws, regulations, and FS Manual direction
1021 The prefered alternative is too expensive and should be pared back in facilities. transportation. and timber expenditures. increased in fisheries and wildlife and better balance	We have attempted to provide a good balance subject to the needs of the public through revisions of the Preferred Alternative This Alternative is developed in the Final Plan It is the result of public Comment to the Draft EIS and Plan Please refer to the expanded sections on wildlife management in Chapters 3 and 4 of the final Plan
1100 Do *you* have any research data to verify that secondary poisonings are not a problem with baiting gophers with strychnine'	There is much research documenting this aspect of gopher baiting For Instance. refer to publications cited in the programmatic environmental analysis entitled "Gopher Control for Reforestation on the Sequoia National Forest. Part A", March 21. 1984

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Secondary poisoning is not likely because. (1) bait is applied underground and gophers die underground. (2) strychnine is not water soluable, and hence does not leach out of the bait. and (3) soil organisms rapidly decompose strychnine.

1101 If the ban on herbicides is lifted. broadeast spraying should be banned because so many non-target species are killed

Presently there is a suspension on herbicide spraying in Region 5, pending the completion of a vegetation management EIS 2.4.5.T is no longer registered for Forest applications. We only use herbicides which have been registered for the application intended and approved by EPA We carefully Select chemicals to best target those plants which compete with young tree seedlings. The chemicals are then carefully applied using EPA and OSHA approved methods. Care is taken to minimize over-spray and drift. The normal application rates of herbicides Used on forest lands are not likely to produce acute toxic responses in most "on-target organisms The short persistence. lack of biomagnification in food chains, and the rapid excretion of these herbicides by animals preclude toxic doses being accumulated The primary effect of herbicides on wildlife results from changes in the plant component of their habitat. Only a small portion of the forest will be sprayed each year under the PRP Alternative (if the suspension is lifted) In the PRP Aleternative. approximately 136,000 acres are managed intensively for timber (table 2 28, Item VII A, FEIS) In the first decade approximately 1700 acres will be clearcut each year (table 2 21, FEIS) That's 17.300 acres per decade. Each clearcut acre might get sprayed with herbicides two to three times over its century of life Therefore. 51.000 acres are likely to be sprayed in a decade if the herbicide ban is lifted. i e , 5,100 acres per year will be sprayed with herbicides This is less than 0 5% of the total National Forest land

1200 On page 4-3 the Plan provides that it will protect only "selected" invertebrates The plan fails to tell Which invertebrates are selected. why and who will do the selecting? On page 4-7 the Plan talks about a decrease in "late succession state animals " This is an unacceptable vague statement Does this in fact mean that there will be less bear. deer and Other "popular" mammals under the current Plan? Also, how much of a decrease? why were specifics ignored from the Plan?

Please see revisions to the wildlife section of Forest Goals in Chapter 4 of the Plan Your assessment of the wildlife text is partially correct There will be a decrease in species associated with old growth. mast producing trees and snags Estimetes of the percentage decline in population are given for each alternative in Chapter 4 of the EIS and the summary The revised plan does provide for increased management and protection of snags and oaks on commercial timber land and 66.000 acres of Undisturbed habitat associated with spotted owl habitat areas Old growth habitat will still occur All species associated with this habitat will retain viable populations under the final Plan

(085)

1300 You have greatly underestimated the impacts of oak loss to wildlife.	Please refer to revised Standards and Guidelines and area prescriptions in the Plan providing greater protection and management of oak habitat than currently exists on the Forest
1301 DEIS should clearly state. in laymans terms, (as required by NEPA) how Fish and Wildlife values were treated in Forplan	Please see Appendix B of the FEIS for a detailed description of modeling elements.
1400 Reptiles and amphibians are ignored in the destruction of forest floor habitat, e.g , calls for dead and down wood. firewood removal. slash reduction, and controlled burns	Fire has been an integral Part of Forest ecosystems for thousands of years The use of fire may impact an individual population of reptiles or amphibians, but it will not affect the species throughout its entire range
1401 I have serious concerns with the Sequoia data base on which it can Support the contention that the preferred alternative will result in maintaining '"Viable populations of wildlife." There are many good examples showing weakness in your analysis, but the best may be your totally ignoring the herpetological fauna found on the forest	Management of wildlife habitat, as addressed in the Plan. means that all wildlife, including reptiles and amphibians, Will be maintained at viable population levels. Three herpetological species. the Kern Canyon Slender Salamander. the Tehachapi Slender Salamander. and the Southern Rubber Boa are recognized in the Plan as State-listed species and will be managed to maintain viable populations throughout the species range
1500 1 do not like either the AMN or WFV alternatives because they will have negative impacts to wildlife habitat.	Thank you for your comment

SPOTTED OWL (086)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
loo Your habitat areas for spotted owls are too large and are detrimental to commodity production. More research is needed to determine the Status and needs of this species	Please see the explanation of the management of this species under the Management Indicator Species section of Chap 3 of the FEIS and Plan. Research activities to determine habitat requirements are Scheduled in the Spotted Owl RD & A Program
200 The data in the Forplan Modeling on spotted owls is inaccurate and misleading in its assumptions of what constitutes adequate habitat and its conclusions of how many pairs of Spotted owls the Sequoia National Forest will support	These numbers were hypothetical and were not adjusted for fragmentation. In the final Plan we have updated the spotted owl section based on vegetative conditions, recent owl survey Work, and habitat knowledge for this species Changes occur in all tables displaying spotted owls.
300 Region 5 guidelines in Appendix H of the final EIS for the Pacific Southwest Regional Guide States that "specific numbers of owls must be verified and monitored during plan and implementation " The Guide also requires the Sequoia and most other CA forests to group spotted owl territories into a network covering the range of the owl and to prepare a map of all "Identified and/or suspected locations of	Spotted owl population surveys have been conducted on Sequoia NF since the 1970's Beginning in 1982 work began. using Region 5 Guidelines. to establish a network of Spotted owl habitat areas across Sequoia NF In 1986, with the Completion of field surveys on the CANNELL MEADOW DISTRICT a network of habitat areas was established The only harvest of timber that has taken place in any of the habitat

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territories." Sequoia planners have yet to comply with either suggestion. As a result of this negligence. most locations of spotted owls on the Forest remain unknown to planners (this means that many Current and future timber sales will inevitably and unnecessarily impact the populations of spotted owls and Other bird/mammals Which Utilize Old growth habitat)

areas since their proposal was that already under contract In many cases even this timber was substituted for timber volume located outside of the habitat areas Congress provided funds for an accelerated research effort for spotted owls in FY 1987 The Sequoia NQ has participated in this effort Minor adjustments may be made in the total number and location of spotted owls as a result of new inventories and/or update Of habitat modelling For more details on Current spotted owl management on Sequoia NP please see Chap 3 of the FEIS or Plan Also see Appendix B of the Plan for identified research needs for the spotted owl

400 The spotted owl was classified by the Forest Service as a "sensitive species" in 1975 This classification requires positive management procedures with the aim of preventing further reduction of the existing population, or any habitat loss which would diminish the possibility of restoring the species to its present range.. We believe that the contemplated reduction of Spotted owl habitat and attendant loss of breeding pairs threatens an irreversible loss of species diversity on the Seauoia National Forest

The Forest has taken positive steps to insure spotted owls are maintained in viable numbers over their range Under the direction of Appendix H of the Pacific Southwest Region QEIS on Regional Standards and Guidelines (Regional Guide). the Sequoia National Forest has established a spotted owl habitat network This network consists of 40 Spotted Owl Habitat Areas. 1,650 acres in size or larger. distributed throughout the Forest The best available habitat. including some Old growth and mature forest areas, was included within the network as directed by Regional Guides These measures will ensure that islands of old growth will be protected and distributed across the Forest contributing to the plant and animal diversity of the Sierra Nevada

T & E SPECIES (FAUNA & FLORA) (092)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The plan does not include a Bighorn Sheep, Tule Elk, or Pronghorn relocation plan	Relocation of these species is the responsibility Of the California Department of Fish and Game We are cooperating with them an a survey of potential areas for relocation of Bighorn Sheep Tule Elk end Pronghorn were probably not native to the Forest and no plans for relocation are intended.
200 Transer Pixley pasture to S.S.P. and W.S	Effective 11/18/87. the Secretary of Agriculture transferrd this property to USDI for addition to the Pixley National Wildlife Refuge.
300 Little Kern Golden Trout must be protected wherever they are found.	The Little Kern golden trout is a federally listed threatened species for which a recovery program has been prepared. The Forest will follow that recovery program in an effort to increase numbers of Little Kern golden trout

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400 More specific standards and guidelines should be developed for T&E species	Please see Changes to the Standard and Guidelines sections of the FEIS and Plan.
500 T&E inventories are incomplete	Please see changes to Research and Technical Needs Section (Appendix B) of the Plan
600 The little Kern Golden Trout Recovery Plan is not limited to the Golden Trout Wilderness There are approximately 1000 acres in the Clicks and Fish Creek drainages outside Wilderness if my memory serves me correct This area needs to be identified and more stringent standards and guidelines written for the area including the need for Biological Assessments or USFWS Biological Opinions on all projects to determine compatibility with LKGT The LKGT Plan at last reading contains very limited discussion of fish habitat management Maintaining fish habitat in its existing conditions with the existing standards and guidelines will not meet the management direction of providing increased fish habitat capabilities on the National Forests by 1995	The 1,000 acre area you mention is included in the LKGT Management Plan and projects here must meet with the approval of the USFWS Maintenance of the current fish habitat capability is the best management we can provide given current budgets and demand for goods and services from the Forest

SENSITIVE PLANTS (096)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Planning alternatives do not compare treatment of rare plants.	Rare plants are protected under all alternatives as a Management Implementation Requirement (MIR)
200 The F S has not yet adequately explored or emphasized monitoring techniques of sensitive plants	Please see changes to PEIS and Plan under Standards and Guidelines. and research needs
300 Inventory and management plans need to be written for sensitive plants	Management Guides Will be written on a priority basis for those species Occurring in Intensively managed areas Funding and obtaining necessary ecological data needed to develop a species guide will affect the rate the guides are completed
400 Signing of sensitive plants is inappropriate and trails and roads should be rerouted	Signing Will be addressed in individual species management guides Trails and roads Will be rerouted as needed
500 The plan is vague as to what the specifies (for management) are to be for sensitive plant species	Please see revised sections of FEIS and Plan, Standards and Guidelines
600 M I R 's on page 2-26 (EIS) does not mention fish, amphibians. reptiles. mammals, or birds.	This paragraph is titled "Sensitive Plants " Fish, amphibians. reptiles, mammals, and birds are addressed later in the chapter

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700 Please include the following taxa on page 3-20 (plan): Phacelia nashiana, Calochortus straitus, Carex tompkinsii, Mimulus pictus	Phacelia nashiana and Carex tomkinsii are listed in the revision in Chapter 3, PEIS. Calochortus striatus and Mimulus pictus are no longer listed as Forest service sensitive species
800 The M.I.S.'s selected cannot possibly reflect the Status of sensitive plant species or their habitat.	All sensitive plants listed for the Forest are protected. Since sensitive plants occupy so few acres on the Forest, selecting them as an MIS species was not appropriate Sensitive plants are conserved at the project level to ensure species viability
900 How will sensitive plants be protected in rangelands or in chaparral stands slated for burning?	Sensitive plants are surveyed for and protected under each project E.A when burning is planned
1000 A conflict exists between (EIS) table 4-20 (risk factors) and page 4-50 (all plants to be protected) What are tolerable levels of impact and what are they based on?	Risk factors have been eliminated All sensitive plants are fully protected
1100 How much area will be managed for sensitive plant species?	The area to be protected for each species will be defined in the species management guides
1200 Sensitive plant species should be managed to ensure they do not become threatened and endangered	Sensitive plants are managed to eliminate the need for federal listing as a threatened and endangered species
1300 Why have not sensitive plants been federally listed if threatened and endangered?	Sensitive plants are fully protected and managed to prevent the need for federal listing as threatened or endangered Current populations are, in general. not limited enough to require Federal or State listing

HERBICIDES (111)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Carbaryl and strychnine usage should be restricted to those areas in Which endangered predators will not eat the poisoned animals Usage of toxics within the forest should be as a last resort. as the concept of integrated Pest Management indicates	Use Of all toxic substances is controlled by EPA approved procedures that ensure minimum exposure of "on-target species
300 The use of broadcast herbicides can have obvious drastic effects on native plants. whether or not they are the target species	Protection of native plants depends upon the management objective for any particular site Where control of vegetation is necessary to establish timber crops, native as well as alien plants may very well be the targets in herbicide application projects
400 . The Forest Service's Preferred Alternative does not adequately address their proposed use of herbicides/pesticides for vegetation management .	A Region-wide environmental impact Statement Will have to be completed before pesticides are used for vegetation management on the Sequoia National

Forest. This document is now in draft form. It describes a wide range of environmental consequences resulting from both the use and nonuse of pesticide$ Project-level environmental assessments (EA'S) will document the decision to either use or not use pesticides on specific Sites within the Porest These EA's will disclose site-specific environmental consequences and Will define miti- gating measures necessary to keep impacts from pesticide application at legal and environmentally acceptable levels.

800 Please detail the herbicides contemplated for use in the Sequoia National Forest Management Plan Would you also provide copies of studies showing that there are no adverse effects to the soil. fisheries. or human and agricultural use of the water runoff of these herbicides? ..

A Region-wide environmental impact statement will have to be completed before pesticides are Used for vegetation management on the Sequoia. This document is now in draft form It describes a wide range of environmental consequences resulting from both the use and nonuse of pesticides. Project-level environmental assessments (EA's) will document the decision to either use or not use pesticides specific Sites within the Porest These EA's will disclose site-specific environmental consequences and will define mitigating measures necessary to keep impacts from pesticide application at legal and environmentally acceptable levels.

900 Our vegetation control programs are abysmal if we have to resort to the Spraying of chemicals that are so hazardous that they are not allowed to the homeowner .

Most herbicides used in forestry applications are readily available for use by homeowners A few are simply unsuitable for gardening and are therefore not registered for that use In no Ease are the commonly used forestry herbicides so toxic that they are not permitted to be used by homeowners

1000 I understand that logging companies are responsible for the cost of replanting clearcut areas The first replanting is not always successful The taxpayer should not have to pay for each successive planting

As with any agriculture crop. some mortality of planted trees is expected as is an occasional failure of an entire plantation Our experience with artificial regeneration shows that technology is available to keep such failures well within tolerable limits as defined by minimum timber growth goals Because of a relatively low failure rate, and the unpredictable nature of failures. it would not be practical to hold the purchaser of Rational Porest timber responsible for Work that may or may not be needed in the future

GEOLOGY & SOILS. GENERAL (120)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Is increased erosion acceptable'	Our goals In managing the Forest are to maintain the long term productivity of the Forest's soils and to prevent any significant reductions in water quality We are committed legally. morally. and professionally to meeting these goals Consequently, we designed each of the alternatives to meet these

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goals Some of the alternatives would result in less soil erosion. but all meet our goals of protecting soil productivity and water quality

200 Since the AMN Alternative is much better in terms of soils than the PRF. WFV. or CED Alternatives (Table 4.15), should it be discussed separately (p 4-29)?

Please refer to the next to last paragraph on page 4-29 of the *DEIS* which states: "Low amounts of ground preparation for reforestation, low amounts of disturbance from timber harvest. and high amounts of prescribed fire produce the positive effects *on* soil productivity in the AMN Alternative The AMN Alternative has a high likelihood of maintaining long term soil productivitiy."

300 Is erosion damage done by OHV's acceptable?

We are very sensitive to the potential for OHV use to cause erosion damage That is why we have gone to great lengths to regulate the use of OHV's on the Forest so that the effects are localized and minimized We do feel. however. that we can provide OHV Opportunities without causing unacceptable resource damage

400 Recommended warding change in Management Direction. Chep 4 Water, Soil and Air - Add the following goals Increase water and air quality to high quality sustainable levels through an aggressive program of management and regulatory action Change the following goal 3) Improve stream ecosystem

The first goal for water. soil and air is to maintain and not degrade these resources This should not be changed This section does address improvement of soil productivity and water quality protection In these *situations* where the *resource* is not meeting quality standards and/or the opportunity exists to improve the resource quality. the Forest Service has aggressive programs as stated in Section F Forest-Wide Standards and Guidelines

500 Should projects be allowed on slopes steeper than 60%?

We feel that we can manage lend Steeper than 60% Without significant environmental impacts by use of careful project planning and implementation Our recent experience harvesting timber on the Sequoia NF on lands over 60% has proved this to be the case There are some excellent examples on the Hot Springs R D involving cable logging. broadcast burning. and planting

600 Should new timber roads be returned to a natural condition by the purchaser immediately after use at no east to the Government?

Indeed where this is possible, this is Current policy and practice However, it must be remembered that many new roads are needed after the initial harvest for reforestation activities. future timber harvests. and other Forest management activities Our overall policy is to obliterate unneeded roads at the least cost to the Government possible

700 Will funding be Sufficient to provide for the level of watershed protection and rehabilitation proposed in the Plan?

The level of funding available in any given year for any activity is governed by our annual budget which Congress approves For an explanation of the

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relation between costs projected in the Plan and that annual budget please see Appendix L Appendix L PEIS. may be further assistance

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The Native American Heritage Commission is mandated to preserve and protect places of special *religious or cultural* significance to *Native* Americans It ha6 the responsibility of assisting Native Americans in cemetery and burial protection Should human remains of Native American origin be encountered during the project. we request that the County Coroner's office be contacted To mitigate potential impacts to California Indian ancestral burials and other Cultural resources during the course of this project. we request that you consult With Indian individuals and/or in the project area	The Sequoia National Forest has initiated, and will continue consultation with. Native American groups with *cultural* and *historical* ties to Porest lands regarding potential project effects Forest policy requires that the Coroner's Office be notified if human remains are discovered on Forest lands The Coroner's Office. in turn, is responsible for determining the age and ethnicity of the remains and then notifying the Native American Heritage Commission. if necessary
200 Certain areas of the Sequoia NF Show an important living part of our National heritage that should not be allowed to disappear from the American scene Present day cattlemen continue to operate and manage their livestock in much the same way their ancestors did over one hundred years ago They use the same cow drives and inhabit the same cow camps with very little change Use Of mountain meadows by cattlemen has occurred for over one hundred years. Summer range is essential for year-long operation. and ranchers depend on this grazing to support their herds during the summer Surrounding communities depend on dollars generated by a healthy cattle industry. This living example of our western history should be preserved Historical buildings associated with stock use, early packing use, and Forest Service use should be maintained and preserved as a living part of our heritage for future generations to *see* and *use* Whatever plan is implemented by the Forest Service. it should live within budget limitations The cost of the final plan should be reasonable from the point of view of the public who has to live within budget restrictions There needs to be some assurance that money obtained from forest uses will be put back into the forest and that as the Sequoia NF proposed budget is cut, uses such as recreation and wildlife do not suffer because of over emphasis on commodities	The Forest is committed to the preservation and management of all cultural resources. including those historic sites associated With the ranching industry All project areas are inventoried far cultural resources prior to project initiation If cultural resource sites are found. they are recorded and appropriate protective measures are devised in consultation With the State Historic Preservation Officer The matter of budgets has been a concern as the Plan has been developed The Final Plan represents a balanced program for which budget projections have been developed by the computer program FORPLAN These estimates are based on a number of factors In actuality. the budget process is very complex Appendix L has been added to this FEIS and contains a discussion on the budget which will help one's understanding of this matter
300 Surely the example Of the mining companies in the lands of the Navajo end Hopi Cannot be brushed aside when considering the current proposals for the future of the sequoia National Forest	Cultural resources and Native American concerns are fully considered in project planning as required by law and Forest Service policy

400 The inventory of cultural sites should be expanded as rapidly as availability of manpower and finances will permit Vandalism occurs Often end permitting more OHV use will no doubt aggravate the problem

All proposed project areas including OHV trails are inventoried for cultural resources during the project planning phase At that time the potential direct and indirect effects of the project on cultural resources are considered and mitigative measures devised Vandalism of cultural resource sites is recognized by the Forest as a serious management problem Unfortunately. the only sure way to eliminate vandalism is to eliminate public access to Forest lands This is not, and never will be, an option The Forest Will continue to educate the public about the importance and fragility of their cultural resources, while prosecuting vandals as required by law

500 Understand that some of our western heritage must be preserved along With the environment Allow for areas where ranching, grazing and some mining may continue Recognize that 100% of the population uses wood and wood products and that timber harvesting is necessary and must come Prom someone's forests Use alternative management techniques Such as mutually agreed upon zoning restrictions on developed private property near sensitive areas Understand that budget and manpower resrictions are going to require a broader base of support Seek out private and pulic communities that are using and living near the forests Finally let us do all of this by creating citizens committees made up of local leadership with public and private interests Include them in helping you determine the best environmentally sound management practices for public lands This will create understanding. cooperation and a resolve to support and care for the forests by all people. I believe that this is one way to put democracy back into the process of public land use and planning

Thank you for your comments. Certainly communication will be an integral part of successful long-term management of the Forest We routinely work with many people who have an interest in the Forest We are always available to work with anyone who has a need involving the Forest

600 Archaeology Regarding timber sales - I believe sale administrators are in the best position to determine the significance of archaeological resources within a sale area They should have the responsibility for protecting and enhancing archaeological resources while keeping a timber sale viable and cost efficient For this reason. 1 believe all sale administrators should be certified 1 would like to see the CRM program kept as simple as possible and on the district level It has become a tremendously Complex and time consuming program

Actual determinations of significance can only be made by qualified cultural resource professionals This authority is delegated to the Forest Archaeologist to ensure full consideration of cultural resource values as required by law and Forest Service policy. Timber sale administrators do work with the CRM program They are certified. receive training relating to CRM, and play an important part in protecting these resources The Forest Archaeologist works with these people. and. as with all our programs. efficiency to reduce costs is a consideration

(130)

700 Cultural Resources - Black Mountain has significant cultural importance to members of the Tule River Indian Reservation The Tule River Tribal Council should be consulted if any land management activities are planned in the Black Mountain area on the Tule River Ranger District.	We appreciate the importance of cultural resources to the members of the Tule River Indian Reservation The Forest is committed to the preservation and management of all cultural resources prior to project initiation If Cultural resources are found, they are recorded and appropriate protective measures are devised in consultation With the State Historic Preservation Officer This step would involve communication with concerned Native Americans. as appropriate One way far the Tribal Indian Council to keep abreast with activities on the National Forest is to receive a copy of the Forest Quarterly Planning Schedule This is available upon request

ENERGY, GENERAL (140)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The Plan does not contain positive guidelines for facilitating the production and transmission of electric energy Prescriptions fail to discuss hydroelectric opportunities in any detail The process must contain a comprehensive analysis and evaluation of energy production opportunities	The development of hydroelectric power ha$ historically been done by private enterprise Where. when and how this is done is beyond the scope of National Forest management Accordingly. we have not gone into detailed analysis, but have noted (see the energy paragraph in Chapter 4, Plan. under Future Condition of the Forest) that hydroelectric projects are expected to increase Leaving the entrepreneurship in private hands, we need to remain receptive to proposals, amenable to mitigation (where MORE needed), and not preclude development through administrative actions that ignore hydroelectric possibilities
101 Zone C does not allow authorized OHV use by utility companies (to maintain their facilities)	Zone C has been eliminated and Zone B contains the provision that incidental access off designated roads and trails will be authorized by permit

LANDS. GENERAL (150)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 " individual landowners rights (should be protected in any new use or wilderness designation "	Public input is now regularly sought on such decisions Additionally. the individual should contact his Congressional representative and provide input
101 " all inholdings should be acquired.. ."	Many inholdings on the Sequoia were subdivided many years ago and are fully developed Some contain small communities. Others are not available from the landowner We will continue to pursue those opportunities to acquire inholdings as they become available. are needed, and as Program limitations allow.

102 When the USPS places wilderness at the feet of developed communities, the FS adversely affects the people in those communities If citizens affected could be involved, it would avoid 3 inconsistencies· 1) threatening citizens rights and the right to own property, 2) having the FS involved With planning on BLM land, end 3) tying up more of the South Sierras in wilderness because this use Subverts the rights of citizens and property owners of Kennedy Meadows

It is important that the respondent understand that the Forest Service role in wilderness establishment is one of recommending boundaries and that Congress actually establishes Wilderness via legislative action In some instances. Congress chooses boundary locations other than recommended by the agency Such was the ease with the 1984 California Wilderness Act In all Instances, public involvement is an Important part of the process The RARE II effort by the Forest Service (which established PS wilderness recommendations for all National Forest areas) had extensive public involvement Similarly, there was extensive news coverage as Congressional action commenced. and many publics were involved with members of Congress as actual wilderness legislation was developed

The Forest Plan recommends a 12,500-acre addition to the existing Dome Land Wilderness (referred to by the respondent as the Rockhouse Wilderness) This proposed addition is a parcel of BLM land without private land. roads. trails, or other improvements located in terrain that currently receives very little use It does provide a logical addition to existing wilderness. and. in our opinion, would not adversely impact citizens or private property owners Since Kennedy Meadows is located some miles away. we do not perceive a threat to folks there

Throughout the planning process. the suitability for and the consequences of wilderness designation have been a consideration The Preferred Alternative is designed to produce a balanced level of goods and services from Forest land The existing 264.071 acres of wilderness will be Sufficient to supply a complete range of opportunities Therein. no additional NP wilderness is recommended

Regarding why the PS is involved with BLM land -- the BLM and FS. recognizing 1) the responsibility of the BLM to analyze the Rockhouse Study Area for wilderness, 2) its relationship to the adjacent PS Dome Land Wilderness. and 3) the need for efficiency in planning. agreed that the Forest Service would take the lead in this study effort and include it in its Forest Plan evaluation Similarly. it was expeditious for BLM to take the lead on another study (Cypress) Which included a portion of the National Forest This agreement limits responsibilities only to planning and coordination leading to a recommendation. management responsibilities remain with the individual agencies Should any recommended portion of the area be designated

wilderness. we envision that it will be necessary for both agencies to jointly develop management needs and together establish a cost-effective program of greatest benefit to taxpayers.

103 "I would like to see consolidation Of USPS lands. "

We have no technical response to this expression of personal observation

105 Areas where insufficient data exists to determine productivity were included in the land base . Economic suitability calculations were based on inflated productivity estimates

The productivity in the model was selected to facilitate the analysis A more detailed analysis Would have complicated the model to the point it would not function To change the premises of the model at this point now could result in delaying the process indefinitely At the end of the planning decade. the plan will be reviewed and revised as needed

106 If lend uses are not an issue. Why such strong statements to reduce these uses? Table 2-31 (2-207 DEIS) fails to address the consequences of the actions on existing land uses Without this discussion and analysis. there is no basis for impact analaysis in Chapter 4 and p 3-69 of the DEIS

The number and complexity of special-use permits is not of a magnitude to classify this process as an issue. and initial scoping with the public failed to reveal an "issue" That is not to say that an individual use is unimportant to the permittee. but those concerns are dealt With in project level environmental assessments The District Ranger seeks specific input from concerned people when a timber sale or other project is proposed adjacent to a use area Additionally. the statement in the Lands section of the Forest-wide Standards and Guidelines in Chapter 4 of the Plan does not seek to reduce these uses, but to limit the granting of new authorizations The Statement in Chapter 3 of the DEIS is intended to reflect the reduction of new authorizations and to State that uses no longer valid Should be recaptured In that latter respect, uses would be reduced after thorough investigation. but, again, on a case-by-ease basis

107 Do you expect those people who live at Chimney Peak to give up their land and homes?

No The Chimney Peak area is Outside the authority Of the Forest Service and is not addressed in the Plan

108 I see no evidence of a land adjustment program Landline location activity should be speeded UP and the right-of-way program needs strengthening and more positive action

The Lands section in Chapter 4 of the Preferred Alternative contains the philosophy of landownership adjustment. rights-of-way and boundary marking and posting Financing for the first two items has been virtually nonexistent in recent years Accordingly, detailed plans in these areas are not needed at this time. actions are taken on a Case-by-case basis Funding for land line location work has also begun to fall off and this program. funded largely by timber sale activities. will continue to slow down

109 Please keep me informed as to proposals to designate land as wilderness adjacent to my land The South Fork must be designated "recreational" with access to all The ski resort on Sherman Pass is a plus to this area	Your name has been placed on our mailing list. but we have no technical response to your personal observation.
110 Designate corridors for future rights-of-way (Chap. 5 Management Direction. Forest-wide Standards and Guidelines).	Not able to find the referenced items Suffice it to say that the Sequoia is so located that utility corridors are not (and have not been) needed Existing ones are located many miles to the West and east of the Forest in more easily accessible land
111 I support the efforts to move the Scodies to the BLM	It requires Congressional action to transfer public lands from one agency to another Such action. then. is outside the scope of this Plan.

HYDROELECTRIC DEVELOPWENT (151)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Dams are Outweighed by the importance of preserving the natural environment	This statement of opinion is too general for a specific response.
101 Opposition to the construction of Rodgers Crossing Dam was expressed for the following reasons. a) the potential loss of deer wintering habitat, peregrine falcon and golden eagel, b) the river's popularity for Wild trout fishing. the irreparable damage to the fishery. e) a wild river would be lost, d) water sources within the Park must be kept to protect wildlife and men. e) the dam is environmentally and cosmetically unsound. I want to preserve the river's natural beauty, f) wealthy developers are proposing another dam on the Kings. g) an area that provides hiking. white-water rafting and Other valuable Outdoor recreation activities as well as a unique environment will be destroyed; h) it is rare to find a wild river accessible by car with good camping Sites, clean for swimming and boating and can be enjoyed by all ages and physical abilities, i) it is an ineffective Site unneeded for flood control, j) it needs increased protection and should receive wild and scenic designation. k) protective measures Should be taken and the fishery upgraded. 1) It would ruin the wilderness of the Kings River. m) power production would be unreliable	Legislation to classify the Kings River under the Wild and Scenic Rivers Act, and to designate a Special Management Area within the river canyon has recently been signed Under provisions of this new legislation. no federal lands may be used for the construction of any dam or diversion within the boundaries of the Special Management Area without Specific authority of the Congress.

103 Water releases from Pine Flat Dam should be controlled so as not to kill all the trout with warm water	The Pine Flat Dam is not on National Forest Service land and, therefore. Control of water releases are not within the Sequoia National Forest's scope of authority.
105 Virtually every stream draining the Sequoia is dammed end its water diverted to bring life to a parched semidesert scrubland. ". .Costs in water quality are high and exceed any. potential benefits "	We have no technical response to this personal observation For the record, there is only one dam inside the Sequoia National Forest boundaries. that being at Hume take on Ten Mile Creek The larger dams the respondent appears to be referring to (i e Pine Flat) are all outside of the National Forest and beyond the scape of this Plan
106 (Kings River) With increased population and the resulting increased demand for quality water-related recreation forecasted. there is a reasonable expectation that Without protection this unique resource will be destroyed by water development	See 101 Above
107 No hydro-power facilities should be built unless no adverse impacts can be proven. or unless all local. cumulative. and compounded impacts are mitigated	Proposals for hydro-power development require an In-depth environmental study to be prepared for the Federal Energy Regulatory Commission In addition. the Forest Service requires extensive public input and performs a review of the environmental study
108 The Plan Should indicate a commitment to require suitable instream flows below any new (FERC) projects	The Forest Service and California Department of Fish and Game review all new hydroelectric Projects and require adequate downstream flows to protect the natural resources (riparian. fisheries. etc) as well as enhance recreational opportunities
109 IS the few dollars the Forest Service Stands to make on grazing and hydroelectric permits Worth the immense harm these practices bring to wildlife?	The Forest Service mission is to provide a mix of activities which allow both use and protection of Forest resources What we strive for is wise use of nature's bounty with minimal impact on the environment
110 A dam on the Kings River is supported for the following reasons a) flood control is necessary, b) it needs to be completed. c) water makes the Valley thrive. d) it is needed for irrigation. e) it California can use the electricity and the benefits outweigh the costs	See Comment 101 Above
111 The Forest Service decision to defer any recommendations for Rogers Crossing Dam Project on the Kings River until the KRCD study is completed is supported for the following reasons. a) it makes sense to store water above the immediate needs. water supply is vital to the economy: water storage will help us achieve a better water supply: development of water storage is essential to the survival of the San Joaquin Valley. b) with the overdraft	See Comment 101 Above

of ground water. it is important to develop new facilities, the South San Joaquin Valley is faced with a serious groundwater Overdraft problem that is going to get a lot worse, releases from reservoirs are more Cost effective than ground water for irrigation; c) we need to develop all reasonable sources of water supplies. each river in the Sierra is going to have to develop additional water storage facilities; d) we need conservation as well as alternative water supplies. e) agriculture is dependent on future decisions being correctly made by those empowered to do so, f) we need more energy. g) a decision before a study would be inappropriate.

112 Hydroelectric projects Should be prohibited from all tributaries, streams, and forks of the Tuolumne River; any river or stream feeding into the Tuolumne River, and the North Forks of the Stanislaus and Mokelumne Rivers

The Tuolumne, Stanislaus, and Mokelumne Rivers are not located in the Sequoia NF and, therefore, are not within the scope of this Plan

120 Opposition is expressed toward the installation of an Uneconomical hydroelectric plant that would dewater the South Fork of the Kern River for two miles and create a nuisance of noise and environmental degradation of the Forest and the Dome Land Wilderness It Would dewater the South Fork through our property and the Kern River Wildlife Sanctuary, including the hamlet of Tubatulabel Indians located on the Sanctuary

The hydroelectric project in question is currently under consideration by the Federal Energy Regulatory Commission (FERC) Following environmental studies, they will issue the license to construct the plant if their findings are favorable If the project is constructed, environmental factors will be considered Minimum flows will be maintained for fish and wildlife needs

121 The Hobo project intends to dam up the Kern River This would not be fair to all those folks Who Want to enjoy the river for recreation damming the river will devastate this beautiful run. If this project goes through. the people Of Calif will lose another beautiful whitewater river, the only such river in close proximity to the Los Angeles Basin

To date. an Application for License for a Lower Kern River dam project has not been Submitted to the Federal Energy Regulatory Commission (FERC) A preliminary Permit had been Issued, however. it will expire in December of 1987 This permit does not authorize project Construction, nor does it commit FERC to the issuance of a license

If an Application for License is Submitted to FERC. they will publish. in the Federal Register. and in local newspapers, a Notice describing the project and requesting comments from agencies and the public The Forest Service will be actively involved in providing input since the proposed location is on NF lands

OTHER SPECIAL USES (153)

---PUBLIC COMMENT *(QUOTATION/PARAPHRASE)*---	---*FOREST* SERVICE RESOLUTION---
100 Make some land available to present holders of (special use) permits (for recreaton residences) that (now) have buildings	The main focus of landownership activities in the Forest Service is to consolidate public lands in the backcountry and private lands around urbanizing areas Creation of 'new' inholdings completely surrounded by public land is not considered to be in the public interest.
101 I wish to see commercial businesses reduced and limited	Commercial enterprises on public land are authorized by permit only and are perceived by the Forest Service as providing far a Specific public need Limitations and reductions can be considered if the need for the enterprise becomes lessened
102 Can the Forest Service provide funds and/or influence to facilitate the improvement of this road (Nine Mile Canyon) by Inyo County?	This road is part of the 'Forest Highway System' and is scheduled for reconstruction in FY 88 Funds will be provided and the work done by the Federal Highway Administration
103 The partnership between the Forest Service and the private sector should be encouraged	We have long held the viewpoint that much of the recreation on National Forests can be provided by the private sector We see no reason to deviate from that stance
104 The frequent references to beneficial exploitation by local business and governments reflects an apparent intent to patronize those who support a consumption-oriented plan	We have no technical response for this personal Opinion The Plan is prepared to respond to the various Federal laws governing the actions of the Forest Service It is designed to serve all the people and care for the land
105 We feel that a clear statement needs to be made as to the fate of existing special use permits. VIS page 3-69 of DEIS Which says that an emphasis will be placed upon reducing commitments of public land for non-public land uses	Concerning *non-recreational* special *uses* in the Lands Section of Chapter 3, the statement of the DEIS intends to convey the (1) new uses will be carefully screened for validity before public land is committed to its use and (2) that existing uses, no longer considered valid. Should be phased out and the use of the land recaptured In practice. most of the existing uses Still retain validity. however. for those that do not. the option to terminate must be preserved This has been our practice in the past. no major change is contemplated
106 Stock outfitters and groups such as Pyles Boys Camp must teach and demonstrate by their actions the proper way to dispose of human waste and to treat other campers Perhaps a little education of the staff would solve several problems at once	We have no technical response to this worthwhile suggestion However, the Sequoia NY is initiating efforts to address these problems

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 I think the Valley View and Claraville areas "possess the potential to affect the management of adjacent public lands" and therefore. should be included as an Urban Interface area	This is probably true for some future decade but not for the next 10-year planning period This Plan will be updated periodically or revised baaed on future events Should either area become more intensively developed. a revision to the Plan Would be apropos.
101 Some forest land Should be made available to private ownership when the land is better maintained by the private owner	Although the question of when 'land is better maintained by the private owner' is arguable. the basic philosophy of Consolidation remains the bulwark of our land ownership adjustment policy Where opportunities to consolidate become actionable. certain National Forest System lands could be exchanged to the private Sector
102 Your assessment of foothill community cohesion indicates that. other than speculators, Old and new agree upon preservation of environmental and social values. yet your interpretation erroneously emphasizes divergence I completely disagree With the statement that firewood is the most important factor in Forest living for retirees	The existing wording did not intend to emphasize divergence. but we have reworded the section to read as follows "Some of the values of newcomers, A few newcomers are little more than " Note that newcomers are separated into speculators and Urban refugees. with the latter group more closely aligned with the old timers Therefore. the few speculators are the ones meant to be the people with divergent concepts The first sentence of the next paragraph is also revised to reflect the general agreement but discussing the minority divergents, thusly "The minority of speculators have strained the old "
103 The urban interface should be more specific as to key problems and their solution under the Plan. Also. what powers do you possess to prevent adverse damage to forest resources from mining activities	We have added more specific discussions of the problems associated with the urban interface to help clarify the misunderstanding As to the mining question. there are several safeguards to minimize adverse environmental effects Primarily. a claimant needs to file a Notice of Intent to Operate with the District Ranger In this Notice. the Claimant outlines the major activities that are planned If they are potentially damaging to the environment, the District Ranger requests an Operating Plan, which then details the scope, type and intensity of the planned work Mitigation measures will be agreed upon and a bond posted before the Plan is approved or work begins. Thereafter. the activity is monitored for compliance and shut down if not within agreed upon parameters After the mineral is removed, the Site is rehabilitated to minimize future environmental degradation The miners have a right to develop the mineral resource of the nation and they have agreed to work with the Federal Regulations

LAW ENFORCEMENT. GENERAL (165)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Recommends that target shooting be allowed only in specified areas and that it be carefully controlled	Current regulations prohibit shooting from roads and near places of habitation Plans are to monitor the activity and add additional restrictions if public Safety is compromised or serious conflicts develop
200 An increase in the level of law enforcement is desired to control OHV use	An increased public education effort combined with additional law enforcement training for Forest Service employees will be needed to deal with many types of law and regulation violations

MINERALS & MINING. GENERAL (170)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Wild and Scenic designation (along the Kern River Fault) Would prohibit future mining claims " . stating that there will be no mining expansion in the next ten years is nebulous and not so''"	Wild and Scenic River designations do withdraw an area from location under the mining laws This strip of river was Included in recently enacted Kern River Wild and Scenic River legislation
101 The Conservation Alternative proposes that the Statement on P 4-4 ("encourage exploration and development of mineral resources'.) be changed to read "The Forest Service will allow areas to be Studied " Also. specific sites -- should be studied to determine whether (1) adequate mineral resources exist --- to yield an economically viable operation. (2) each site is environmentally sensitive and (3) unique scenic. wildlife, roadless and recreational qualities would be lost to mining	These proposals are not legal and we cannot effect them The Federal agencies do not "allow" mining The Mining Law of 1872 gives the right to prospect and mine on public lends Also. we do not "study" the areas. a mining proposal is developed by the industry They consider the economics end the Forest Service works with them to make the operation as environmentally benign as possible and mitigating whatever cannot be
102 The National Forest should not be in the business of promoting its resources...or encouraging mineral activity.	We have no technical response to this personal opinion However. National Forests do not "promote" mining The Mining Law of 1872 gives citizens the right to prospect and mine on public lands
103 Standards of mining that assure protection of ground and surface water. recreation. and other values need to be included in the DEIS	These standards are included in the approved Operating Plan for each mining Operation The point is well taken and is done on a case-by-ease basis
104 One of the largest potential tungsten producing areas in our state was eliminated by the California Wilderness Act of 1984. Many of these natural resources are threatened by wilderness designations . We are now importing a large percentage of minerals and metals from foreign countries . This is one reason defense budgets are so enormously high	We have no technical response to this personal opinion

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Livestock grazing should be maintained at current levels based on the benefits received from the program and present economic conditions don't warrent increased dollar expenditures Benefits m-clude products produced. employment. grazing fees, possessory interest tax. fire hazard reduction. range improvements that also benefit wildlife and have responsible individuals on the land to detect law enforcement problems.	The Forest Service recognizes the full range of benefits received from proper livestock management The Preferred Alternative for the Final Land Management Plan maintains existing 1986 livestock numbers With local adjustments being made based on fluctuations in feed conditions Management emphasis is based on ecological principles aimed at reducing conflicts with other resources and uses Conflicts will be addressed on a ease-by-case basis using applicable research as it becomes available Range improvements will continue where cost-effective to reverse deteriorating range condition, maintain livestock numbers and adedquately distribute livestock Changes, if needed. will be addressed in the updating of allotment plans
200 Grazing should be decreased because livestock and improvements destroy visual quality	Visual quality in the National Porest System is measured by natural variety in the landscape and is described in terms of the visual elements (form. line. color. texture) Activities which reduce visual quality are those which introduce unnatural or contrasting elements Although there are exceptions, grazing is generally a low impact activity that rarely disrupts the visual elements to any lasting degree Grazing can. and does. occur in some of the most scenic areas on the Forest - the mountain meadows Meadows naturally appear brown in late summer and fall as plants reach maturity Grazing reduce. the height of meadow vegetation during this period However. this is restored to a more natural appearing state by the following spring
210 Grazing should be reduced or not increased because of l) adverse environmental impacts (i e , wildlife habitat. native plants. *fisheries*, water quality. erosion and oak regeneration). and 21 beef consumpion is declining	The increases in livestock numbers proposed in the DEIS and Draft Land Management Plan were based on the 1980 RPA Study This study indicated beef consumption was expected to increase throughout the planning period. The President's statement of policy (3/30/81) directed National Forests to meet their proportionate share of Increased demand for range grazing (46% increase by 2030). This increase in demand did not materialize Beef consumption has declined since that time Present information indicates this decline may be leveling off The Preferred Alternative for the Final Land Management Plan holds livestock numbers constant with the 1987 levels for the first decade (66,000 AUM's of term grazing permits plus 4.000 AUM's for recreation stock and temporary grazing permits based on favorable forage conditions] Local adjustments Will be made

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based on fluctuations in forage conditons. Management emphasis will be based on ecological principles aimed at reducing conflicts with other resources and uses. Conflicts Will be addressed on a case-by-case basis using applicable research as it becomes available. Any increases identified through the remainder of the planning period will be based on the cost-effective treatment of the chaparral ecosystem. These increases will be reevaluated in future updates of this Plan.

220 Grazing should be reduced or not increased because the Forest Service is not recovering costs

Grazing fees and annual Forest service budgets are determined by Congress and are outside the authority of this Plan The grazing fees from 1966 through 1985 were based on a formula based on the cost of livestock production and red meat prices In 1986 the Administration held grazing fees at 1985 levels

230 Grazing should be decreased or eliminated in Wilderness areas because it destroys wilderness values and is not compatible with human use

Livestock grazing in wilderness is authorized Under the Wilderness Act Of September 3, 1964. Elimination of grazing from wilderness is outside the authority of the Forest Service end this Plan Livestock management can, however. be modified in areas of identified conflict

240 Grazing should be reduced. controlled or not increased in mountain meadows to reduce impacts on other resources.

Riparian areas and meadows are managed under multiple-use and sustained yield principles with emphasis on maintaining and improving meadow ecosystems and water quality Grazing is allowed where the meadow ecosystem or water quality will not be significantly affected The Preferred Alternative for the Final Land Management Plan does not identify any increases in livestock numbers for mountain meadows Conflict between grazing and other resources will be addressed in Allotment Management Plans and resolved on a ease-by-case basis The Forest is presently preparing meadow management standards and guidelines Grazing. as well as other activities. will be evaluated end monitored As additional Peed is produced on transitory range and livestock are distributed to utilize this feed. use on meadows is expected to decline

250 Grazing should be decreased because of Conflicts with recreation uses and/or recreation economy

Areas where recreation is the management emphasis. livestock management will be modified where in direct conflict with those recreational uses Livestock numbers Forest-wide will be held at 1986 levels Local adjustment will occur based on eonflicts and feed conditions

260 Grazing should be reduced or not increased because mulch requirement is inadequate to provide for wildlife needs

Mulch requirements are based on 30 years of research from the San Joaquin Forest and Range Experiment Station. This is a Regional standard. Low mulch

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levels tend to favor forbs the following year High mulch levels tend to favor grasses. The optimum from both the wildlife and livestock standpoint is to have a spatial nix of these successional stages. The 400 pound level is a minimum acceptable level and, for the most Part, will not be reached except in isolated cases

270 Grazing should be reduced or not increased because livestock are not monitored and/or control is inadequate

The monitoring section of the Plan has been changed to reflect the grazing monitoring that occurs Allowable use factors are set based on applicable research and condition of range Changes in condition are noted and livestock use is adjusted accordingly. Annual utilization inspections determine if allowable use is reached or exceeded In areas where lack of livestock control is a problem. conflicts will be addressed in the allotment management plan

271 How can decision be made to increase livestock grazing if range condition has not been analyzed

Range condition is determined through range analysis which is part of the allotment management plans (AMP's) AMP's are tiered to the Forest Land Management Plan

280 Grazing Should be decreased because it promotes desertification

The primary cause of desertification is lack of precipitation to adequately sustain plant life Grazing becomes a factor when there is an absence of this precipitation This is not the case an the Sequoia National Forest

290 Grazing Should be reduced or not increased No Reason Given

Since your comment gave no reason why you feel grazing should be reduced we can not give a technical response to your expression of opinion

300 We oppose the plan's recreation oriented approach shown by the expanded "developed recreation'. areas and the priority of recreation over grazing when there is a conflict between the two The large areas set aside for "developed recreation' conflict with grazing and do not benefit the public or promote stability on the Forest Cattle grazing is compatible with and beneficial to many of the Other uses of the Forest We pay our fair share in fees. land management and improvemsnt, therefore grazing needs to be considered and accommodated in all areas of the Final Forest Land and Resource Management Plan

Thank you for your Comments We have tried to achieve a balance between different user groups in the Forest Plan The mangaement of the National Forest is based upon the Multiple-Use Sustained-Yield Act of 1960 that States in part that the Forest "shall be administered for Outdoor recreation. range. timber. watershed and wildlife and fish purposes " Forest Administrators are, therefore, obligated to the American public to manage the land for these multiple uses

Grazing needs will continue to be recognized

310 What impact will this plan and bill (Wild and Scenic Rivers Bill) have on those which have grazing leases with the Forest Service and the movement of cattle across the area covered by the bill?

The Forest Plan will initiate little change in the grazing of this area The Wild and Scenic River Bill which affects parts of the Kern River is outside the scope of this Plan. but little additional effect on grazing is anticipated

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Facilities and Opportunities should be provided for handicapped users	Elderly and handicapped standards will be considered during rehabilitation. reconstruction and construction of recreation facilities Barrier-free trails
Reststops/restrooms should be provided for handicapped users Wilderness designation makes areas unavailable for handicapped/elderly/very young Don't close off all the 4x4 trails in the high country Remove part of Wilderness at Kennedy Meadows to allow access.	will be developed near some areas (reference Plan Chap 4 under General Developed Recreation Sites) This will include consideration for restrooms and/or reststops Partly in recognition that some Forest users cannot hike and require vehicles to get around, the Forest Plan is not recommending any more wilderness areas within the Sequoia National Forest: and 4x4 trails will remain open where resource protection measures can be assured and where this type of use is lawful wilderness is designated by Federal Law Withdrawal of portions of presently designated wilderness areas requires Congressional action This is not within the scope of this Plan.
200 I am opposed to increases in recreation users fees	We do not have the authority to charge recreation user fees except for campgrounds Which provide certain specific facilities and services (as Specified in the Land and Water Conservation Fund Act [L&WCF]) or reservation fees for instances Where only limited permits are available Campground fee rates are adjusted to come in line with costs, to be commensurate with those fees charged by other agencies. and to reduce public competition with the private sector Any changes in the LhWCF Act or additional user fees would require new Congressional legislation and, ultimately. Presidential approval
300 I am in favor of increasing fees for recreation users, but don't implement a fee system Which has administration and collection costs equal to fees collected. be wary of fee Systems that will Increase "on-compliance with visitor permit Systems. etc , Recreation doesn't pay its way and therefore user fees should be implemented. Incorporate Golden Age/ Golden Access Passport to provide reduced fees for elderly/handicapped, ORV users should pay to use designated ORV areas. Would like to bee entry fee	See #200 above Use of the Golden Age Passport by persons over age 62 and the Golden Access Passport by disabled persons is currently part Of our fee process, providing a 50% discount to passport holders where recreation use (camping) fees are charged
400 Recreation use and development Should be emphasized on Sequoia National Forest. More camping, cabins and trails are proper. more campgrounds Campgrounds should be maintained at high levels (Standard) to avoid deterioration and health and	Recreation development and facility expansion in public use sites will be considered on the Forest These will most likely be where new Water developments occur, where existing water-oriented Sites are being overused and to facilitate wilderness

safety problems Eliminate self service. emphasize developed site management. Recreation is important to local economies

access (see Plan, Chapter 4 under General Developed Recreation). Expansion in the number of recreation residences (cabins) is not scheduled. Management direction is to maintain all developed sites. over time. at a high standard level which will eliminate the self-service operational level (see Plan, Chapter 4 under General Developed Recreation). Our ability to achieve this will be a direct function of our budget Therein, a lower standard of management (and possibly self-service) may be appropriate. particularly during low use periods. We agree With the statement that recreation is important to local economies

500 Timber management should not destroy recreational opportunities and facilities The decision to *retain/expand/create* campgrounds and recreational developments should be based on recreation demand and objectives, not on timber objectives. Present Net Value is greater for developed recreation than for timber management Campgrounds such as Troy & Fish Creek in the commercial Forest Zone Should be shown as CF3 rather than CF7 Trails have been obliterated by roads. clearcuts, and slash, slash Should be cleaned Up and trails re-routed or not displaced by mads.

Recreation demand has played a key role in the decision process for the amount of recreation development provided on the *Forest* (see *EIS*, Chapter 3, Recreation) Facilities to ensure meeting this demand will be continued

Existing recreation facilities within the CP7 Management Area have been reevaluated and placed under the CF3 Management Area in the Preferred Alternative. As Such, they will be treated as inclusions and maintained and rehabilitated compatible With recreational demands and objectives Silvicultural prescriptions will be designed to protect recreational and visual needs. Dispersed recreational opportunities could be enhanced

The Trails section under Recreation of the Forest-wide Standards and Guidelines in Chapter 4 of the Plan directs the Implementation of mitigation measures, including reconstruction/relocation of trails where other management projects eliminate or alter portions Of the long-term Forest trail system This will help to ensure that trails are not lost as a result of other management activities

600 I am opposed to commercial development of recreation facilities and activities by the private sector. *including concessionaire* campgrounds

A part of the overall direction of the Forest Plan (Forest Goals, Chap. 4) is to "encourage investment of private risk capital for development of appropriate facilities and services on National Forest System lands " Recreation service *and* facilities such as outfitter-guiding, resorts. campground concessionaires. etc are *examples of* activities that could be evaluated as to Who (public or private) could provide the best services. depending on existing and anticipated budgets. experience With the activity and the ability to perform over time

	(190) This will require careful evaluation. The private sector has and will continue to play an important role in the overall scheme of recreation on the National Forest.
700 You need to give thought to seeking locations for a very significant increase in the number of traditional. USPS style small, dispersed. recreational sites.	Dispersed recreation is emphasized in the Forest Plan As such, the Forest will be working to help identify and publicize information about recreation opportunities for a wide range of users Camping in undeveloped locations is permitted on the National Forest An increase in use of undeveloped occupancy spots is anticipated.
800 Tahoe N.F publishes a quarterly bulletin which details major projects proposed The Sequoia should	The Sequoia National Forest develops this information on a quarterly basis also, and it is available on request
900 Serious consideration must go into providing "on-motorized. dispersed forms Of recreation on a year-round basis	Emphasis in the Preferred Alternative is on dispersed Opportunities. The entire planning area is open to nonmotorized forms of recreation Wildernesses are open to only nonmechanized form of recreation. Recognizing winter snow precludes use (and access) in many areas. the Plan also provides for Cross-Country skiing. recognizing the need to segregate this use from oversnow vehicles (see Plan. Chapter 4, Nonmotorized Recreation)
1000 We support the Vision Statements concerning recreation (1-1) and suggest an addition "Enhance public knowledge of forest management through visitor information, especially by showing examples of successful management practices	One of the Forest goals is to "provide interpretive end orientation services and instruction with emphasis on resource use and environmental quality'' (Refer to Plan. Chap 4 under Forest Goals) We feel this provides the emphasis requested by the respondent
1100 Increasing the quality and variety of recreation experience will hardly bring about reduction of conflicts between users.	User conflicts should be reduced by increasing the quality and Variety of reerestion experiences within the Recreation Opportunity Spectrum (ROS) framework This ROS framework will aid in the systematic provision of diverse opportunity settings that build to different styles as well as kinds of activities (Refer to Chapter 4 under Recreation Opportunity Spectrum) Further. use of various visitor information techniques to help people know what to expect will also help decrease Conflicts among users
1101 Roads should be held to the minimum necessary for timber management Roads unused for this purpose should be abandoned	Road construction in the Sequoia National Forest is reactive to resource management activities, various intensities of road construction are presented throughout the FElS alternatives depending on the management emphasis Please see Forest Service Roads, #501 for a discussion of abandoned roads and road obliteration

1200 What will be the nature and purpose of the auto tours?	(190) The auto tour mentioned in the Plan. Chap 4 Under Resource Direction refers to self-guided auto tours on established public roads Scenic vistas, Forest Service management activities. historical sites, ete. could be examples of stops along a self-guided auto tour.
1300 1 would like to see a heavy emphasis on wildlife end biological values (interpretation) of the forest along with fishing, camping. hiking. and horse use of the forest rather than the attempt to "brain wash" the public with the "Ahead you will see signs of a working forest" interpretive signs that seem to be designed to diminish public negative reaction to logging	Emphasis will be placed on providing educational and user interpretive services to assist understanding of all resource mangement programs, including timber management. wildlife and biological values. These educational and/or interpretive services will be provided through such actions as outdoor programs. self-guided auto tours. interpretive trails. 3-PIA publications. wildlife habitat project signing. etc (Refer to Plan, Chapter 4 under Office of Information and Interpretive Services)
1400 Public Issues and Management Concerns, Chapter 2. Recreation - Where recreational conflicts exist, they should be resolved in favor of minimizing the impact to natural wildlife and visual resources	Where there are conflicts between opposing recreation values or recreation and other resource values (wildlife. timber, etc), resolution will depend on the management prescriptions for the area, the VQO involved. and the area's ROS objective. Unique values. such as a threatened and endangered wildlife species. will also enter into the resolution.
1500 Management Direction. Chapter 4, Goals Recreation - Add the following goal Ensure that any new recreational Opportunity does not reduce visual. natural wildlife. or wilderness values.	The Plan includes a goal to "Emphasize and facilitate opportunities for recreation in a natural setting" (see Chapter 4) The intent is to minimize impacts on the recreation opportunity by other resources and resource values through the ROS framework
1600 Delete the following goal Encourage investment of private risk capital for development Of appropriate facilities and services on National Forest System Lands Comment this is a National Forest. not a private reserve for venture capital, private investors are not interested in preserving wildlife or enhancing visual quality Their prime motivation is to make money. which is not an appropriate goal for a NF	The goal to encourage investment of private risk capital for development of facilities and services on NP System land is appropriate This is a good way to provide necessary facilities and services for the public when NF budgets are limited or when NF expertise for a particular service is limited (e g , resort developments) The protection of other resources involved in the development and/or operation of these facilities and/or services is handled through the NF special-use permit process
1700 The Plan does not include a Recreation Management Plan for the Hume Lake Basin We feel that a Recreation Management Plan for Hume Lake must be a part of any overall Forest Plan adopted There is likewise no boating management plan or permit system for the Kings River in the Plan. We feel that such conflicts create serious problem or have adverse environmental impacts on the Forest before estab-	The Land Management Plan gives broad management direction or sideboards to subsidiary plans yet to be developed Adopting several individual plans without any philosophical bondage will fragment administrative goals in a more comprehensive plan Plans for Hume Lake Basin and floating on the Kings River. along with several other plans. are called for by the Forest Plan (see Appendix A of the Plan)

lishing an appropriate philosophy of management is to jeopardize the future of the Forest's unique resources

1800 Interpretive Services I would like to see increased emphasis placed on this program. This includes emphasis on campfire programs. bulletin boards, one-page handouts. also direction tours for auto. cross-country skiers. hikers, etc These signs must be easily understood without unnecessary wording and convey our message in a competent. professional manner

The Forest Plan provides for a moderate level of emphasis on Interpretive Services, which includes such activities as campfire programs. self-guided auto tours. interpretive signing, etc Subject to budget allowances. all of our programs and activities will be implemented in a competent, professional manner

1900 Legislation needs to be enacted which returns user fees back to the districts

We agree. however. securing legislative action which returns fees to the Districts where fees were collected requires Congressional action and is not within the scope of this Plan Also see 200 above

2000 Management emphasis (and related funding) needs to be directed to those recreation facilities which are located in areas of concentrated recreation use, i e , Kern Canyon. Hume Lake, etc We need to make a maximum effort to get people out of these heavily used Sites and get them directed to Other less intensively utilized recreation areas, such as the Boole Tree. Chicago Stump. etc

Management emphasis is to manage existing sites to facilitate dispersed recreation. to encourage use during weekdays. and to extend the season oF use In dispersed areas, emphasis will be to encourage this use

2100 The Draft Plan States that recreation Sites Would be developed during the first and second decades only when new water developments and/or licensing actions occur or when wilderness access could be improved We interpret this to mean that new sites will only be developed with funds provided by project proponents Will the requirement to build new facilities extend beyond project-related recreation?

Development of new recreation sites associated with water developments and/or licensing action could be funded by the project proponent or by the government or by both New facilities to improve wilderness access most likely Would not be project-related. and would, therefore, be funded via normal appropriation of funds

2200 How will needs for new facilities be met when such needs are not associated with new water developments -- transferring your responsibilities for recreation development onto the private sector?

Demands for developed recreation facilities on the Forest can be satisfied with existing facilities until shortly after the year 2000 (see EIS. Chapter 3, Recreation) However. some sites (particularly those with a water orientation) may reach capacity within the next few years To help deal with this situation, the Porest will be using information media to encourage People to do such things as frequent more lightly Used Sites and/or recreate during midweek periods Operating seasons of some sites will be extended to facilitate people during early and late season periods The Forest will face a challenge to meet demands at water-oriented sites as the planning period continues. but those sites away from water should easily meet demand on all but a few days each year (e.g., major holiday weekends)

2300 We also request that the Plan include a discussion of how the Forest will deal with Overcrowding and resource damage that may result from an inadequate supply of developed recreation facilities

The Plan does not go into this level of detail It is envisioned that the situation described will be a rather localized situation, and application of a Forest-vide "blanket" statement would be rather meaningless. Our approach will be to assess resource impacts on an ongoing basis (see Chapter 5. Monitoring Plan) utilizing those assessments to help identify problem areas and direct solutions. This is an ongoing process now. and a variety of solutions might be utilized. including such things as encouraging users to access other areas. recreate at different times, utilize quotas or other restrictions. and Constructing additional facilities

2400 Finally, the Plan should explain and specify management practices which will be used to increase occupancy through extended seasons and to enhance dispersed recreational opportunities at developed recreational sites

We plan to encourage more use of our developed facilities during weekdays and off-season periods through effective public information programs (Reference EIS, Chap 3 under Developed Recreation Opportunities) The extension of the use season should provide anglers. hunters and other recreationalists who Want to avoid the normal high-use season crowds an opportunity to use recreation sites that would normally be closed. The intent of the statement "enhance dispersed opportunities at developed recreation sites" is to capitalize on helping the public understand what opportunities exist in the area. via Such actions as signing, providing Information and building trails to Outlying areas

2500 The Sequoia is located within easy reach of two major population centers and making its potential for providing prime recreational use of primary consideration with timber and livestock uses secondary

The Forest Plan recognizes its position of serving the needs of large population centers Growth in these areas including the San Joaquin Valley is predieted to dramatically increase This will produce notably bigger demands on all the Forest resources Recognizing the multipe-use mandate of the Forest Service. the Forest Land Management Plan attempts to satisfy these demands through public service. forest conservation, and a balance of Uses

2600 Greater attention Should be given to the problems of Concentrated use of key areas of so-called dispersed recreation and the problems that result These areas need greater attention in the management program

Emphasis is being placed on the management of several developed recreation sites and surrounding dispersed recreation areas, recognizing they are areas of exceptionally heavy recreation use (Kern River. Lower Tule River Canyon. Hume Lake and Lloyd Meadows) (reference Plan Chapter 4 Under Recreation) This Should provide for the attention necessary to protect resources in these areas

(190)

2800 Management of Sequoia National Forest should emphasize preservation. conservation, and non-destructive forms of recreation. The Forest Service's current and past emphasis on timber production directly conflicts with these goals Timber Production should be substantially reduced because the Sequoia National Forest serves large population centers where recreational demands already exceed supply and continue to increase. Demand for timber. however. is decreasing Even now, the Forest Service now has difficulty finding buyers for the timber tracts it has placed for sale at below-cost or break-even prices.	The modeling process described in Appendix B of the PBIS allows all lands to be available for all uses, within constraints imposed by the theme of each alternative The computer model, FORPLAN, then solves for the particular allocation of resource uses that produces the maximum present net value In this process nonfinancial values. such as wilderness experience, are evaluated and chosen to the extent that they contribute more to public benefits than do values with a financial return We feel the Preferred Alternative provides a reasonable balance among the various resources on the Sequoia NP. This is consistent with our multiple-use mandate. The respondent is referred to #502 under Plan Implementation (Subject Code 400) for additional discussion on below-cost sales.
2900 The management theme for semi-primitive non-motorized areas could be greatly affected by the management prescriptions allowed Although we assume there Will be no regulated timber harvesting allowed. Unregulated harvesting could be significant (the Lake Tahoe Basin Management Unit plan. for example. Shows no suitable timber in the entire Unit. but allows for an annual unregulated harvest of 4 4 MMBF in the preferred alternative)	There will be no regulated harvesting in Semi-Primitive Non-Motorized (SPNM) areas. Where SPNM occurs in conifer forest land. the management prescription Will allow harvest on an unregulated bases. recognizing that all criteria for SPNM will be addressed in the site-specific environmental analysis completed before such a project is started.

DEVELOPED RECREATION,GENERAL (191)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 I think the downgrading and/or closing of established campgrounds is a mistake People are going to camp and if facilities for camping. such as toilets, are removed. unsanitary conditions will prevail	Experience has taught us that. in general. there are fewer sanitary problems at sites where we provide no services than at developed sites where we cannot afford to maintain or rehabilitate facilities to conform with minimum health end safety standards Therein, some Sites that cannot economically meet those standards should be withdrawn These are generally very small and remote sites with very minimal facilities
101 I understand other alternatives are available such as Amenity Emphasis, that will allow camp activities end recreation in beauty, wildlife and wilderness to remain, and not disturbed like Tiger Plats has been	The respondent is referring to a small. lightly used site (Tiger Plat) where some substandard developed facilities were removed Several years ago This Site is currently available for use as an undeveloped site Some alternatives specifically mention evaluation of the potential to convert additional small. lightly used and minimally developed sites to undeveloped occupancy sites. Others. including AMN, are silent This was a matter of writing style The reader needs to be aware that as we strive to provide for public needs while being efficient with available funds. this action may be investigated under any alternative.

	(191)
200 The forest personnel are doing a very fine Job at maintaining the campground and the roads	Thank you for your kind statement. This should continue under this Plan
300 How are existing destination sites to be managed cost-effectively by increasing occupancy through extended seasons?	We plan to encourage more public use of our campgrounds during weekdays and normal off-season periods through effective public information programs (reference - PEIS Chap 3 under Developed Recreation Opportunities). The extension of the season provides for early and late users Hopefully. this will aid in reducing the overcrowding of facilities during the normal high use season. This should prove to be cost-effective
400 None of the alternatives provide adequate consideration to protect the interests of Camp Mountain Meadows. We feel that non public providers of outdoor recreation opportunities such as Camp Mountain Meadows and Shirley Meadows Ski Area should be Considered as Developed Recreation/Conifer Management emphasis Short of the development of this new alternative we propose the following specific mitigation, 1) The camp area will be fenced to exclude livestock 2) The camp viewshed will have a VQO Of 'R' Retention 3) Timber harvesting within the SUP area will be limited to Salvage and sanitation cuts only at times when camp is not in session 4) Timber harvesting within the viewshed will allow for development of mixed vegetative species and create multi-layer appearance	Adequate consideration will be given to protect the interests of activities under special-use permit. This will be assessed in site-specific project environmental analyses Adopted Visual Quality Objectives, timber harvest prescriptions, and other project activities and impacts will be studied and, if needed. modified to provide consideration for a specific site (reference Plan. Chapter 4 - Forest wide Standards and Guidelines under General). Input from Permittees will be a key factor during these studies.
500 I support a management plan which would include the following elements 1) Management of visitor use to avoid habitat destruction Permit-program if necessary to prevent damage to sensitive areas	A significant portion of the Forest is to be managed with emphasis on wildlife and dispersed recreation Under these prescriptions. habitat protection is of prime importance (reference - Plan Chap 4 under Management Area Prescriptions).
600 The rationale for managing developed recreation at low standard is not evident in the document This feature of the alternative design appears to have a drastic effect on PNV	The AMN Alternative was modeled with low standard developed management primarily for two reasons The first was in order to correspond with the theme of the alternative--which States that market resources (e g , developed recreation) are produced at economically efficient levels to support nonmarket resources Low standard was deemed more economical based on existing site conditions and the investments necessary to be able to achieve standard levels of management Second. our planning guides indicated we needed to provide a mix of management throughout the alternatives Given the AMN Alternative theme, a decision was made to model it using low standard developed site management

601 P. 2-98 (DEIS) It does not seem appropriate to provide low levels of self-service in the IS program even if there is high level of direct public contact

Our thinking With respect to Interpretative Services is that the high level of direct public contact negated the necessity of a high level of self-service This is a judgement call we feel remains appropriate.

602 I question the viability of such heavy emphasis on road program (in AMN) when it buys so little in recreation use

The AMN Alternative places emphasis on the road program as a means to facilitate recreation opportunities outside of developed areas, that is, disperse people widely around the Forest Since the nature of management envisioned under this alternative is less concentrated. roads are necessary to achieve this end

603 Without displaying current ROS acreages. this Table (on pg 2-204 DEIS) does not provide the reader with a good indication of the effects of the alternative ROS The same applies to VQO displays

We have considered the request to include 1982 (base year) information on the charts included in Chapter 2 of the FEIS to facilitate understanding of effects The purpose of Chapter 2 is to identify the alternatives and the differences between them. and not to deal with effects Chapter 4 of the FEIS discusses environmental consequences in detail and includes displays of both ROS and Visual Quality (including 1982 baseline information) Please refer to this chapter for detailed information on effects

604 Pg 2-243 (DEIS) Are the DISC Benefits of Timber for MMR, VCC. and MLV really those that Should be shown for recreation?

We have reviewed the table referenced. and made necessary corrections in the Final EIS

605 Pg 2-244 (DEIS). It would appear that if standard rather than low standard recreation were applied to AMN. the PNV would have zoomed up to about 775 Then if the road costs were dropped to the level of PRP, the PNV of AMN would have gone to 800 Such changes in that alternative design would have made it superior to PRF'
The MLV PNV and Water (columns in TABLE 2 35) appear to be in error

We concur with the conclusion drawn. If PNV were the only decision variable considered. all alternatives would be modeled at standard levels However. in order to demonstrate effects and provide a range within alternatives. low standard was used in some instances AMN was chosen as one (see comment 600 above)
Regarding the MLV. PNV. and Water values. please see Footnote 5 of Table 2 31 in the FEIS Minimum level values have been subtracted from Costs end benefits Shown for the items listed above in order to show incremental values and costs The intent Of this display is to distinguish benefits and costs resulting from the management program from those attributed to only retaining the land in Federal ownership

606 P 4-39 (DEIS) The apparent reason for the heavy road program in AMN is to provide safe transportation network for recreationists Does this mean that the much reduced road program in PRF will create an unsafe network?

We feel the reader has misinterpreted page 4-39 of the DEIS regarding roads and safety The road network ultimately provided under all alternatives will consider Safety

(191)

607 P B-35e (DEIS) The rationale that developed recreation is produced at low standard levels in order to emphasize dispersed recreation Opportunities is badly flawed	We do not find the detail discussed by the reader on page B-35 of the DEIS. so cannot respond further See responses above for similar discussions Which may be appropriate
700 Recreational values must be considered when prescribing silvicultural Systems For example. in Management Area Prescription CF3, uneven-age management should be considered outside the confines of developed sites, to protect/enhance recreational values This is in keeping with FS policy that the purpose of developed sites such as campgrounds is not just to serve as destinations in themselves but to facilitate public recreation use of the surrounding areas for activities Such as fishing, hunting. hiking. etc	The specific silvicultural prescriptions for these areas will be developed through the site-specific environmental assessment process Recreation values will be covered during this process The use of uneven-aged management, as one tool. has been added to this prescription (see Plan. Chapter 4)
9990 HOW are existing destination sites to be managed cost-effectively by increasing occupancy through extended seasons?	Wording has been changed to clarify the intent of the statement Increased demand will be satisfied by extending seasons rather than developing new sites

DISPERSED RECREATION,GENERAL (192)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 I an opposed to target shooting on SQF Shooting should be prohibited Completely Shooting is dangerous. frightening. caused litter, and results in vandalism and property damage	Target shooting is a legitimate, recreational activity on Forest land Proper management Will reduce conflicts With other uses and resource damage The Preferred Alternative allows target shooting but requires that the use be monitored and managed to reduce conflicts (refer to Forest-wide Standards and Guidelines in the Plan)
200 I am opposed to target Shooting on SQF Shooting should be restricted to small, designated areas, - It is dangerous to people. animals - - Results in littering of shooting areas - - Results in vandalism and property damage -	See 100 above
300 I am in favor of current management of target shooting on SQF	See 100 above
400 I Support increased maintenance of hiking trails - Current maintenance is so low that trails are becoming hazardous -	Trail maintenance will be emphasized with attention to the more popular end higher used trails and at levels to minimize trail degradation While some increases are planned in the trail system, it will be necessary to insure maintenance dollars are not spread too thin It is planned to rehabilitate or reconstruct 50% of the trail mileage with the first decade (reference Plan. Chapter 4 Under Trails) (Also. see the trails portion of this response section)

(192)

500 Nan-motorized recreation such as hiking. back-packing. and X/C sking Should be emphasized.	Emphasis in the Preperred Alternative is on dispersed opportunities The entire planning area is open to nonmotorized forms of recreation except wildernesses, Which are not open to mountain bikes. but are open to other nonmotorized forms of recreation. Recognizing winter snow precludes use (and access) in many areas, the Plan also provides for cross-country skiing. recognizing the need to segregate this *use* from *oversnow* vehicles (see Plan. Chapter 4 Under Nonmotorized Recreation)
600 Motorized recreation and developed recreation should be emphasized Preservation is detrimental to the forest.	Motorized recreation and developed recreation are being emphasized in some areas consistent with the ROS system of planning Primarily. emphasis will be in the Rural and Roaded Natural areas and to a lesser degree in the Semi-Primitive Motorized area (reference Plan. Chapter 3 Under Recreation) It is important to note that the Plan includes a broad spectrum of recreation. ranging Prom primitive to highly developed
700 Equestrian use should receive more emphasis Camping sites should be designed to accommodate horse use	This emphasis Is within the *scope* of the Preferred Alternative We are planning to take a comprehensive look and identify the needs of equestrian uses of our Forest trails *We* are emphasizing the improvement and development of equestiran trailhead facilities for wilderness uses Public pastures will be established and maintained for both dispersed and wilderness overnight camping opportunities (reference Plan. Chapter 4 under Recreation. Trails - Wilderness)
800 Hunting and fishing should be encouraged	Hunting and fishing are being encouraged through the Forest's Plan which places emphasis on *dispersed* recreation activities Emphasis is also being placed on maintaining high quality wildlife and fisheries habitat (reference Plan. Chapter 4 under Dispersed Recreation Management and Fish and Wildlife)
900 I am opposed to hunting	It is the Forest Service's responsibility to manage the habitat for wildlife to maintain adequate population and distribution The State is charged with the responsibility of managing the wildlife species including hunting quotas Both agencies work together in the area of wildlife (and fisheries) management. and. generally. the Forest Service supports the wise utilization of wildlife *via* hunting (reference Plan. Chapter 4 under Wildlife and Fish)

1000 Equestrian use should be prohibited where rutting or other resource damage will occur.	System trails Will be managed and maintained to minimize trail degradation (refer to Plan. Chapter 4 under Trails) If an unacceptable resource problem occurs, the Forest Supervisor has the authority to restrict or close an area to a specific use Hopefully. other mitigative measures will solve the problem
1300 Roads should not be built or maintained for recreations1 purposes	Recreation is a viable and legitimate activity on NF lands A Wide diversity of recreational opportunities are provided by the Preferred Alternative Since virtually all activities are dependent to some extent on road access, it is essential that loads be built and maintained for recreational purposes where appropriate
1500 Water oriented use A switch to day-use emphasis should occur on the Lower Kern only from Democrat Beach to the mouth of the Kern Canyon. rather than on the whole length of the Lower Kern as proposed Whitewater boating activities require overnight use above Democrat Beach. and other users should also be able to camp in this upper stretch of the Lower Kern	The day-use emphasis in the Lower Canyon will not preclude overnight camping when this activity is authorized by permit Similarly. some overnight camping facilities are envisioned in the Canyon However, a move away from the amount of camping Currently occurring (particularly in the lower part of the Canyon) will be necessary to meet future demands for space within resource constraints
1600 The Forest must utilize areas already Opened up by logging roads for motorized camping instead of creating e situation where everyone parks at the ends of roads at the gateway to the wilderness areas There are many prime camping areas that could be "developed" in a low-key way to encourage dispersed camping	The Forest Plan places emphasis on developing or improving wilderness trailhead facilities (refer to Plan, Chapter 4, under Developed Recreation Sites and Wilderness) While access into some areas opened for logging will be Closed following logging. there will be many miles of roads open for use Camping is permissible in any suitable location These sites will not be developed. rather. campers can utilize them in a fashion that meets their needs
1700 Additional camp sites at Trout Meadow Should be established. Also. it seems to me that Willow Meadow has a couple of areas that could be designated as areas for camping during Stage I alerts	The Forest Restricted Use and Fire Closure Plan (revised in 1987) permits temporary fire-safe areas Which may be made available at the discretion of the District Ranger pending need. location. and the severity of the existing fire danger Before going camping during fire season. individuals are encouraged to check with the Forest office in the vicinity for specifics regarding camping in undeveloped areas There are no plans at this time to expand camping Sites at Trout Meadow since this area is within the Golden Trout Wilderness
1800 Areas such as Trout Meadow. Gray Meadow. etc , Should have at least one area set aside for grazing of private livestock It is wrong to force the public to impose on leasee's facilities. or to put their livestock out to eat meager bits of bunch	The Preferred Alternative has been modified to include the establishment of a public pasture System to enhance overnight use by equestrian users Specific pasture locations and development will be covered in separate site-specific environmental

grass in the forest when most of the time the feed is waist high in the fenced off meadows	assessments
1900 Minimize the number of new roads. Confine road work to maintaining existing. necessary *roads* Curtailing road-building for logging certainly is in line With this suggestion	The Forest Service has a legal obligation to provide a balance of natural resources - water. soil. forage. wildlife. recreation. and wood In all of the alterntives presented in the FEIS. some degree of roading is necessary to fulfill this Obligation Maintenance of existing roads is also part of each alternative

ORV USE (193)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
101 Respondent supports the multiple *use* concept on public lands	The Forest agrees with the multiple-use concept and the Plan is developed under this principle
102 Respondent supports the PRF Alternative Plan for the Sequoia with the CORVA restrictions	We have no technical response to this expression of opinion The Preferred Alternative in the Plan has been modified considerably and Should be consulted for details (Chapter 4)
103 Trail rerouting in RNA areas must be allowed	Trails will be relocated out of RNA's if conflicts develop RNA's are established. as the name implies. primarily for research and educational purposes As such. recreation use will not be encouraged
104 All trails should be Open to OHV use (including motorcycles)	The Preferred Alternative limits OHV use to designated roads and trails (Forest Plan Chapter 4) While many trails will be open to OHV use. there are also trails where OHV use is inappropriate because of resource and/or user conflicts These trails will be closed to OHV use The actual decisions on which roads and trails will be available for OHV use will be made during development of the comprehensive Forest Trail Plan (see Forest-wide Standards & Guidelines) This will be a significant undertaking and will include input from all users
105 Forest user should have access to all other special areas	Forest users have access to virtually all areas of the Forest However. the type of access may vary An exception is Research Natural Areas. where use is not emphasized in favor of gathering scientific information
106 All OHVs should be allowed to use fuelbreaks for travel	OHV use of some fuelbreaks may be appropriate (See 104 above) Planning will help make this determination end those open will be so designated

107 OHV use should continue during Stage II closures on the Kern Plateau.	Stage II fire restrictions are implemented during periods of high fire danger to prevent fire occurrence. OHV use (like several other activities) during such periods is inappropriate since our emphasis is to reduce the potential of destructive wildfire during these critical burning periods Therein. OHV use will continue to be restricted during Stage II closures
108 Two-wheel existing trails should be protected from ATV use by using steel poles in strategic locations to prevent use	This is one possible management technique that may be used under some situations Specific conditions will determine the most appropriate solution.
109 Signing and education are a must	We agree This is an important part of OHV management under the Preferred Alternative
110 Meetings with user groups are a must	We agree Again, this is considered an important part of OHV management under the Preferred Alternative
111 Expand the "Adopt-A-Trail" program coupled With reasonable use of the "Green Sticker" Fund	This can and will be done Within the context of the Preferred Alternative (refer to Chapter 4, Porest-wide Standards and Guidelines)
112 Develop the Greenhorn District (Flutes. etc) and Seodies for trail expansion	See 104 above Comprehensive System planning will provide the specifics of what the Forest trail System will be in time It is not possible to say at this time if additional trails will be developed in either area
113 Hook up trail between Troy Campground and Blackrock Ranger Station -- keep Troy Meadows open	This trail is currently planned and has been approved for construction as part of a previously approved Green Sticker project
114 Allow ATV use on old logging road next to Jackass	Refer to 104 above
115 Construct trails in the conifer zone and pinyon sage with speed control in mind	We agree Speed control is a Critical part of all OHV trail construction and have added it as part of the Preferred Alternative (see Standards and Guidelines for Dispersed Recreation) This will be a Consideration in all OHV trail construction and reconstruction
116 Develop more ORV trails for all types of ORVs including ATVs	The specifies of types and amount of trails to be designated and/or developed will be addressed in a comprehensive Trail System Plan (refer to Standards and Guidelines for Dispersed Recreation) This will be developed under the umbrella of the Forest Plan
117 Build and maintain new loops and connector trails	See 116 above. This is a standard for trail development on the Forest (see Forest-wide Standards and Guidelines)

118 Have dispersed campsites and no logging across ORVAC Trails.	Nothing within the Plan will change the existing policy that allows dispersed camping (camping in undeveloped areas) on the Forest This is a permissible use of Forest land and an important part of the overall recreation opportunity spectrum Logging will continue as one of the multiple uses of the Forest Since trails exist through commercial forest areas, it is reasonable to expect logging may affect the trail system in some instances Where it does. mitigation is required and damage to trails will be corrected (see Trails section of the Standards and Guidelines).
119 Do not close any more wilderness off -- wilderness closures took some of the best loops (Jackass Peak Trail)	New wilderness is not recommended for National Forest System land A small extension to the existing Dome Land Wilderness is recommended in the Plan This would involve lands administered by the BLM The area involved is not currently used by OHV's
120 Place restrictions or regulations on the use of firearms on ORV roads and trails	Certain regulations exist now regarding the use of firearms on roads and near developments in the NP It is illegal to discharge a firearm across or along roads. and within 150 yards of an occupied area with this in mind. target shooting is a legitimate. recreational activity on National Forest System land However. restrictive orders may be imposed if nessary Proper management will reduce conflicts with other uses and resource damage The Preferred Alternative allows target shooting. but requires that the use be monitored and managed to reduce conflicts (refer to Forest-wide Standards and Guidelines in the Plan)
121 Would like to see camping in the "B" Zone	Camping is allowed in the "B" Zone The "B" Zone refers to OHV administration (designated roads and trails only). and includes all of the Forest outside wildernesses As explained under 118 above. camping is permissible in dispersed areas as well as developed Sites
122 Do not close Big Meadows area to trail biking	Refer to 116 above Since Big Meadow is not within an emphasis area. OHV use will not be encouraged there
123 Would like to see new ORV trails from Stony Meadow to Rattlesnake Canyon (connect 33E22 to 33E24)	Refer to 116 above

124 Sirretta ORV trail Should remain	The management emphasis for the Sirretta Area has been revised from what was proposed in the Draft. Under the Final Plan. the Sirretta Area will be managed under a SPNM (Semi-Primitive Non-Motorized) category As such. OHV's will not be permitted in this area. The trail will be closed to their use This decision was made recognizing the fragile soils in the area. in Order to improve compatability with the adjacent Dome Land Wilderness and in recognition Of the Twisselmann Botanical Area Which will be be established
125 Revise OHV plan	With the changes proposed in OHV management under the Preferred Alternative. it will be necessary to revise the OHV Plan. This is called for (see Plan, Chapter 5).
126 Proposed increase in OHV opportunities is inadequate to meet projected demand	We appreciate your comment Our projections indicate that demand can be met through the planning period (refer to the Recreation Section in the FEIS. Chapter 3). Additionally. there will be comprehensive trail System planning effort for the Sequoia NF (see Plan. Chapter 4) This will include consideration for all trail uses Demand will be a factor considered during this planning process
127 Continue/expand volunteer trail maintenance/ construction	We agree See Forest goals in Rural Community and Human Resources section
128 Forest needs an OHV map with information Such as type of trail. time and mileage, safety information, travel tips as well as information about seasonal closures, and a number to call for information about trails	We agree A key aspect of OHV management under the Preferred Alternative is sharing information with users Much of this detailed information will be developed during preparation of the Trail Plan (see Forest-wide Standards and Guidelines) Currently. information for parts of the Forest is being developed Hopefully. it will be available soon
200 I believe OHV use should be substantially reduced and limited to small designated routes (no "C" zones)	The Preferred Alternative limits OHV use to designated roads and trails on the entire Forest outside designated wildernesses (which are closed to all motorized/mechanized vehicles) (see Plan, Chapter 4) Open areas will not remain on the Forest
201 OHV use disrupts wildlife cycles, destroys vegetation and erodes forest land. provides an ever present fire hazard. increases law enforcement costs. increases accident rate both to riders and hikers, creates litter and vandalism. and has a negative affect on the visual aesthetics of the forest	While these impacts may happen if OHV use is unmanaged, the Preferred Alternative requires management of OHV use to minimize these problems (refer to Chapter 4, Standards & Guidelines) We are confident that OHV use can be managed in an acceptable manner on the Forest

202 We can expect the landscape crisscrossed with ORV trails, streams churned into quagmires, seedlings and Saplings crushed under tires. more litter. policing problems beyond the control of rangers. With less and less money to spend, the F S seems to be over-extending itself in opening up these areas to OHVs ORVs are Sport-toys for people who have no destination	To reduce these problems. the Preferred Alternative will limit use to designated roads and trails as well as address the administration of this activity Again. we are confident that OHV use can be managed in an acceptable manner on this Forest
203 For hikers. horsemen. campers. backpackers, fishermen. and other outdoor recreationists it is miserable to have all dust and noise I am worried about air quality	Comprehensive trail System planning will result in identification of trails for all users Some trails will not be available to OHV's An important aspect of the Preferred Alternative will be Information dissemination. that is, helping users know what to expect in areas of the Forest That way. they can better plan their outings to achieve their expectations Air quality is not a perceived problem with OHV use
204 An increase of 15% ORV use can only have detrimental effects on the Sequoia National Forest	Application of Forest-wide Standards & Guidelines and Sound administration will minimize impacts from Increased use
205 Increased routes for ORV's are contrary to the conservatory nature of the intent of preserved open spaces and personal needs of Solitude & quiet in the NF's	Refer to 201 and 202 above Also. funding will be necessary to deal with OHV'S on the Forest Needs may include additional trails Currently. a significant Part of the Forest's OHV trail work is done by volunteer users and/or financed by OHV users via the State "Green Sticker" fund This situation will continue. with Specifics identified via the comprehensive trail planning effort identified in the Preferred Alternative
1 I Suggest ORV be restricted to less fractual areas of the national forest. or already established areas Money should not be spent to build more OHV trails	
206 Every year we lose more and more public land for OHV use I hope this doesn't continue It excludes the traditional users of the Forest One road can ruin an entire valley Government Should protect the Forest for the majority of the public	Refer to 104 and 202 above OHV's are a legitimate use of the National Forest We are confident that this use can be managed in an acceptable manner on the Forest
207 Oppose allowing cross-country vehicles (OHVs) use on 60% of the forest plus another 10% on designated trails.	Refer to 104 and 202 above
208 Most of these people care nothing for our *wildlife*	We have no technical response to this statement of *opinion*
209 Such uses destroy native vegetation. damages Water Shed and Water quality. creates soil compaction. and disrupts wildlife cycles It frightens the animals. including cattle	Refer to 201 and 202 above

210 The proposed plan for SQP would allow ORV activity in most. if not all areas except Domelands (sic) and Golden Trout Wilderness Areas I object Such a course will lead to the destruction of the forest.	Refer to 104 and 200 above
211 No ORV on Piute Mountains. Kern Plateau or Scodies	The Preferred Alternative has greatly changed from the proposals presented in the Draft Plan and Should be consulted for specifics OHV's will be allowed on designated roads and trail6 (outside wilderness) Forest-wide This Will include the areas mentioned Actual trail specifics will be determined via comprehensive trail planning
212 The Preferred Alternative Plan does not adequately address the protection of sensitive plant and animal species nor does it provide Sufficient funds to monitor the effect of clearcutting, increased grazing. and OHV use on wildlife	Please refer to revisions made to sensitive plant and wildlife portions of the Plan. The Forest Service does not have control of funding levels for specific programs such as monitoring The Stanislaus, Sierra and Sequoia National Forests are working with the Pacific Southwest Experiment Station in developing a low Cost, but reliable monitoring plan for wildlife based on high risk and analysis (refer to Plan, Chaper 5, for monitoring plan specifics).
213 The Environmental Impact Statement falls to analyze the impact of ORV use on wildlife, Water quality. soils. fire hazards. noise pollution. and Don-motorized recreation	The FEIS does not attempt to identify every specific impact -- attempts to do so would result in a much larger (and more confusing) document Instead, the environmental consequences of the various alternatives have been assessed by identifying key indicators for each resource (see Introduction for Chapter 4 of PEIS) These indicators reflect the overall impact on the resource in general Noise and fire hazard are site-specific items and are the types of impacts generally included in project level EA's
214 Peaks Such as Bohna, Sunday. Split, Black #5, Heald, Scodie, Bald Eagle. Sirretta should be protected from ORVs. Also. Lightner, Nicolls, Pinyon, Sorell, Piute Lookout. *Moses.* N Maggie Mts., Taylor Dome	Refer to 104 above
300 I favor OAV use in the Kennedy Meadows Area	National Forest System land areas immediately around Kennedy Meadows, with the exception of a road and trail corridor along the Blackrock - Sherman Pass Road, are within the South Sierra or Dome Land Wildernesses As Such. they are Closed to OHV use Many trails in the Troy Meadows and Fish Creek areas of the NP (approximately 4 miles West of Kennedy Meadows) have been designated for OHV use and Will remain available

	(193) The lands outside the NF near Kennedy Meadows are either public (BLM) or private OHV use on these areas is subject to respective landowner or agency direction
340 The OHV designations are too liberal to adequately protect important forest resources. We do not believe the draft document adequately addresses the negative impacts on wildlife that will result from increased ORV access We believe that Forest access should be limited to existing roads and trails or the "white arrow" system employed on many forests "Off road With minimum resource damage" could be designated in conjunction with fuelwood gathering. or other special use areas The potential risk for resource damage by unknowing or uncaring OHV Forest users is too great to accept The costs of rehabilitating damaged areas could be avoided by stronger protection and enforcement before the damage occurs	The Preferred Alternative has eliminated the open for cross-country "C" Zone contained in the DEJS OHV use will be limited to designated roads and trails (see Plan. Chapter 4 for specifics of OHV use)
400 I urge the SQF to prohibit ORVs on all of the Forest except mads because ORVs cause erosion. destroy watershed. destroy animal habitat. cause obnoxious noise. cause obnoxious dust. create a fire hazard, and result in law enforcement problems and costs Executive Order 11644 requires agencies to allow OHV use only where minimum damage and conflicts will occur Prohibit ORVs on trails Until studies show environmental impact is negligible	OHV use on National forest System land is a legitimate recreational activity The Preferred Alternative will provide areas outside wilderness where OHV use is not emphasized or encouraged, as well as some OHY emphasis areas. that is. areas where we will direct OHV users. In either instance, use will be limited to designated roads and trails. subject to seasonal or permanent restrictions to prevent resource damage. facility damage. and/or user conflicts (refer to Recreation Section Of Chapter 4 of the Forest Plan for specifics) The proposed management will keep impacts and conflicts within acceptable limits
500 1 favor ORV "C" Zone designation for Scodies and Piutes	Opportunities for OHV Use can best be provided through a system of designated roads and trails The designation of an open ("C") zone limits the ability to manage use Based on public comments opposing this open designation. coupled With the potential impacts and anticipated increases in demand. the identification of open ("C") zones is considered inappropriate and the Sequoia NF will be managed Under a designated roads and trails concept (refer to the Recreation Section of Chapter 4 of the Forest Plan for specifics)
600 ORVs should be limited to designated roads and trails only - no "C" zone, only "A" and "B" zones should be designated.	This has been done in the Preferred Alternative Please refer to the Recreation Section of Chapter 4 Of the Forest Plan for specifics

700 ORVs should be allowed to operate only on roads (Level 1, 2, and 3 only), and on trails below 4.000 feet elevation which do not lead to Wilderness.

Refer to 400 above It should be noted that Maintenance Level 1 roads are closed to vehicle use, and OHV's are not permitted Comprehensive trail system planning will include consideration of roads necessary to round out the OHV system If roads presently classified under Level 1 are considered a necessary part of the system, they will be reclassified to Level 2 and managed in an appropriate manner for OHV's

800 I favor "A" ORV Zone designation for West side of Kern Plateau, especially around Horse Meadow Campground

The Preferred Alternative will provide areas where OHV use is emphasized as well as those where OHV use is not emphasized The west side Of the Kern Plateau is an area where OHV use will not be emphasized

The designation of this area as an "A" Zone would preclude any Opportunity to identify an OHV corridor through the area to adjacent areas or to respond to needs identified in the Comprehensive Trail System Plan In those areas where OHV use will generally not be encouraged. use will be directed away from developed sites such as Horse Meadows Please refer to Chapter 4 of the Forest Plan and accompanying maps for more information on emphasis areas

900 ORVs Should be restricted to designated mads and trails only Additional management actions which Should be taken are

1 Prohibit ORV use when sails are wet
2 Require mufflers to reduce noise to same level as normal passenger vehicle
3. Restrict tire type to designs which are least damaging to roads and trails
4 Register ORVs at Ranger Stations to monitor use
5 Set and enforce speed limits for ORVs
6 Close a significant portion of non-wilderness component to ORVs.
7 Restrict some trails (outside Wilderness) to non-motorized use only

ORV use will be limited to designated roads and trails as Suggested

1. The Preferred Alternative allows for seasonal closures to protect facilities when wet (see Recreation Section of Chap 4 of the Porest Plan for specifics)
2 The Forest has been. but will be emphasizing the monitoring of OHV noise to ensure compliance With existing state end federal noise regulations. A standard identifying this management emphasis has been added to the Forest Plan (see Chap. 4 - Recreation) Establishing more stringent regulations for the Forest is not appropriate at this time.
3 Other management techniques such as controlling trail locations and design (which will reduce speed). seasonal closures for wet soils, and user contact/education are usually more effective and require fewer administrative expenditures
4 The concept of a registration or visitor permit may be appropriate if a quota system is anticipated. or if Other forms Of communication With users have been used and Shown not to solve problems There are other methods (such as maps. information, signing and handouts) which have not been used With OHV's that should be utilized before initiating a

(193)
permit System. The Preferred Alternative includes emphasis on these items (see Recreation section of Chap 4 of the Plan)
5 There is no practical way of enforcing a speed limit for OHV's The only way speed can be practically reduced is through trail system designs Which slow travel to acceptable levels A standard pertaining to this factor has been added to the Preferred Alternative (see Plan. Chapter 4 - Recreation Section)
6 Refer to 400 and 800 *above*
7 This has been done in the past, since not all trails have been available to OHV's The practice will continue under the Preferred Alternative Comprehensive trail planning will deal with the specifics of this matter

950 Forest-wide Standards and Guidelines (should say) - No ORV usage shall be permitted within the Forest The present net value does not Justify the potential irreversible wildlife and habitat damage the FS cannot effectively police the continued and destructive abuse that Sequoia has received from past OHV uses Encouraging future OHV use will only compound an already unmanageable problem

OHV'S are a legitimate use of the National Forest We are confident that this use can be managed in an acceptable manner as defined in the Preferred Alternative Standards and Guidelines have been strengthened so that OHV use will be limited to designated roads and trails (Plan, Chapter 4) Further. the Forest will be undertaking a comprehensive trail system planning effort to determine specific uses on trails See Comment 900 above

1000 1 Combining mountain bikes with hikers and equestrian use creates problems Mountain bikes should be limited to vehicle trails

2 Management prescriptions under dispersed recreation indicate OHV trails will be developed in Roaded Natural Areas This Should also include Semi-primitive Motorized Areas

3 CF 7 - Dispersed Recreation R2 Does this infer that no new trails will he developed? It could be interpreted this way New trails Should be allowed when needed

4 CP 7 - Dispersed Recreation There is no discussion of OHV use and opportunities

5 CF 7 - Transportation R3 Local roads could also provide recreational Opportunities if they are Part of the OHV system.

1 Mountain bikes are considered to be a wheeled OHV (see Chap 4 of the Plan) As such they will be confined to designated vehicle routes
2 The Plan has been revised to eliminate the reference to Roaded Natural areas
3 Chapter 4 of the Plan has been revised to allow for trail construction when Justified
4 The opportunity to provide OHV recreation in CF7 Zone is allowed See management direction
5. Under the provisions of the Forest Plan. many local roads will be available for OHV's Generally, native surface (local) roads maintained to a Forest Service level 2 standard will be available to OHV users except when closed by Forest Supervisor order to prevent resource damage. improvement damage. and user Conflicts as described under Wheeled Off-Nighway Vehicles (OHV's) in Chapter 4 of the Plan Maintenance level 2 mads Would include most native surfaced mads not barricaded or signed to prevent public use

1100 DEIS, page 3-87, fifth paragraph - This Paragraph "Off-highway vehicle (OHV) use has intensified the recreational pressures On public lands and ha6 resulted in some additional air and noise pollution Noise pollution may disrupt wildlife and can also

We have reviewed this paragraph and feel it is correct as written. It does not make any comparisons or attempt to rate the relative impacts between OHV use and other activities

reduce the esthetic (sic) quality of the environment" contains a false hypothesis, innuendos, and value judgments The truth is that according to a Forest Service paper a human on foot is more disruptive to wildlife than a trailbike, the air or noise pollution due to OHVs is unmeasurable with respect to the entire forest and is mast certainly less than that caused by timber activities, and aesthetic quality is totally in the eye of the beholder such to some OHVs Increases this quality

1201 CORVA strongly supports the Preferred Alternative with the enclosed revisions CORVA and other OHV groups Should be consulted if management practices would have an adverse effect on our access and possible closure of existing or future planned OHV routes We will be willing to help mitigate any problem areas Mitigating may include controlled access to river and creek crossings. rerouting of trails that may be damaging to meadows. rerouting Of trails and routes that may be nesting areas of wildlife, ete.

Consultation With users will be an important part of both comprehensive trail planning and future management on the Forest However. the Ultimate management decisions will remain with the Forest Service. The Porest will be looking toward users/cooperators to help as volunteers when problems are identified Based on past responses, this help will be readily available.

1202 Comments On Dispersed Recreation Management OHV recreationists traditionally look for low level campgrounds Most desire larger pads for their equipment, sanitary facilities. Water. and interpretive services Forest Service should meet with all user groups in the near future to mitigate differences between these camp facilities users Some suggestions include segregation of user groups in popular camp facilities (Troy, Fish, etc) Develop new facilities Adopt educational signs to inform the public of competrng uses and ways to satisfy them all

See 1201 above.
The Preferred Alternative allows for a diversity of camping facilities Consideration for the type of use (e g , self-contained motor homes. OHV's and trailers) is a factor in site design for either construction or reconstruction projects & addresses specific needs at that level of planning There will also be increased emphasis on Information dissemenation and user education under the Preferred Alternative

1203 CORVA sincerely believes that the designation in Zone "B" "Limited Use-Roads and Trails Only" should be revised as follows "Zone B Limited Use All Roads and Trails Open Unless Posted Closed."

The Preferred Alternative limits OHV use to designated routes only (see Chapter 4 of the Plan) Therefore. if a route is not designated (e g , posted as open or shown on maps), it is considered closed to OHV use Our Justification for this position is based on past administrative experience which has shown the way requested to be unmanageable---there has simply been too much sign vandalism which has resulted in vehicles traversing areas to be closed and damaging resources and facilities. Under the proposed method of implementation. sign vandalism renders a road or trail as not available for use The end result is less resource damage

1204 CORVA Strongly objects to the following SPNM designations These proposed areas will further shut down access to existing or proposed trails In keeping with the "loop trail" concept. please consider the following changes to the ROS maps SPNM to SPM Location R34E,T22S. Reason to allow access on 33E28 to Sirretta Peak Note we are willing to relocate the trail out of the riparian area to mitigate problems with wildlife SPNM to SPM Location R33E and R34E,T21S Reason· Access lost from 33E22 to 33E24, from 33E22 to 34E23, 34E04 and possible rehookup of 33E22 to 33E19 to 33821 Note this area is very important to long time trail riders As Such connecting the above trails will help with the erosion problem on 33E22 Additionally. this will help with the Golden Trout Wilderness trespass problem

The ROS proposals for the Forest have been reviewed and changes made (refer to the Map for specifies) Management Team review resulted in two Changes involving the areas mentioned. The SPNM designation for the Sirretta Peak Area has actually been enlarged This was done in recognition of a fragile soil situation. to improve compatability with the adjacent Dome Land Wilderness. and in recognition of the Twisselmann Botanical Area, which has been established As such. OHV's will not be allowed in the Sirretta Peak Area

The SPNM designations in the Rattlesnake Area have been Changed to SPM As Such. OHV use will be permissable on designated routes

1300 The Sierra Nevada is our most valuable Water resource and OHV use end expanded grazing would be detrimental to the watershed 1 oppose any increase in grazing and OHV use The Kern Plateau at such areas as Manter Meadow are evidence of the damage by over grazing Areas such as Parker Meadow and Horse Meadow are now even beginning to take on the characteristic sand-grit border of the Kern Plateau

We agree with the respondent On the importance of water There is currently no intention or desire on the part of the Forest or the affected ranchers to Increase grazing on Sequia NF. particularly around Horse or Parker Meadow As discussed above, OHV use will be limited to designated routes and With management. we feel proper recognition of the water resource has been achieved

1400 We Should limit motorized intrusions into the Porest We should attempt to preserve the pristine nature of as much of the forest as possible Once the forest has been disturbed. it takes centuries to pass through the successional development required to return that piece of ground to its natural State Disturbance of the soil allows noxious weeds to grow gradually altering the character of the forest

Motorized use of the Forest is legitimate Proper management. as identified in the Preferred Alternative. will result in acceptable conditions

1500 This trail connection would encourage only the downhill usage of the switchbacks on Rattlesnake. minimizing erosion damage Rattlesnake could also be connected to the Beach Meadow area by opening 34E04 Both these connections would make very challenging loops possible for experienced riders Jackass Peak/Broder Meadows--As you well know. the ridiculous arbitrary boundary of the So Sierra Wilderness wiped Out our connection with the Monache Meadows area It is now Imperative a trail is made to reconnect these areas as your reps mentioned at the public Comments meeting We lost excellent loop trails to that wilderness and I feel the USFS can make this connection happen this summer (1986) Sierretta Peak Trail--Likewise, we lost one of the most desirable trail loops when the Dark Canyon and Woodpecker Trails were included in the

This comment contains a lot of specifies that are beyond the scope of the Forest Plan However. the comprehensive Trail Plan, which will be developed following approval of the Plan. will address specific trail routes and types of use This input will be considered during this planning process

Refer also to 104 above

expanded Domeland Wilderness This loop could be reopened by some reconstruction of the Machine Creek Trail (33E28) to motorcycle standards This would minimize erosion on the Sirretta Trail because it would encourage Only one way traffic Bonita Meadows — Reopen (if it is closed) 34E01 from Bonita Meadows to the Sherman Pass Road to give us a legal way to get to the Boone Meadow area without using the paved highway Little Cannell Meadow Area--This range/sawtimber area could be easily connected With the Southern Desert areas into the forest This trail could be connected to the Piutes via Wolfstaff Meadows. allowing a super neat, long distance. point to point ride With all kinds of changes in topography and scenery Scodie Mountains--I realize this area may already be destined for Wilderness Status. but I must insist that the road to McIvers Spring and the Scodie Trail (36804) remain open to motorcycles These trails I have ridden for 15 years and are some of the beat experiences in dirt bike riding in all of California I highly encourage the district manager to do whatever is possible to exclude these two trails from the wilderness by some kind of exception. (Bob Addison. Help us fight for the "C" status on your forest plan)

1600 I am in opposition to the Preferred Alternative Plan The Service appears to be an eager partner with such emminent benefactors of the American Forest as Suzuki, Kawasaki & Yamaha It can be reasonably argued that when Mr T Roosevelt invited the public to make greater use of the forests, that he did not envision an invasion by millions of monster machines and thousands of snarling. caterwauling off-road vehicles

We have no technical response to this expression of opinion. It should be noted. however. that the Preferred Alternative has been modified significantly from the Draft. The respondent is referred to Chapter 4 of the Plan for Specifics

1700 Opening connecting trails will reduce the potential for irresponsible riders to use Closed trails that connect to open trails Please allow the following trails to remain open for motorcycle use I Piute Mountain Area - 1) Trail from Steve Springs to Long Canyon (34E31) 2) Woolstaff Meadows down to Kelso Creek - well used unmarked trail 3) The trail from the Piute Mountain Road near Harris Grade Spring down through Burning Moscow Spring and down to Kelso Valley 4) The unmarked trail along St John Ridge II Scodie Mountain Area - 1) The main access road to McIvers Spring (27S11) and the unmarked motorcycle trail down "So Cal Hill" to Sage Canyon 2) The marked motorcycle trail down to Chollo Well (36E04) and the

Refer to 104 and 1500 above

Unmarked trail down Cane Canyon III Troy Meadow/ Sirretta Peak Area - 1) Open a new connecting trail through Machine Creek connecting Boone Meadow to the Sierretta Peak trail (34E12) 2) Open an access trail from the Fay Ranch area up to Cane Meadow using (34E28) or (34E24) 3) Keep open (34E01) the trail connecting Rattlesnake Creek with Beach Meadow (21S19) 4) Keep open the trails (34E16), (34E17) and the other existing *trails in* the Taylor/Little Cannell/Cane Meadows area 5) Keep open the existing trails in the Sherman Peak. Bonita/Boone/Durrwood Meadows area

1801 OHV map and the ROS map of the preferred plan - there appears to be a contradiction There are SPNM ROS *classes in* B & C OHV areas The OHV map is used to comply with EO11644, we maintain that it has precedence over the ROS map We do not see any way to manage a SPNM ROS in an OHV C area where the boundary is not some geographical line as a road or trail short of fencing

The Preferred Alternative has eliminated the open to cross-country "C" Zone and, therefore. eliminates the Conflict with ROS designation SPNM

1802 Specific SPNM concern areas are In the Piutes-4, the 2 northern ones have existing trails currently receiving moderate OHV use Breckenridge-3. Cannell Meadow-2 At the NW corner of the Dome Land there is 1 that crosses 33E28 Which Should be opened to connect the dead end 34E12 to the Sherman Peak (sic Sirretta Peak) area Along Rattlesnake Cr there is one on each side Id southern one an existing trail 33E24 gets illegal use that should be Opened to OHV use to Connect the dead end Stony Meadow Trail to the dead end Rattlesnake Trail In the NW corner of the Forest. there are 6 more

The ROS map for the Porest has been reviewed and revised It should be consulted for specific revisions to determine if concerns have been addressed for those SPNM areas broadly described Specifically. trail 33828 will not be available to OHV's -- the Sirretta Peak Ares will be included as SPNM (see 1204 above) The SPNM areas in Rattle-snake Creek have been revised to recognize conflicts with OHV's

1803 DEIS. page 4-13. Resource Outputs - There is no planned increase in the miles Of trail Open to OHV use We do not believe that the existing trail system is adequate. This Plan Should address some form of corrective action for this loss of recreational opportunity The plan acknowledges the "Statewide Trail System" which will require many new trail segments to complete

The Preferred Alternative allows increases in trail mileage Actual mileage and specific trails needed will be developed in the comprehensive Trail Management Plan (see Plan, Chapter 4).

1804 Page 5-6, Monitoring Plan - The Only recreation activity that is scheduled for monitoring is the "effects of OHV use on land and Other resources" Since most OHV activity is on existing trails. and Forest Service studies Show that OHV's do not necessarily have the greatest effect on the land or wildlife. It Would appear prejudicial to Only monitor OHVs Because of the documented conflict between timber sales and existing OHV routes. we

Monitoring the effects of OHV use on land and other resources *is* a requirement of EO 11644 The monitoring plan as shown in the DEIS has been revised and also includes other elements important in determining if ongoing management is within the scope of the Plan (refer to Plan. Chapter 5 for details on monitoring)

believe there Should be some formal monitoring of timber sales

1805 Page 3-88. Sixth Paragraph - Although in this paragraph the Statewide Trail System for OHVs is mentioned, the plan does not address whether this System is compatible and if it is, how it would be implemented The San Bernardino LMP's preferred plan States that there will be such a trail Page 4-66, OHV Use, This paragraph is one of the best stated management plans we have seen

The Preferred Alternative calls for coordination of trail planning with the Statewide OHV Trails Plan (see Plan. Chapter 4) It will be necessary for the Forest to undertake comprehensive trail system Planning before a determination of compatibility can be made and appropriate implementation schedules set for any part of the Statewide system Thank you for your compliment

1900 The FS admits to the damage done to the environment by ORV use and that the monitoring of resource damage is based on low level funding What assurance does the Public have that the monitoring funding will be increased to handle the increased acreage for ORV use proposed in the PRF Alternative?

The monitoring of impacts of OHV use will continue under various funding levels The intensity and types of monitoring will vary with funding. but problem areas will be addressed in priority order

2000 CORVA is aware of many outstanding OHV opportunities in the formentioned areas.

The knowledge and input of users will be useful as the comprehensive trail plan is developed as directed in the Preferred Alternative We look forward to working with CORVA and other user groups during this process

2100 An additional benefit of such an action would be to decrease areas of OHV use and provide a more balanced division of lands between OHV ana non-OHV users

The Preferred Alternative will limit OHV use to designated roads and trails and will establish emphasis areas for OHV use As such it will provide a balanced allocation of lands between OHV use and non-OHV use

2200 OHV's hardly seem congruous with the PCT It would seem that true multiple use of Rockhouse would designate at least part of the FPA as non-motorized Again. I must state that OHV use seems most incongruous with the PCT. which runs through the northern portion of the Seodies

The Preferred Alternative limits OHV use to designated roads and trails The PCT is closed to OHV use The specific trail plan to be developed for the Forest will determine which uses will be allowed on specific trails

Relative to the BLM Rockhouse Wilderness Study Area. Forest Service planning efforts are limited to a joint study leading to a determination/recommendation for wilderness Administrative actions beyond this (e g , nonmotorized management of specific areas) remains with the BLM

2300 Dispersed Recreation - Move system trails out of meadows Excellent! OHV's also

It is planned to move system trails, including those used by OHV's. out of meadows where resource damage is occurring.

2400 I agree with the proposed action map of the FS an the OHV's.

OHV use under the Preferred Alternative will be considerably different than that shown in the Draft. since all use outside wilderness (Which is closed to all vehicles) will be restricted to designated roads & trails, Forest-wide. Please

2500 DEIS, page 3-86 - The first sentence states "much of the Sequoia NP area is available far non-motorized activities " It is our understanding that all Of the Forest is available for non-motorized activity This whole paragraph applies to motorized activities Just as much as it applies to non-motorized activities In the second paragraph. the use of All Terrain Vehicles by the elderly and handicapped should have been mentioned Also, as was stated previously. there is no mention of exactly which roads are open to use by "Green Sticker" vehicles This is a very important issue with these two groups The statement that " the increase in OHV use as well as hiking and equestrian use will likely result in increases in conflict as competition for trails increases" can only be a result of a desire for conflict by hikers and equestrians or the Forest Service itself It was previously stated that only 4% of recreation use took place on the 24% of the Forest where OHV's are prohibited by law It is obvious that good and efficient management practices would dictate that all hiking and equestrian activity Should be directed to the wilderness areas and that outside of wilderness. it is multiple use The statement "at the same time. decreasing trail maintenance funding makes it more difficult to maintain trails to the levels necessary for OHV and equestrian use" totally neglects the availability of "Green Sticker" funds and as mentioned on Page 3-88. volunteer trail maintenance by OHV users As far as the quantity of trails open to OHV's is concerned. the determining factor is not money or manpower. it is the Forest Service Page 3-88. Fourth Paragraph - again the Subject of user conflict is raised Unlike the previous discussions. this time the position is that conflicts are minimized This is difficult to understand with only 4% of the recreational use taking place in wilderness Since this is a Management Plan there Should be elements addressing user conflict and how it will be managed This paragraph states that there are trails "designated specifically as OHV routes'. This is of course. not true All trails that are open to OHV's are open to any other user group Page H-7. 4th paragraph--While this trail is a limited hiking attraction with 31 persons per year signing the register. it is an important OHV trail With an estimated annual use of over one thousand

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check the Plan, Chapter 4 for specifics

All of the Porest is available to nonmotorized activities. However, Table 3 22 (Chapt 3, DEIS) indicates that much of the Sequoia land base is comprised of slopes over 40% and may not be useful for many recreation opportunities

The discussion on OHV's under Dispersed Reereatron in Chapter 3 of the EIS has been reviewed and Statements referring to use of mads by Green Sticker vehicles and Green Sticker funding added

Comprehensive trail System planning will make the final determination on the number of trails end their availability for certain uses Funding will be an important aspect of implementation of programs including those dealing With OHV's Additionally. volunteers will help considerably With items such as maintenance and rehabilitation/reconstruction of trails

The Preferred Alternative discussion on OHV's identifies user conflicts as one factor which may trigger a Forest order to resolve Each case will have to be assessed on its individual merits Therein. it is inappropriate to try to include a blanket Statement about how conflict will be managed in the Plan Rather, project level activities can best handle this matter

The Forest land base outside of wilderness will be managed under the multiple-use concept - including trail use However. this concept does not mean equal use for every resource type (timber. range. recreation. etc), or style of use Within a resource type. in any one area of the Forest. Trail design. resource protection, user conflicts, and ROS objectives will be some of the factors Used in determining the type of uses for each trail in the Forest trail System We are encouraging more equestrian and hiker use of the wildernesses by emphasizing trailhead facilities construction to facilitate wilderness access (Refer to Plan. Chap 4 Under Developed Recreation and Wilderness)

The Forest is pursuing the use of Green Sticker Funds For maintenance Of OHV trails The use of volunteers for maintenance of OHV trails has, and will continue to be an important program on the Sequoia NF However, adequate funding is critical for maintenance of a great portion of the total Forest trail system

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We have removed the word "specifically" from the statement. "Numerous trails Outside wilderness area designated Specifically as OHV routes" since these trails are not exclusively OHV trails

Under the Preferred Alternative. Sirretta Peak and the Ernest C. Twisselmann Botanical Area falls within an area to be managed under the Semi-Primitive Non-Motorized ROS class and are not available for OHV access.

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Snowmobile use should be limited to designated areas Snowmobiles seriously conflict With cross-country skiers	The Preferred Alternative identifies areas Where various winter recreational activities are emphasized Because of the high potential for conflicts, the separation of motorized and nonmotorized uses will be encouraged through user education and personal contacts (see Chapter 4 of the Plan)
101 Snowmobiles Should be restricted to designated areas Kennedy Meadows to Sherman Pass should be open to snowmobiles Snowmobiles Should be excluded from South Sierra area Of Kern Plateau. Cherry Hill Road to Cannell and Taylor Meadow areas Snowmobiles should be excluded from the proposed "C" Zone in the Hume Lake District Kern Plateau *area* Should be restricted to non-motorized winter sports	The need to do comprehensive planning for winter activities is also identified in the Preferred Alternative The identification of specific restrictions that will be placed on over-snow vehicles will be addressed during development of this Site-Specific plan (see Plan. Chapter 4)
200 Cross-country ski areas/trails should be developed Areas which Should be favored for cross-country are Big Meadows. South of Grant Grove (HLRD), and Slate Mountain (TRRD) Forest Service should provide parking, access, and control user conflicts Hut system Should be developed Develop Big Meadow/Stony Creek-Chimney Rock/Baldy Ridge on Hume Lake *Ranger* District with *cross-country* ski trails and warming huts with refreshments by private sector	Identification of specific trails or sites for Cross-country Skiing is outside the scope of this Plan and will be addressed during development of the site-specific plan Identified in Forest-Wide Standards and Guidelines The Plan does identify emphasis areas (on the Hume Lake and Tule River Ranger Districts) and provides for a hut system How it might be provided is a project-specific item yet to be addressed
300 Page 3-89. WINTER RECREATION OPPORTUNITIES - This section addresses snowmobiling, but a more versatile nomenclature which is used elsewhere is Over-Snow Vehicles	The wording has been changed as suggested
400 We recommend increased management for cross-country skiing in the Hume Lake Ranger District as an alternative to development of an alpine ski area	Cross-country skiing Opportunities on the Hume Lake Ranger District will receive management emphasis to help balance the needs of the winter recreation user Additionally, a potential alpine ski area has been identified in the vicinity of Mitchell-Maddox Mountains east of Big Meadows It is appropriate that this area be studied so a Sound judgement can be made about its suitability for development This study will follow the NEPA process
500 What kind of overnight cross-country skiing and snowmobiling Opportunities will be available on the Kern Plateau'	The Forest currently authorizes under special-use permits the kinds of activities discussed We plan to explore the need for commercial development and management of portable overnight facilities (huts) *to* promote and aid winter *snow* dispersed recreation (refer to Plan. Chap 4 under Winter Snow Dispersed Recreation)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 We ape in favor of and do encourage the development of the Peppermint Ski Area We feel it would be an asset to the USFS as well as surrounding area economies	We have no substantive response to this expression of opinion Our Final Environmental Statement on Peppermint establishes our decision to proceed With the development process
101 We do not oppose the construction of the ski areas We Urge that no other use of this land be permitted	We have no substantive response to this expression of opinion
102 New downhill ski areas Should be developed	The determination of Which. if any. downhill ski areas should be developed and the specific impacts from development are outride the scope of this Plan
200 No new downhill ski areas are needed	The determination of Which. if any, downhill ski areas are needed and the specific impacts from development are outside the scope of this Plan
Impacts of ski area development include road construction, waste disposal. liability against Government. law enforcement. degraded visual quality. degraded air quality. user Conflicts. adverse impacts on wildlife, vehicle traffic congestion and additional power lines Snow is not predictable	Development of Peppermint was Covered in a Separate EIS Consideration of other downhill facilities would also require following the NEPA process and would be undertaken only as demand warrants
300 I am writing to express concern over the proposed downhill ski facility at Mitchell-Maddox as outlined in the Sequoia National Forest Land Manage. ment Plan This area is right on the boundary of Kings Canyon National Park A ski resort would severely impact the national Park in the form of increased traffic, overcrowding, litter, poaching. and water. noise and visual pollution National Park has called for the creation of buffer zones surrounding the national parks	The language in the Forest Plan is to Study the potential for construction of the Mitchell-Maddox and/or Sherman Pass Ski Areas Separate EIS's will be done for each in which demand for skiing. potential effects on nearby lands (including wilderness) and on-site effects of their developement will be analyzed
400 This plan allows for the development of two ski resorts in the plan area in addition to the Peppermint mountain ski resort already being planned These resorts will attempt to use riparian rights to obtain this water for storage to use for snow making if any impoundment of water is considered under riparian rights for use by the developers of the ski resorts for snow making, such use is not in accord with California Law.	The wording in the DEIS may have been misinterpreted by the respondent The Plan does not allow for development of two ski resorts in addition to Peppermint Our intent. and the Final Plan so states, is to study the feasibility of Constructing either one of two sites (Mitchell-Maddox or Sherman Pass) The initiation of such a study Would be determined by demand for additional skiing opportunities, and would follow the NEPA process, that is, an environemtnal impact statement with full public involvement Specific issues. such as water and riparian rights. and snow conditione would be addressed at that time

500 New downhill ski resorts should not be permitted on the Forest unless they can demonstrate they will not require federal funds to provide access, lodging, utilities, and sufficient natural snow will be available to make them economically self-sustaining	We have no substantive response to this expression of opinion other than to note that virtually all major successful ski areas in California have some amount of artificial snow making and none are directly subsidized by the Federal Government
600 Downhill ski areas should not be established bordering wilderness areas	We have no substantive response to this Opinion other than to note it is possible in many instances to manage land up to wilderness boundaries Without compromising values of the wilderness This determination is logically made during project level Studies
700 Ski areas are a valid use of forest land However, there should be some form of assessment levied against the operators to Offset costs the Forest Service incurs Roads leading to Ski areas Should also serve campgrounds.	Ski area operators are, in fact. required to pay a percentage of their grass income to the Forest Service While these funds go into the U S Treasury, they are more than sufficient to cover the additional costs incurred by the Forest Service
800 Develop these ski areas Sherman Peak and Peppermint can be developed in such a way as to Concentrate the consequent disturbance to the environment in areas already served by mads and already semi-developed (in the case of Peppermint) I can also Support the expansion of the Shirley Meadow area	The Peppermint FEIS shows that Peppermint can be developed without unacceptable environmental effect Until a similar Study is completed for Sherman Pass, we wlll not know whether development of that area is feasible and acceptable
900 I recommend only two downhill ski resorts be developed. one on the east slope and one on the west slope	We have no substantive response to this expression of opinion Other than to State that demand wlll be an important factor in determining if future studies will be undertaken
1000 The Sherman Peak area is just northwest of the Domelands (sic) Wilderness While the demand for new ski resorts is growing, more consideration to environmental impacts are just as important	All environmental effects of development of Sherman Pass as a ski area will be explored in a separate, project EIS
1100 Abandon all plans to develop ski resorts Intensive development of this sort is inappropriate It is bad economies. and bad management The Peppermint Ski area is a massive boondoggle The proposed ski resort would cause extensive. irreprable damage to public lands in order to provide reereation for a relatively small number of people And. it would consume an estimated 271,000 acre-feet of water per year on-site, contributing to the water problems that already exist in the Valley below (A 171,000 acre-foot dam and reservoir would have to be built on Peppermint Creek to provide water for snowmaking That is greater than the capacity of either Kaweah Lake above Visalia or Success Lake)	The Final Plan directs that potential resort feasibility be Studied in detail consistent with NEPA requirements The reader is referred to the Peppermint Mountain Resort Final Environmental Impact Statement in Which these issues are addressed in detail It is important to point out here that the FEIS Shows the proposal to be within acceptable ranges of environmental effect It is also important to point out that the respondent is incorrect in the matter of water use Only 271. not 271,000 acre-feet would be used, not consumed The only consumptive use would be evaporative loss from the water Storage pond(s) and snow making equipment No on-channel dam and reservoir is proposed for Peppermint Creek

1200 I object to the inadequate manner in which the Environmental Impact Statement addresses the impact of the proposed Peppermint, Mitchell-Maddox, and Sherman Peak Ski Resorts The EIS does not adequately address the impact on wildlife and water quality. The Service has already approved the Peppermint proposal, despite problems with wildlife impacts, sanitation and difficult access I Support a thorough examination of these ski resort proposals by the Forest Service	Each proposed ski area does. or will, have a project-specific environmental impact statement that considers such issues as wildlife and water quality This will provide the thorough examination requested
1300 I would like to see more places for homes and lakes. and maybe a winter resort	We have no substantive response to this expression of opinion other than to note that up to three Winter resorts might be developed on the Sequoia National Forest over the long term However, development of homes on National Forest System land has never been authorized In the past. summer cabins (recreation residences) have been built under special-use permit on National Forest land In many areas. these are being phased out because public demand for recreational Opportunities continues to rise Sharply and those lands are now needed for public access or use Additional recreational residences will not be Considered on the Sequoia NF
1400 I Support the two proposed ski areas and accommodations for the elderly and handicapped	We have no substantive response to this expression of opinion other than to say that barrier-free accommodations for the elderly and handicapped will be a part of any recreation construction on the NF
1500 I oppose any new ski resorts re Shirley Meadows Every year that there is a shortage of snow, the owners complain about not making enough money to finish the improvements they have Started In meantime. the whole mountaintop is a mess of earthmoving equipment. torn up trees, trailers. piles of earth. etc After each skiing season. the Surrounding areas look like trashdumps Do not need more of these "resorts", the one we have cannot attract enough skiers nor expect enough snow to make a profit on a regular basis	Any new ski area development is closely governed and monitored under the terms Of its environmental impact statement. prospectus. site development plan and EA, and special-use permit These documents establish parameters for construction and operation (including clean-up) of the resort
1600 We Support the plan for skiing end a lodge in the Sherman Peak area	See 1000 above
1700 Mitchell-Maddox I strongly support a destination bound ski resort for Mitchell-Maddox I have walked many times over this area and find it to be a superb area which would be conducive to large scale ski development. Realignment/relocation of the Big Meadows Would be a necessity Base lands are private	We have no substantive response to this opinion Other than to note that such things as realignment of the Big Meadows Road would be analyzed in a project-specific EIS (also see response to 300 above)

1800 We feel that skiing is a beautiful sport and can be done in our National Forest with minimal damage to wildlife and their habitats with careful conscientous planning Put in trams from resort to closest already developed areas Would reduce driving hazard on very dangerous roads Would leave skiers rested for their return trip to their homes Would reduce air pollution Would cut down considerably on sewage problems Keep building and facilities to a minimum Food. rest. refreshments during the daytime activities Keep the area as natural as possible Provide cross-country trails that can be used for hiking trails in the summer Tram could be used all year around as they do in many other areas The tram would take some more initial Cost. but in the long run Would save road maintenance and enlarging, widening of bridges, adding of additional turnouts Less construction - use of already established sleeping facilities. hotels. motels. etc

We have analyzed the feasibility of rapid transit (trans. etc) for Mineral King and Peppermint. and found that the cost is much greater than the cost of road improvements. etc At thls time, there seems to be no way to develop an economically feasible rapid transit system to serve these ski resorts Nevertheless. thls option will continue to be explored in future ski area EIS's on the Sequoia National Forest

1900 The PEIS (Peppermint) states that the sewage effluent will be disposed of by percolation and/or irrigation and will not be a terciary treatment plant We need experts to cheek the USFS data on nitrogen or direct affluent pollution of streams (Peppermint Creek). the Kern watershed. and Lake Isabella The problem of sewage has not in any way been effectively addressed

Please refer to the FEIS for Peppermint Mountain for details on this matter

2000 Emphasis on downhill skiing development assumes a continuing future demand. while present information shows a lack of interest in commercial development in areas with short and unpredictable snow seasons, owing to the high Capital outlay required The Sequoia Forest planners are being challenged to provide an economic package attractive to private ski resort investors - hardly the intended purpose of managing public lands

The Preferred Alternative provides for Study of two resorts on the Forest. if demand indicates the need Each proposed Project will be judged on its own merits

2100 Page 2-23 DEIS The Forest Service Cannot have a complete range of alternatives if direction common to all alternatives assumes the construction of the Peppermint Ski Area This Ski area does not exist The Slopes of thls area currently are in the Slate Mountain roadless area. so there should be alternatives which keep this land undeveloped The environmental impact statement for the Peppermint Ski Area is under appeal, and one of the issues raised by the appellants is violation Of the National Forest Management Act by the project preceeding the Sequoia NP Land Plan and DEIS. If this forest plan does not consider a range of alternatives which

Several very recent documents, Which were done in conformance with existing planning direction and which had extensive public Involvement. are being incorporated into the Forest Plan The Golden Trout Wilderness Management Plan and the Peppermint Mountain Resort PEIS are two examples In our judgement these inclusions are consistent with NFMA Regarding the Slate Mountain Roadless Area. this area was released by Congress for "on-wilderness use via the 1984 California Wilderness Act There is no requirement to show a roadless option in either the Forest Plan EIS or the Peppermint EIS The respondent is referred to Appendix C of this EIS for dis-

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includes no ski area, then it, too, is legally deficient

cussion of how this released Roadless Area is handled under the various alternatives. Finally. it is not improper to proceed with the Peppermint project before the Forest Plan is complete NFMA explicitly States that Pending completion of the new Forest Plans. the Forests are to be managed according to the plane now in force The Tule River Multiple-Use Plan provides for study and possible allocation of slate Mountain as a potential ski area By proceeding with the Peppermint EIS and Subsequent allocations. we were following the direction of the plan now in force for the Tule River District

WHITEWATER BOATING (196)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---

100 Whitewater rafting on the Kern River needs to be more tightly controlled.

In particular, use from Riverkern down has adversely impacted local residents with

1 Traffic conjestion and Safety problems
2 Conflict with fishermen and Swimmers
3 Sanitation problems
4 Trash and litter
5 Noise
6 Erosion of river banks and disturbing wildlife

Suggests Setting aside limited areas of the river for rafting, with rafters paying fees or building facilities to support the rafting program Areas set aside for rafting should be those that are not wild. residential, or used for camping

---FOREST SERVICE RESOLUTION---

The Preferred Alternative calls for continued Implementation Of Kern River Whitewater Floating Management Plan with periodic evaluation (see Forest-wide Standards and Guidelines - Water-Oriented Use)

The specific information presented here has been and will continue to be considered during the evaluations of the Kern River Whitewater Floating Management Plan It is important to note that boaters can access the river just below Riverkern Beach without entering the National Forest Boaters using the river in this way down to Kernville are entirely outside of National Forest jurisdiction Further. the number of commercial rafting operations on the Kern River is limited Fees are paid to the FS by these commercial rafting companies under special-use permit. However, the Forest Service does not have authority to charge others (private parties) a user fee. this Would require Congressional Legislative action and is outside the scope of this Plan The Kern River Whitewater Floating Management Plan establishes specific direction for the River where boating may occur Monitoring and evaluation provide on-going feedback to managers If additional restrictions on users are necessary. this can be done within the parameters of this Plan

ROS (RECREATION OPPORTUNITY SPECTRUM) (198)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---

100 How is ROS acreage going to be tracked so it can be determined if Plan objectives are being met?

---FOREST SERVICE RESOLUTION---

The Preferred Alternative Shows the lands allocated to the various ROS classes Site-specific environmental assessments will be used to determine how projects Will be accomplished, but Will not change ROS allocations in excess of that shown in the Plan.

200 Dennison Peak It is misleading for the FS to say that since no roading will take place. the naturalness of the area will generally be maintained Or, despite the area not being designated wilderness. it will continue to be managed as a backcountry unit in a manner similar to wilderness. Visual quality objectives in the area are primarily "modification" and, to a lesser degree, "retention." Grazing improvements will further degrade the naturalness of the area as would the level of OHV allowed under a Roaded Natural Recreation Opportunity Spectrum (ROS) classification.	The Porest Service believes the naturalness of the area Will generally be maintained during the planning (10-15 year) period under the Preferred Alternative. No additional roading is planned, and. in fact. most of the area has been placed into a SPNM (Semi-Primitive Non-Motorized) ROS class The Visual Quality objective for the SPNM area is Retention Some prescribed fire may be used for range and wildlife vegetative treatment/improvement purposes at various times within the planning period This will have an insignificant change on the naturalness of the area since the opportuntiies for this type of management are limited
300 These areas Still have wilderness value which should also be protected in semi-primitive non-motorized recreation prescription The Forest Plan appears to lack a true semi-primitive non-motorized prescription The plan should have a new prescription exclusively providing semi-primitive "on-motorized recreation with logging prohibited, road building prohibited, and wilderness qualities preserved	The Preferred Alternative has identified areas Of the Forest where the Semi-Primitive Non-Motorized ROS class will occur These areas will provide a semi-primitive recreation Opportunity However. they may also contain primitive roads which are closed to public use and they may also be Subjected to very limited (unregulated) timber harvest (e g . one entry for natural losses every 15-20 years)
400 Over half of all the existing use in the Moses area Is in the semi-primitive non-motorized ROS class. while less than half this amount is motorized Again. wolverine and fisher are known in the area Additionally, black bear are common in the area, and the entire area is either key winter range or is summer or transition range for the Tule River deer herd A significant number of pristine fisheries exist in the area Opportunities for solitude and primitive recreation are generally high and two sensitive plant species are found in the area Despite the above values, the SQF has targeted the area for extensive timber harvest Five individual sales. and approximately 19 miles Of road are planned for the area between 1986 and 1995	The Moses Further Planning Area will be managed for its resource outputs during this planning period. All activities including the protection of sensitive plants. wildlife species. fisheries. etc will be addressed with Specific project environmental analyses as the planning period progresses
500 Wilderness or semi-primitive "on-motorized designation for released and other roadless areas Black Mtn , Slate Mtn , Cannell. South Sierra. Rincon, Chico, Mill, Lyon Ridge. Greenhouse Creek. Agnew. Kings Canyon. Woodpecker, Domeland addition. Jennie Lakes. Woolstaff	Portions of these areas mentioned may be maintained in a Semi-Primitive Non-Motorized ROS classification (refer to ROS Map for specifics) However, the majority of the areas will be opened to other non-wilderness activities See comment 700 below
700 The roadless areas that the Forest Service is not required to consider for wilderness should be protected as semi-primitive, non-motorized areas These areas, 331,649 acres, are the Agnew. Black Mountain. Cannell, Chico, Cypress. Domeland Addition. Greenhorn Creek. Jennie Lakes. Kings canyon.	All or part Of several Roadless Areas mentioned were made wilderness under the California Wilderness Act of 1984 These include Agnew (Monache Wilderness). Jennie Lakes (Jennie Lakes Wilderness), South Sierra (South Sierra Wilderness) and Woodpecker (Dome land Wilderness) Other Roadless Areas identified in the

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Lyon Ridge. Mill, Rincon, Slate Mountain, South Sierra. Woodpecker, and Woolstaff roadless areas.	RARE 11 process have been mapped by ROS class following established criteria. As a result. classes range from Roaded-Natural to Semi-primitive Mon-Motorized, and will be managed accordingly Criteria for ROS class delineation is remoteness, size. evidence of humans, social and managerial setting
800 The plan does not protect all of the roadless areas All of the further planning areas. Scodies, Oat Mtn, Dennison Peak. and Moses must be placed in the semi-primitive. "on-motorized (SPNM) category and appropriate wilderness recommendations must be made The fact that these areas were not designated as wilderness in the Calif Wilderness Bill does not mean that they should not be protected The spiritual values of going to an area that is in a truly natural state and recognizing our American heritage of wilderness values Cannot be overemphasized The following former RARE II roadless areas Should also be placed in the SPNM catagory for their protection Black Mountain, Slate Mountain, Cannell. South Sierra. Jennie Lakes. Rincon, Chico, Domeland Additions. Mill, Lyon Ridge, Greenhorn Creek. Kings River. Agnew. Kings Canyon. Woodpecker. Woolstaff, and Cypress	Many of the Roadless Areas identified under the RARE II process were subsequently released via the California Wilderness Act of 1984 for multiple-use management Other areas were placed in a Further Planning category Those Further Planning Areas which are the responsibility of the Sequoia have been reviewed under this PEIS Each has been mapped by ROS class ranging from Roaded Natural to Semi-Primitive Won-Motorized Protection/mitigation of these areas will be considered through ROS objectives. the NEPA process (which calls for an environmental analysis for any proposed project within their boundaries), and the land management prescriptions designated by the Preferred Alternative
900 Since so much of the forest plan refers to the various recreation opportunity spectrum classes, it is not enough to reference the "Recreation Opportunity Spectrum Users Guide " Reviewers have no way of determining the proposed management of the Sequoia NP if they do not have a copy of this guide The management theme for semi-primitive. "on-motorized areas could be greatly affected by the management prescriptions allowed	A basic Understanding of ROS can be found in the Glossary and in Ch 3 under Recreation in the PEIS The ROS Users Guide is available for study at each N P District Office and the Sequoia N P headquarters in Porterville

WILDERNESS AREA MANAGEMENT (199)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Include in wilderness areas and on Wild and Scenic Rivers. special paths and facilities for the aged. the handicapped. the disabled and the very young	Needs of elderly and handicapped individuals will be considered in development of recreational facilities at developed facilities on the Forest An emphasis will also be placed on development of barrier-free trails in certain areas (e g , near campgrounds for interpretive purposes) (see plan. Chapter 4) Developments (that is. trail facilities) for handicapped, disabled. etc, within wilderness or wild and scenic corridors will generally not be done with specific emphasis toward this group Trails will vary from easy to most difficult These groups may be able to use some of the easier trails.

	(199) but should not anticipate using the more difficult sections Users should plan to check with local ranger stations for specific trail information prior to Starting a trip Certainly. artificial barriers to elderly or handicapped individuals will not be created
200 All maps in the DEIS and Forest Plan indicate Dome Land Wilderness begins at the north end of a riparian sliver extending a mile into the Forest in what Should be Wilderness. We object to this We believe Segment 1 of the South Fork should Stop on the west boundary of Section 24 We ask you to change your designation of Segment 1 and begin Segment 2 at the same Forest boundary. above which the river is wild and scenic and properly classified "Wild" as you propose in the Preferred Alternative and in the Forest Plan	The boundaries of the Dome Land Wilderness have been Set by Congressional action and are outside the scope of this Plan We have checked the map and it is correct as printed Segmentation Of the South Fork of the Kern River is based on major changes in land management emphasis and. as such. will remain as originally defined This question became a moot point when Kern River Wild and Scenic River legislation was enacted and established the actual river segments (and Used the Dome Land Wilderness Boundary)
300 It is not clear from the table showing wilderness use if the base year of 1982 includes the same areas as that for the following five decades Since additional wilderness areas were designated by Congress in the California Wilderness Act of 1984, it would be helpful to know If wilderness use for these new areas and additions is included in the 1982 base year	Wilderness use shown for 1982 is only for those areas that existed at that time, namely. the Dome Land & Golden Trout Wildernesses All figures Shown for the 5 decades include those established in 1984 also A note has been added to the tables in Chapter 2 of the FEIS & Chapter 4 of the Plan to clarify this matter Thanks for pointing it out

SPECIAL INTEREST AREAS,GENERAL (210)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The plan should recommend establishing all five proposed Botanical Areas The final biological inventories for these areas Should be priority items and budgeted for in the final plan	The final Plan establishes all five Botanical Areas based on public comment

RESEARCH NATURAL AREAS (211)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 There should be a strong statement for recommendation of establishment for the Research Natural Areas Current direction is inadequate	Recommended changes in wording have been made
200 The four recommended Research Natural Areas should be established. but priority should be given to establishing these in commercial forest sale areas for baseline purposes	The Sequoia's program of Research Natural Areas is a part of a coordinated effort to preserve areas for scientific study throughout the Region which covers most forest ecotypes found in California Our direction is to achieve a balance between the need for forest products today and research needs of tomorrow All three RNA's on the Sequoia National National Forest are recommended to the Chief for establishment

(211)

300 Where is the policy statement regarding Research Natural Areas? Why are there no RNA management objectives which are as clear and decisive as for other elements?	An RNA prescription has been added Actual management will be dictated by the individual establishment reports when completed
400 Many more Research Natural Areas, Botanical Areas. and National Natural Landmarks should be proposed The plan only proposed four RNAs This is not even close to the potential number and size of areas which deserves this designation	The Sequoia's program of Research Natural Areas is a part of a coordinated effort to preserve areas for scientific Study throughout the Region. covering most forest ecotypes found in California Our direction is to achieve a balance between the need for forest products today and research needs of tomorrow Botanical Special Interest Areas have been selected with aid from the California Native Plant Society They serve an entirely different purpose These areas were selected to protect resources with unique characteristics and to foster Public use and enjoyment of their significant values The non-conifer RNA target elements were deferred to the next round of forest planning The National Registry Of the National Natural Landmarks program is administered by the National Park Service In all cases, their recommendations replicate the same areas that have been identified for our Research Natural Areas and Special Interest Areas.
800 A budget as well as a specific monitoring objective Which ensures the establishment of each RNA Should be included	The budget prepared for the Preferred Alternative reflects the needed funds to prepare establishment reports There will be no Other management activity associated with these areas and nothing to monitor

SPECIAL INTEREST AREAS (212)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The Moses Mountain RNA and Long Canyon RNA Sites Should be established as National Natural Landmarks.	These areas will be evaluated in coordination with the National Park Service for designation as National Natural Landmarks In general. these areas are protected under other designations or proposed status as RNA's

TIMBER, GENERAL (230)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 What is a timbered compartment,	A compartment is a division of forest land defined by natural and human features usually between 3,000 and 15,000 acres in size, used to facilitate planning The term "timber compartment" refers to areas where timber is growing and timber harvest is a potential use of the land
200 1 do not think it is realistic to try to increase both timber harvest and recreational use as you propose	It is realistic to increase multiple land uses as long as the level of use is compatible with biological and/or other defined capacities Of the land base The Land Management Plan will attempt to provide the most Optimal and compatible mix of land uses that satisfy identified issues and concerns This mix will always involve compromise
300 We request you give serious consideration regarding the effect on our County's economic growth	Chapter 2, Section B of the EIS describes how alternatives are developed Chapter 2, Section E-6 summarizes how alternatives differ in the production of resource values The Preferred Alternative will offer a reasonable compromise in trade-offs between competing resource values
400 feel Strongly that issues be Carefully weighed against social. economic and environmental factors	Please refer to 300 above
500 The MKT alternative will be in the best interests of the people	These are statements of value for which we have no Substantive response
600 , The level of timber management will tend to stifle future development of the timber industry	See Response #300
700 You have built in the potential for future conflict and economic hardship	The Plan is a dynamic one which is subject to periodic review and adjustment If unforeseen Conflicts and economic hardships result. the Plan can be modified to the extent that the modifications can be implemented With sound resource management
755 Clearcutting induces increases in available water water has value this value Should be shown somehow as a timber value	The computer model PORPLAN uses the value of water in determining the timber harvest
800 Most of the output levels anticipated could be realized with a lower budget Why did you not produce such an alternative?	The FEIS examined a wide range of budgets as required by NEPA
850 The socio-economic environment of the forest extends well beyond Kern and Tulare Counties	The majority of the direct effects of the FEIS and Plan are on Kern and Tulare Counties We have also added a discussion of broad level timber supply effects in Appendix O, FEIS

900 If the annual cut was reduced The economy of our community will be drastically affected. Our firm is very dependent upon wood products in our design	Timber and related industries affected by timber harvest levels an the Sequoia NF are indeed recognized as a major issue in development of the Sequoia Land Management Plan Effects on receipts to counties. jobs and community employment are considered in the development of each alternative The intent of the Recommended Alternative is to strike the best balance between trade-offs in all of the various resource values
901 The proposed plan considers only 1,080 people as being directly affected by the actions of SQF There are far more than this estimated 1%, actually, 3,240 to 5.400 jobs are created by companies Which provide services to the timber industry It is estimated that for each employee directly involved in the industry 3 to 5 more jobs are generated Nearly 100,000 people are employed by the timber industry in California These individuals and companies will be severely affected with any decrease in timber production	When dealing with effects Concerning employment, the FEIS considers only those Jobs locally affected by timber harvest on the Sequoia National Forest. not those in the wood products industry and its suppliers throughout the state The Sequoia's Plan clearly affects the former. but only tangentially influences the latter We recognize that non-local jobs are indirectly affected. however, the degree to which they are is not separable Because the Preferred Alternative Shows no change in historical levels. no change in employment due to the Sequoia's harvest level is expected See Appendix O in the FEIS for a discussion of broader level timber supply effects
1000 The DEIS and the Plan bath recognize Tulare County's timber Industry Both documents are silent on timber industry employment elsewhere. including Kern County	It is true the DEIS did not consider timber industry employment in Kern County Since publication of that document. however, the mill at Inykern has been closed permanently Thus there is no Kern County timber industry to discuss. Otherwise. the discussion of industry employment was intended to focus on local, not statewide levels Please see Response #901 above for further information
1100 Wood products company employees and relatives work at a variety of volunteer and service jobs in the community	These activities generally improve the quality of life in the community
1200 wood products workers have the same dependence on and proprietary interest in good resource management that you have ascribed to the ranchers	We have added a discussion of this to Chapter 3 of the FEIS
1300 The social and economic benefits for non-timber resources that are enhanced by timber activities should be directly displayed	Benefits to non-timber resources from timber management activities are described numerous times in the FEIS and Final Plan Quantification of these benefits. however. would be difficult due to their intangible nature and change in effect over time
1400 If the Forest Service were to adopt a Significantly more restrictive herbicide policy, it should consider new alternatives	For the planning period, We do not anticipate a more restrictive herbicide policy If the herbicide policy does become more restrictive and monitoring indicates future yield goals may not be met, then

	(230) corrective action as described in Chapter 5 of the Plan will be implemented
1450 The proposed draft plan falls short of meeting demands for wood fiber Yet all other factors meet or exceed the guidelines . Wildlife habitat needs are met and minimums are exceeded Habitat is provided for 105 pairs of Goshawks 130 pairs of spotted owls streamside management zones are extended to include intermittent streams	You are incorrect in assuming habitat for 105 pairs Of goshawks and 130 pairs of spotted owls will be protected exclusively for these species The FORPLAN modeling table. from which you derive your figures. lists the acreage available and suitable for these species. not what will actually be managed and protected Please refer to the Management Indicator Species section of Chapter 3 of the Final Plan for more detailed information pertaining to the management of these species Also. the table figures for spotted owls have been revised Your comment concerning Streamside management zones is correct
1500 The use of the 1982 base year is misleading	Use of 1982 was needed for consistency With the 1985 RPA Timber harvests were depressed in 1982, but not timber sale Offerings Sale offerings are what are compared in the FEIS
1600 .. A more detailed analysis of demand. .. would help the reviewer understand overall market demand picture .	We have added Appendix O, FEIS. to discuss a broader level timber supply demand situation Also, see discussions of demand in Chapter 3 of the FEIS
1700 The analysis of timber impacts would be considerably strengthened if the beneficial impacts were also identified. displayed. and valued	Thank you for your comments Please refer to Comment #1300 above
1800 We disagree With the projection of those cost trends into the future	The timber cost increases used were based on the projections of per capita disposable income As Stated. thls is "because timber management cost increases have historically been highly correlated with increase(s) in per Capita disposable income " The basis for this assumption is supported by Haynes, et al , as referenced This does not mean that timber management costs are based on the public's ability to pay It only States that in the past. the two variables (timber management costs and per capita disposable income) have been correlated The reason for this correlation is the high labor Content in timber management activities and the need to pay competitive wage rates Whether they will continue this correlation is only conjecture It is the best information available at this time At the end of the planning decade. if our assumptions have not been borne out, we will revise our projections and EIS
1900 Projections of timber yield appear to be conservative ..	Our timber yield projections are based on the best information we have available at this time See comment 1800 above

2000 The ten-year timber sales program After the second year it is merely a vague statement that some volume will be sold	The five-year sales program was not well defined by timber sales past the second year at the time the Draft Plan was written This was due in part to the uncertainty created with the timber buyback program The Plan does show the planned sell volume by species for each District for the last eight years of the planning decade This program is continually monitored and updated as necessitated by management The quantities will be evaluated at the end of the Planning decade along with the rest of the Plan and revisions will be made for the second decade
2100 Neither is there a discussion as to the treatment of backlogs in planned Outputs for timber or for Other resources	The backlogs may or may not be made up The timber sale program is driven by Congressional appropriations If we are funded at a level Commensurate With the Plan. we can produce the planned timber Outputs If at the end of the planning decade we are not on schedule, appropriate adjustments will have to be made
2200 should analyze the potential effects of budget shortfalls	We have added Appendix L in the FEIS to discuss budget effects
2300 anomalous budget increases for the fifth decade	The budget increases referred to might be explained by increases in Chaparral treatment Which translate into increased grazing
2400 , Much of the incremental gain in water yield is induced by timber harvest	The increased water yield comes from increased runoff from the acres where the vegetation has been removed or altered This could occur by timber harvest, increased wildfire, increased prescribed burning Of chaparral. increased road construction. etc Much of the runoff comes in the Spring from snowmelt The snow melts earlier *from* the openings and has less opportunity to be retained on the Site for plant growth or to be evaporated The increased yield translates into less water retained on or evaporated Prom the Forest and more Water in the reservoirs for recreational and agricultural use
2500 regulated timber harvest acreage by prescription and by CAS determination do not agree	AS listed in Appendix C of the Plan (Table C 1), 35.000 acres on the Forest are used Pop unregulated harvest and 276,000 acres are for even-aged management (regulated) The remaining lO9.000 acres include areas managed using uneven-aged methods and spotted owl habitat (see also Table C 11)
2600 . monitoring would be strengthened by a discussion of ways and means to make corrections if and when deviations are detected	Weaknesses in the monitoring process for the Forest Plan were recognized The Final Forest Plan contains Stronger and mare specific monitioring requirements Please see Chapter 5 of the Plan for the revised monitoring plan

2700. The plan should strive for improved economic efficiency	Achieving the highest net public benefit and becoming more cost efficient is a mandate under NPMA See Chapters 1 and 2 of the Plan. and Appendix D Of the EIS
2800 The FS should identify. the potential for sustained Yield of timber. based on a careful financial evaluation . NF lends yielding negative net timber receipts Should be identified as economically unsuitable for timber production the FS Should introduce a phased reduction of uneconomic timber harvesting	The biological potential for sustained yield of timber Prom the Sequoia N F bas been established The economics of the timber sale program is a more elusive subject The Forest Service is required by law to manage the National Forests for multiple-use The real measure of the worth of the timber program is not Costs versus revenues, but costs versus public benefits Public benefits can be measured as receipts and as the dollar value of benefits for which revenues are not received. such as recreation Unfortunately. some benefits are impossible to value in dollar term or other readily quantifiable measure In the broader context. sales with revenues less than costs are Justified when important non-timber objectives, which are Justified on their own merits. are being provided and the timber program is the most cost-effective way to achieve those Objectives Another Consideration is that many communities rely on National Forest timber for a significant portion of their economic support
2901 We are/I am opposed to the Plan on the Sequoia National forest concerning increasing timber harvesting because 1 The yield rate is too high. sawtimber should be stopped or drastically curtailed. not escalated from 97 MMBF in 1980 to 136 MMBF in 30 years 2 Planners have overestimated future growth in existing trees and in regenerated Stands. therefore the timber industry Should be directed towards selective cutting methods in areas already logged, not towards virgin forests 3 Further Planning Areas and released roadless areas will be opened to timber production 4 Marginal areas. those with poor soil, difficult terrain and arid climate. are not considered with correct Judgement concerning timber harvesting This constitues poor regeneration and problems with erosion 5 Timber production is the primary use of more than 70% of the forest (294,000 acres), and and therefore the plan does not consider the primary users of the forest. 6 Old growth timber is negative growth timber. harvest of these Stands is economically unsound, these trees cannot be replaced as they are now 7 The Giant Sequoia should not be harvested	The modeling process described in Appendix B of the FElS allows all lands to be available for all uses, within constraints imposed by the theme of each alternative The computer model. FORPLAN. then solves for the particular allocation of resource uses that produces the maximum present net value In this process nonfinancial values, such as wilderness experience. are evaluated and chosen to the extent that they contribute more to public benefits then do values with a financial return In this method of resource allocati n the intent of the 1960 Multiple-Use Sustained Yield Act is fulfilled Multiple use is Optimized. but few. if any. specific uses are maximized The above response is applicable to paints 1.3.5.7.8.11.13-15 and 17 Response to Other points are as follows 2 A detailed review of modeling methods and assumptions has shown that expected timber yields from existing and regenerated stands are reasonable and even conservative 4 The process for selecting lands suitable for timber management is described in Appendix C of the Plan 6 Harvest of mature timber is generally more economically Sound than harvest of young timber It is true that we do not expect to maintain trees

8 It promotes clearcutting
9. The housing market and construction trade is uncertain at this time
10 The Forest Service is competing unfairly with owners of private timber lands.
11 It provides for building more than 800 miles of new mads. 17-26 miles per year. and only 21 miles Of new hiking trails over the entire 50 year planning period. The logging roads cause additional expense at the taxpayers loss. and decreases and damages existing foot. and ORVAC trail network
12 Cutting trees will cause damage to water quality. heavy drain on the forest soils. increased noise and air pollution and an increase of the level of carbon dioxide in the atmosphere
13 It decreases visual quality
I4 It decrease vegetation diversity, promoting a monoculture forest system. and therefore decreases wildlife through destruction of their habitat
15 It will eliminate recreational uses
16 It will decimate the forest ecosystem
17 Rim-to-Rim protection is essential to maintaining the health of the rivers associated with logging within river canyons
18 All streams must be protected on all sides for at least 150 ft from timber harvesting
19 Timber harvesting does not generate enough revenue to cover long term Costs. especially during times of budget cutting. such as Gramm/Rudman
20 Increases in timber harvests are difficult to justify in light of the current glut of the tlmber market causing companies to cancel contracts. and in terms of SNF annual dollar loss, as much as 40% on each sale from timber operations Subsidies to timber industry are at the taxpayers expense

Older than about 110 years on lands managed with an emphasis on timber production
9, 10. Economic predictions are certainly debateable However. we used the most reasonable assumptions and trends available to us
12, 16, 18 The mitigating requirements for each project or timber sale are developed on a site-specific basis by professionals end specialists to protect the land and the life-forms associated with it and to meet legal requirements.
19, 20 The Forest Service is mandated by law to manage the National Forests for multiple-use As a consequence. the timber program. as well as all other National Forest programs. must be evaluated in terms of Costs versus all public benefits Revenue earned from the sale of timber is just one of these benefits Congress did not intend that the National Forests be managed in a manner that would ensure that revenues exceed Costs.

3000 you have Included such alternatives as MKT and FRO so that you can scale back the more extreme proposals .

The MKT and PRO Alternatives emphasize market Outputs As such they establish one end of a spectrum of alternatives ranging from emphasis on market Outputs to emphasis on such nonmarket outputs as recreation

3100 The volume of timber harvested in AMN is extremely low Reg Class 1 harvest is not as efficient as II or III . It is not clear if the 17,000 acres constrained to Partial Retention are all CAS acres P G-1 thru 24 This is an excellent attempt on a difficult subject. but it remains highly biased towards even-aged management

The reason the timber harvest level is relatively low is that amenity values Such as visuals are given a higher priority in the program formulation Neither Modification nor Maximum Modification Visual Quality Objective is allowed in the Amenity Alternative AMN was reformulated to eliminate even-aged management This results in no clearcutting and a greater emphasis on uneven-aged management. thus. one reason for no Regulation Class I harvesting in AMN (which may result in Modification or

	(230) Maximum Modification) The relative efficiencies in the different harvest Systems did not determine the outcome The model was only using CAS acres in the solution However, in practice. salvage will be done on "on-CAS acres where fire. insects and disease. or Other natural phenomenon has killed trees
3200 . method of delineating vegetation types is inadequate in that it does not sufficiently illustrate critical habitat types	Critical habitat types. mainly attributed to wildlife and plant species, are displayed in other documents, where map resolution is greater This insures that the boundary and ares locations of these habitat types are clear to all personnel involved in managing the Forest resources Examples of such documents include Condor Recovery, Peregrine Falcon Recovery and Deer Herd Plans All of these documents are available for review upon request at the Forest Office in Porterville
3300. harvest of Black Oak will reduce wildlife	Management direction given in Chapter 4 of the Plan requires that hardwood species, especially oak. be maintained in sufficient amounts to insure viability of species dependent on hardwoods
3400 How will you protect snags Prom woodcutters over time and provide replacement for those lost?	It is impossible to protect all soft snags As described in Chapter 4, Section F of the Plan we do have direction in the Plan to provide habitat for wildlife species that are dependent on snags We are preparing Environmental Assessments for each project Wildlife biologists are evaluating the projects in Order to ensure that sufficient quality habitat is provided for the affected wildlife Management has determined that the snags provided through the timber sale program *are* Sufficient to to meet wildlife requirements
3500 Why hasn't the Sequoia developed prescriptions with protective wildlife standards governing timber timber harvest Such factors as 1) limited harvest seasons and vehicular travel in key deer areas 2) modification of Cutting Units	We Peel that such rigid Standards are not sufficiently flexible to provide the Correct treatment for each project We prefer to analyze the site-specific needs of the affected wildlife and document the needs in our Environmental Assessments
3900 aerial harvest methods are much more amenable to uneven-aged harvest There are numerous benefits to unevenaged (management) on Steep slopes	Appendix G of the FElS discloses the complete state-of-the-art knowledge. in condensed form. on *even-*aged and uneven-aged systems of timber management Uneven-aged management is described in the Standards end Guidelines Aerial harvest methods will be evaluated for use in the Sensitive areas at the time the project EA's are prepared
4000 I am pleased to see Sequoia reforestation in the Plan .	These are statements of value for which we have no substantive response

4100 be sure that full utilization of the capabilities of the helicopter System has been considered	The Sequoia NP has used helicopters in many projects. The need for special requirements such as helicopter logging is evaluated through the ID Team profess and is documented in the Environmental Assessment
4200 Enough of the Forest has been devoted to non-use wilderness	Refer to #200 under "Wilderness".
4300 timber industry representatives and recreationists have expressed to me their concern over the practice of clear cutting	Table 2 25 in the PEIS summarizes how much Clear-cutting is done in each alternative The environmental consequences of each alternative are discussed in Chapter 4 Of the PEIS
4400 , You must pay the companies for the roads they build while cutting they are cutting vast areas completely without doing any replanting	Often the timber purchaser build roads without payment The public receives the road as long-term capital investment in return for lowered timber prices In addition. they maintain those roads and perform many Other "services" which benefit the many varied users of the National Forest The timber purchaser is required by law to pay to regenerate the stands they cut Environmental analyses are made for all our timber Sales The lagging operations are carefully monitored to insure that they Conform to the timber sale contract.
4500 The EIS Should contain a thorough discussion of the impacts on water quality and fish habitat	Fisheries are discussed in Chapter 4 of the PEIS The monitoring of streams is discussed in Chapter 5 of the Plan The impacts of a timber sale on a stream are evaluated in the environmental analysis on a project-by-project basis Site-specific requirements are analyzed and appropriate protection is provided
4700 The timber industry has done a lot for the public	This is a Statement of value for Which we have no substantive response
4800 ..the wholesale spraying of herbicides would have a devastating effect on water quality, wildlife and human habitats.	Presently there is a moratorium on herbicide use in Region 5, pending the completion of a Vegetation Management EIS 2,4,5 T is no longer registered for Forest applications We only use herbicides which have been registered for the application intended We carefully select chemicals to best target those plants Which compete with young tree seedlings The chemicals are then carefully applied using EPA and OSHA approved methods Care is taken to minimize over-spray and drift. The normal application rates of herbicides used on forestlands are not likely to produce acutely toxic responses in most nontarget organisms The short persistence. lack of biomagnification in food chains, and the rapid excretion of these

(230)
herbicides by animals preclude chronic exposure and. therefore. chronic toxicity The primary effect of herbicides on wildlife results Prom changes in the plant component of their habitat Only a small portion of the forest would be Sprayed each year Each clearcut acre might get sprayed with herbicides two to three times over its approximate 100-year life span Therefore. 24.750 acres are likely to be sprayed in a decade if the herbicide ban is lifted That is 2.475 acres per year will be sprayed with herbicides This is less than 0 7 percent of the total forest land available for timber harvest See also Y400 in "Herbicides."

4900 I Wish to see the lumber aspects minimized

This is a statement of value for which we have no substantive response.

5000 four wood products companies harvesting timber in the Sequoia National Forest conducted a survey among their vendors to assist the U S Forest Service in gathering social and economic information that relate6 to timber harvesting there is a lack of any definitive data concerning the social and economic impact of forest service decisions regarding the annual volume of timber harvest.

Chapter 4 Section B 1 includes an analysis of both direct and indirect effects on local employment in the various levels of harvest assigned to the Plan alternatives These levels of employment are related to Sequoia National Forest production alone Consequently. the survey results submitted are not comparable to our figures The four mills in the survey reported total employment. not the Share supported by the Sequoia National Forest timber Similarly. the vender survey reports total employment rather than a prorated share The employment analysis in the PEIS does focus on the local geographic area. as the primary loci of effect Appendix O regarding timber supply effects has been added to cover broader level. regional concerns See comment 1000 above

5100 A return to selective cutting is imperative to maintain a diverse & productive forest

A combination of even- and uneven-aged management systems will be used and diversity will be maintained A discussion of the effects of timber harvest on diversity is contained in Chapter 4 Of the FEIS

5110 harmful consequences of timber harvesting ignores the obvious fact that such benefits are transient, while the cumulative effect of habitat destruction is permanent A species such as the spotted owl, goshawk. or pileated woodpecker displayed by clearcutting of mature forest does not share the benefits of new open space

The choice of silvicultural systems to best manage wildlife habitat depends on which species are to be emphasized Almost all forest wildlife species could use a particular young growth stand at some time in its development regardless of the silvicultural System Old-growth habitat is being reserved on the Sequoia National Forest for those species which are dependent on a climax forest For a more detailed discussion an silvicultural Systems, see Appendix G of the EIS

5120 Timber to be cut in the Big Meadow - Buck Rock, Stoney Creek, Chimney Rock, and Baldy Ridge areas should be selectively cut to preserve the beauty of this magnificent recreation area. At least 40 healthy trees per acre should be left for future generations to enjoy

The management of the National Forests is dedicated to multiple-Use Therefore. all suitable timber land is not managed for maximum timber production An interdisciplinary team of Specialists and professional foresters analyze each timber sale to ensure that the sale and associated activities are environmentally sound A landscape architect is Consulted in visually sensitive areas Public participation is solicited in the Environmental Assessment (EA) process Individuals with concerns about particular activities are invited to participate in the EA process

5150 These documents (Plan & DEIS) are very largely inadequate in terms of fully informing the public as to the true consequences of the proposed actions the program does not meet the goals Of NEPA to conserve for future generations natural resource values and environment These need full study (1) The value and unique qualities of old growth forests (2) Cumulative impacts on climate from large scale and successive clearcuts of old growth forests. (3) Lacking is appropriate Valuation for the water resources that unlogged forests provide in terms of long term volume and quality

The documents contain the information required by law. National resource values and environments are conserved for future generations in the forest lands Which were withdrawn from timber activity or which have restrictions imposed on them to protect certain aesthetic or ecological values (1) The value and unique qualities of old growth forests are one reason the Sequoia NF has removed over one-third of its productive forest land from timber harvest and has lowered the intensity of management on an additional one-third (2) There is no danger that the clearcutting on the Sequoia NP will alter the climate Less than two percent of the Forest will be clearcut in the next decade Each clearcut will generally be less than 25 acres. and will be interspersed with older timber stands (3) Appendix B describes the modeling and analysis process used in developing the FEIS The process meets NEPA requirements in evaluating the Water resource BMP's (Best Management Practices) will be used on all clearcuts to protect Water quality on the Forest

5200 A serious flaw is the failure to identify land that is unsuitable for timber management The combination of known erosion hazard information and the lack of quantitative data on soil productivity tends to challenge the adequacy of the timber Suitability analysis The DEIS States that Best Management Practices (BMP's) will be Used to protect such resources This treatment is clearly Inadequate The NEPA requires a "reasoned discussion" on potential impacts

The degree of accuracy of the Sampling procedures and resource data used to allocate land to the various management prescriptions is appropriate as this is a general plan Actual implementation is subject to the Standards and Guidelines in the Plan (Chapter 4) and on-site project environmental analysis which will determine project design. mitigation measures, etc A discussion of environmental consequences is contained in Chapter 4 of the FEIS

5400 Timber would be the primary purpose. but other uses would be permitted when they are compatible The FS should use all of the harvest methods that are available

The management of the National Forests is dedicated to multiple-use Therefore. all suitable timber land is not managed for the maximum timber production Other uses and values are considered Both even- and uneven-aged systems are to be implemented under the Plan

5500 (Manage the forest holistically without disturbing the natural process)	(230) It is impossible to manage the Forest without disturbing natural processes Millions of acres of wilderness have been set aside within the National Forest System to protect these lands from disturbance Yet. even in the wilderness, visitors disturb the natural processes
5600 We Should have 250' stream management zones along Classs I & 11 streams	The mitigating requirements for each project or timber sale are developed on a site-specific basis by Professionals and specialists to protect the land and the life-forms associated with it and to meet legal requirements Also. refer to response #100 under "Fisheries. General" (Subject Code 081)
5700 the Forest management is being handled just fine	These are Statements Of value for which we have no substantive response
5800 The traditional emphasis on timber production is devastating our national forests emphasis should be on the maintenance of an ecologically sound system	At the time a project is planned. specialists evaluate the area and only recommend treatments that will not result in irreversible or irretrievable environmental impacts
5900 We Compliment you on the documents They definitely meet the requirements of NEPA and the National Forest Management Act	The Acts that you mentioned directed the planning process
6000 We support intensively managing those lands where timber production is cost-effective	Our commercial timberlands are managed intensively where there are no conflicts with other uses Where conflicts exist, an interdisciplinary team of professionals and specialists analyze the Situation and present environmentally acceptable alternatives which satisfy the needs of the competing users to varying degrees. The land manager responsible for the decision selects an alternative
6100 We support even-aged management as the principle system in all forest types and over most of the Sequoia NF	These are Statements of value for which We have no substansive response
6200 The Sequoia National Forest contains a remarkably high percentage of late succession habitat No more old-growth forest should be cut until we fully understand the impacts that its removal has on organisms dependent upon this vanishing forest type . We must not destroy the last intact pieces of our climax Sierran Forest There is still much to be learned and we need the genetic and silvicultural information stored in these living laboratories There is enough high-quality second growth forest	Productive timberland is being managed to emphasize uses other than timber on over 50% of the 679.000 acres of productive timber on the Sequoia This includes timber in wilderness. along travel corridors. along streams. on erosive soils. around recreational areas, and in spotted owl habitat areas

6300 The elearcutting system Should also be available and implemented to regenerate pine stands	Both even- and Uneven-aged management Systems will be used in all forest types Clearcutting to regenerate pine will be considered The actual silvicultural prescription will be based on site-Specific conditions and direction contained in the Plan
6301 The rotation of cutting on the Sequoia must be bolstered back Up to 200-300 years so that trees can reach their full size or nearly so	A discussion on the trade-offs between rotation age. timber production and other values is found in Chapter 3, Section E 22 e of the PEIS
6400 We Support the use of a full range and variety of harvest Systems . We Support the principle of integrated pest management	See #6300 above
6500 The Preferred Alternative (Plan) Should retain the highest land base for full yields of timber	The modeling process described in Appendix B of the EIS allows all lands to be available for all uses. within constraints imposed by the theme of each alternative The computer model, PORPLAN, then solves for the particular allocation of resource uses one that produces the maximum present net value under the conditions that pertain to each alternative
6501 The SQP should Support the reasonable requests of the timber industry concerning the amount of timber to be harvested The respondent demands a minimum annual cut of 104 MMBF but would prefer 134 MMBF for the following reasons 1) The timber industry provides economic and social stability for a large populous within the counties affected by the Forest's zone of influence and local communties (Auberry. Dinuba, Inyokern, Porterville, etc) 2) Wilderness expansion would further hamper the timber industry's ability to obtain a sustainable timber yield in the future 3) The increases in foreign imports (especially from Canada). and higher interest rates are harming the timber industry These aspects help increase unemployment. raise the price of housing and lumber products. and cause families relying on the timber industry to suffer economically. 4) Counties receive 25% of the National Forest System revenues that come from timber sales and Other land uses This amounted to 29 million dollars in 1985 received by the counties in Central California benefiting directly from SPP These revenues are used for the betterment of local schools, roads, and government 5) Timber harvesting benefits the land and its resources resulting in a) more land suitable for wildlife and grazing, b) a reduction in fire hazard. c) a means of preventing timber from going to waste through insects, disease. over-maturity and other damaging agents.	The modeling process described in Appendix B Of the FEIS allows all lands to be available for all uses, within constraints imposed by the theme of each alternative, The computer model. PORPLAN. solves for the particular allocation of resource uses one that produces the maximum present net value In this process nonfinancial values, such as wrlderness experience, are evaluated and chosen to the extent that they contribute more to public benefits than do values with a financial return In this method of resource allocation the intent of the 1960 Multiple-Use Sustained-Yield Act is fulfilled Multiple-use is optimized, but few, if any. specific uses are maximized The above response is applicable to points 1-9

d) firewood accessability; e) new road construction, and therefore, more access to recreational activities Such as, hunting, fishing. hiking and camping; f) fuel for the lumber mills eo-generation plants. Which provide energy for 10,000 homes at one mill alone 6) Timber is a renewable resource Through proper management the SQF can provide for the timber industry's demands for timber production and still insure that the multiple-use concept is followed 7) Asthetic values can be maintained. and trees planted to provide for the future. 8) The SQF should not let the lobbying pressure from a small number of people reduce the amount of timber that may be harvested Political pressure combined With voices of hysteria concerning environmental issues have been drowning voices Of reason from the industry 9) Timber ranks as one of the top agricultural products in California, and although 75% of those products are utilized Without leaving the state. many individuals and businesses would suffer across the nation if production is reduced on the SQF

6503 The SPP should support the reasonable request of the timber industry concerning the amount of timber to be harvested Some request the maximum annual cut of 186 MMBF. others support the High Market (MKT) Alternative, for the nine reasons listed in #6501 above

Please see the response given to the Tulare County Board of Supervisors later in this Appendix.

6600 Conservation of timber should be the primary objective Timber management is for the experts but their expertise should not be hampered by politics. short-run economies or special interest groups Our children should have Old Growth trees to fuss over

These are statements of value for Which we have no substantive response

6700 We also desire that a member or members of the Kern Valley Indian community be allowed access to both archaeological information and any known or suspected Sites

The Sequoia NF will continue to consult with Native American peoples regarding their Cultural and religious concerns for all projects Conducted on Forest lands However. we are prohibited by 36CFR69 18 from granting public access to cultural site location information except under very restricted circumstances

6800 (Manage forest resources aggressively to compete in the world market place)

The Forest Service manages Its land under the multiple-use doctrine which demands that all resources be managed for the public benefit This means that intensive timber management is limited to a small percentage of the Forest Instruction to change this direction must come from Congress

6900 False scarcity of timber is one of the main reasons for extremely high bidding. which led to the recent buy-out program,

Historically, high bidding has not occurred on the Sequoia The maximum potential yield given in the Plan represents a volume that could be produced if

we practiced intensive management on all the commercial timberlands on the Forest. This is not possible with all the multiple-use considerations that are a part of forest management The 97 MMBF figure is a realistic yield which can be met

7000 logging prescription for the Piute Mountains needs to be changed to eliminate clear cuts The area is too arid,.

Historically. we have clearcut and successfully regenerated timber stands on the Plutes Proposed timber harvest areas are examined by professional foresters and a variety of specialists Their findings are documented in an Environmental Assessment for public examination We do not clear-cut land that we feel Cannot be successfuly reforested

7100 the 20 employees of Salvage Loggings, Kiper Lumber. and many others don't think the impact is negligible.

We do not mean to Imply that the management practices do not have an influence on these individuals or Others that make their living on the Forest However, socioeconomic effect is estimated for whole spheres of economic Influence. not for individual firms

7200 .Because the Sequoia assumes timber values will dramatically increase in the future. timber is withheld until later decades

The Sequoia does not assume that timber values will dramatically increase in the future The values used are listed in Table B 3 in the Appendix of the FEIS The level of timber produced in the alternatives is primarily determined by multiple-use constraints required In the model The PORPLAN modeling used to develop the BI$ and LMP meets NEPA requirements

7300 .The assumptions about stand growth, discount rates and price trends are the most important determinants of timber sale levels The same tables, rates and trends are used in every alternative This Violates the National Forest Management Act regulations The Budget Constraint on the Preferred Alternative is Not Justified any cost figures in the plan are highly suspect

Originally the budget constraint of 20% over CUR was imposed because in our judgement we had to constrain the FORPLAN model to stay within what at that time appeared to be a reasonable budgetary range The 20% figure was Judged to be reasonable and is in use region-wide The Preferred Alternative is "constrained" to Stay below $30 million. a constraint which from a practical standpoint exerts no influence on the model because it is so high The range of alternatives presented in the FEIS does represent different ways of dealing With pbulic issues and does in fact reflect resource potentials. both market and nonmarket Hence, we feel we have responded properly to NFMA requirements Regarding basic assumptions about Stand growth. discount rates, and price it is not, in our opinion. appropriate to vary those assumptions Just for the sake of varying them Growth rates are based on stand data Price trends were based on over 20 years of data and our best judgment as to what might happen in the future Thus. we have no sound basis for varying any of these three assumptions

7400 The Sequoia plan fails to identify the resource use and development opportunities as required by 36 CPR 219-12(b) .	36 CFR 219-12(b) is a regulation dealing with the evaluation and use of Public input received during the planning process Regarding identification of resource use and development opportunities it reads "The Forest Supervisor shall determine the major public issues, management concerns. and resource use and development opportunities to be addressed in the planning process " The Forest Supervisor did in fact do this using public input as advice Therefore. we judge that our planning process and documents conform to 36 CPR 219-12 (b)
7450 There is a 40 MMBF gap of unexplored decision space that the Forest Service has not considered	It is our judgment that no balanced alternatives exist in this 40 MMBF "gap " At levels of harvest above the 133 MMBF level Of PRO. management of the Sequoia Would be so skewed toward timber production that the concept of multiple-use management would be severely constrained
7500 The final EIS Should run the preferred alternative through the Forplan computer with and Without herbicides	The herbicide issue will be resolved with the final decision on the Vegetation Management for Reforestation EIS which may take some time All Forest Plan alternatives in the FEIS are based on the use of herbicides continuing to be available Estimates of reduced timber yields and higher vegetation management costs Without use of herbicides are also described in the Forest FEIS. Section E 2 f of Chapter 2
7600 The Sequoia has violated NEPA by not including alternatives for MMR's and MIR's The Sequoia has effectively shielded one-fifth of the Suitable lands from NEPA review .	Please see Chapter 2, sections C and E for an explanation of how MMR's and MIR's are used in alternative development Just because MMR's and MIR's are constraints does not mean they have been "Shielded from NEPA review " They are explicitly set out in Chapter 2 of the FEIS
1620 Need to evaluate a visual quality constraint imposed on 17,000 acres along state scenic highways	Regarding scenic or eligible scenic highways. it is our policy to manage these as Sensitivity Level 1 (foreground Retention) Which means that the existing character of the landscape will not be evident by any land management activity Hence, the constraints designed to retain visual quality along these highways is consistent with present policy
7700 we want to renew a plea to display the cost of individual MMRs in terms of timber Output	The MMR's and MIR's together cause a loss of 1.219 MMBF over the 50-year planning period or 24 4 MMBF on an average annual basis
7800 continue emphasizing the importance of recycling our used paper products. in order to help save 25% of our wood products	The Sequoia does not sell any of Its wood to pulp mills Therefore. conserving paper through recycling Would not reduce the timber cut on the Sequoia

7850 It appears that there's probably 2-4 times the amount of acreage set aside for the spatted owl, which is **above** the minimum requirements	Please **see** the revised explanation of the management of this species under the Management Indicator Species Section of Chapter *3* of the FEIS and Plan
7900 .The NF's were orlginally created with the management emphasis on timber and water	Thank you for **your** comment
8000 Ensure all timber activities **minimize** conflicts With existing wildlife. .	The interdisciplinary environmental analysis performed during project planning identifies mitigation to protect wildlife and other values The Environmental Assessment highlights any predictable environmental impacts that will **occur** If the impacts **are** significant. they must be documented in ***an*** EIS Also, refer to **response** #200 under "Other Wildlife species."
8100 the combination of the **various** multiple **use** outputs into the ten alternatives was decidedly biased towards the two extremes and the do-nothing (CUR) alternative	We disagree Examination of Table 2 *22* shows that outputs are not biased toward the extremes. but rather that they cover the entire spectrum.
8150 No alternative exists which proposes moderately increasing timber production, reduced **new** ski **areas.** moderate Water recreational uses, non-increasing range usage, and increasing wildlife habitat	While **it** is true that not one of **our** alternatives matches the One you outline. the WFV Alternative comes close However, instead of a moderate increase in timber production it Shows **a** moderate decrease, from 97 MMBF to 82 MMBP
8200. the FS **is** yielding to big spending commercial timber interests	**See** Response #300
8300 Management direction says. ''There will be **more** evidence of landslides **more** evidence of erosion this violated NPMA, Section *6(g)(2)(E),*	Projects are planned and executed to minimize erosion and other adverse environmental impacts **Some** massive land movement will occur regardless of management practices The items mentioned are not irreversible Small landslides and Sites of erosion from OHV can be repaired
8500 "Management **problems"** need **to** be defined CP 7 - Timber #1 should **also** include heavy **use recreation areas in** areas With modified harvest It appears that considerable effort has been made to play down timber impacts Combining the PRF and **CUR** alternatives **causes** confusion p 4-99 indicates "both alternatives will utilize about 300.000 *acres* for timber" p 4-100 indicates "most of the land used for tmber management is in regulation class I & II These statements are true but do not address **. a major** shift .from regulaton class **II** Where timber production is contrained to regulation class **I** where timber production is unconstrained	"Management problems" is a subjective statement It includes anything that Would give the land manager **concern** CF7 **is** not compatible with heavy **use** recreation No attempt was made to "play down" timber activities The PRF and CUR Alternatives were combined **in** the discussion to compare the Selected alternative with our present program Table *4 33.* FEIS, clearly shows the acreages that **are** being managed in each Regulation Class Regulation Class **I** does not mean that harvest is unconstrained Approved and environmentally sound timber management practices **are** still required in all Regulation **Classes**
8600.. Budget **cuts** and declining personnel should not adversely affect our forest lands and	Regardless of budget constraints we **are** required to conduct environmental analyses **for** each project.

wildlife..	(230) Wildlife Biologists evaluate the projects in order to ensure that sufficient quality habitat is provided for the affected wildlife Refer to response 100 under "Other Wildlife Species " Also, refer to Appendix L for a detailed discussion of the budget process
8700 (Past timber management practices need to be improved Don't let budgets or politics interfere with good forestry)	These are statements of value for which we have no substantive response Also, refer to response 18600
8800 I don't believe that a management plan is necessary	Chapter 1, section A of the FEIS, describes the purpose and need for Forest Plan
8900 . The principal silvicultural system used Should be chosen on a site specific. rather than forest wide. basis Regardless of the cutting method applied. the existing species composition should be maintained following timber harvests	Silvicultural Systems and timber cutting methods are chosen through the interdisciplinary process on a stand basis for each timber sale The Forest Plan and DEIS are general planning documents To model alternative scenarios on a forest-wide basis. general silvicultural systems and cutting methods are applied to each analysis area on the basis of general Compatibility with the site and objectives described in the alternative scenarios A mix of cutting methods will normally be used on the project level in actual practice to be compatible with site-specific conditions and objectives Natural species composition will be generally maintained through the reforestation program (see FEIS, Chapter 4, "Timber", Regeneration Method)
9000 Intensive management of young-growth Giant Sequoia will be beneficial in perpetuating the species	This aspect of giant sequoia management is stressed in the Plan. Chapter 4, "Giant Sequoias "
9100 With a few exceptions. current management of the Forest has been satisfactory and it is a known system	This is a statement of value for Which we have no substantive response
9200 the Forest's personal-use firewood program is super The personal-use demand for firewood should receive preference over commercial firewood sales	While this activity does not return the revenue to cover costs. it does produce considerable benefits to the public Individual Ranger Districts employ personal use and commercial fuelwood sales as management tools as well as a means to satisfy demand Personal use and commercial demands will be met in most eases Preference of personal use or commercial will be given on the basis of area and circumstance situations on the district level. not as a general forest policy Forest direction is is to satisfy both demands whenever possible and reasonable

9300 Sale offerings are held artificially low in the Preferred Alternative and Should be raised to more closely approximate current demand Wildlife habitat needs are met and minimums are exceeded Habitat is provided for **105** pairs of Goshawks in decade one-400% above the 21 required by MMR Habitat is also provided for 130 pairs of Spotted Ow18 in decade one-almost 300% above MMR Also streamside management zones are extended to include intermittent streams to increase the amount of land available to meet riparian resource needs While all these needs are being met end exceeded the need for timber is being short-changed	Timber bale offerings in any alternative are functions of the alternative Scenario and are not held at any "artificial" level. Timber harvest levels within each alternative scenario are constrained by economic efficiency (present net value) The Market Alternative. for example. is more heavily concerned with meeting timber demand. The Preferred Alternative displays the Forest's best (optimum) mix of all resource outputs at economic-ally efficient levels Timber demand is not being short-changed by the Preferred Alternative Also. See Chapaters 3 and 4 of the Final Plan and Appendix B of the FEIS for expanded explanation of goshawks and Spotted ow1 management The figures in your comment represent the amount of suitable habitat currently available for these species The amount of habitat actually managed and protected will be less
9400 The general nature of the Plan is recognized however. does this mean that the adopted alternative calling for x number of acres for timber harvest and x% trails open to OHV use preclude public participation in an EIS process in specific areas of implementation?	Public participation is invited (and Solicited by policy) at all levels of planning Interested parties will be notified of pending project level planning by requesting their names be added to Forest Supervisor and District Ranger public involvement mailing lists
9500 National Forest receipts in lieu of taxes may seem proportionately insignificant to the Plan authors but county government and school officials would be hard-pressed to budget replacement income	The significance of receipts in lieu of taxes income to County governments is recognized (See FEIS. Chapter 3, D Economic Base. Forest Reserve Funds. for each county)
9600 Less subjective and more concise accurate descriptions of the difference between alternatives in the DEIS would have been helpful to reviewers in determining their own preferences	Please refer to the summery tables at the end of Chapter **2** of the DEIS Tables **2** 21, **2** 22. 2 25 *are* of particular assistance in concisely identifying differences among alternatives
9700 The outer reaches of preservation were thoroughly explored but plan Scenarios which would have coordinated and harmonized optimum outputs of the various multiple uses were ignored in this planning exercise	It is our opinion that the existing range Of alternative?, "coordinates and harmonizes'' various appropriate mixes of market and nonmarket outputs No single output is maximized In our view the optimum mix - that is, best combination of market and nonmarket outputs - is embodied in the Preferred Alternative (PRF) Note that "optimum" means "best" while "maximum" means "most" or "greatest " PRF represents the best mix, but not maximum commod- ity Output Detailed planning records are available for public inspection at the Forest Supervisor's Office

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9800 Issues and concerns raised on the Sequoia Forest during the planning process can only be responsive to the extent that they are not in derogation of the body of law which authorized Forest Service planning	We have no Substantive response to this observation
9900 Of particular concern to us is the manner in which MMR's were imposed upon every alternative The cost of these constraints is not evident from the Plan documents except for an unqualified restriction of 79.000 acres of the total suitable forest land base You have not followed NEPA and NFMA procedures until these costs are made visible and are clearly demonstrated as being justifiable in each alternative	Please refer to response #7700 above
9901 We oppose 91 46 thousand acres being sent to other resource uses, particularly 15 6 thousand to trmber harvesting, and 19 36 thousand to range	This is a statement of value for which we have no substantive response
9991 I/We oppose the proposed timber harvest in the Cannell Meadow Ranger District because 1 It does not protect against soil erosion on already poor soil types With dry climates 2 It doubles the timber harvest 3 It should require a separate Environmental Impact statement because of the plans magnitude 4 Demands for other resources and environmental concerns are so great on the Kern Plateau	1 The Forest Service is prohibited by law from producing "substantial and permanent impairment of the productivity of the land" (NFMA. 1976) Guidelines that ensure the maintenance of soil productivity will be followed regardless of activities carried out on the lend 2-4 The modeling process described in Appendix B of the FElS allows all lands to be available for all uses. within constraints imposed by the theme of each alternative The computer model. FORPLAN. then solves for the particular allocation of resource uses that produces the maximum present net value In this process nonfinancial values. such as wilderness experience, are evaluated and chosen to the extent that they contribute more to public benefits than to values with a financial return In this method of resource allocation the intent of the 1960 Multiple-Use Sustained-Yield Act is fulfilled Multiple-use is optimized. but few if any specific uses are maximized

SILVICULTURAL METHODS (231)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 I object to the use of clearcutting when It is in the vicinity of riparian areas and wilderness areas.	It is the Forest Service policy to protect riparian and wilderness areas from disturbances which will result in irreversible or irretrievable damage

200 The fact that soil productivity is decreasing on much of the private land in the US should make the Forest Service extra careful in preserving Public soils

The Porest Service is prohibited by *law* from producing "substantial and permanent impairment of the productivity of the land" (NPMA. 1976) Guidelines within this Plan are designed to provide a comprehensive approach to incorporating soil productivity into land management decisions through soil resource inventory. soil management support service, soil quality monitoring. soil Interpretation. and soils information training

300 Can the 5% of each Compartment set aside for Cavity and Snag using wildlife be Outside the conifer zone? .

The portion of each compartment reserved for snags will be designed for use by the appropriate wildlife species present Therefore, the tree species may be other than conifers

400 "Maintain at least 20 sq ft /ac basal area of black Oak where it Currently exists " How do you propose to do this?

With the exception of cable regeneration units, oaks will be protected or managed to maintain at least 20 square ft/acre basal area where it currently exists This will require pre- and post- project monitoring of hardwood basal area to insure compliance with this standard

500 The Management Emphasis Map Shows a large portion of the Piutes is not proposed for intensive timber management. Are the Jawbone and Woolstalf Compartments in the mixed conifer type? Should elearcutting be done in these areas?

The Statement that restricts timber production to the mixed conifer type only was intended to mean that we will avoid the marginal desert conditions found at lower elevations in portions of the Piute Mountains We do not intend to avoid timber management on sites that are clearly suited for that purpose from an ecological point of view The suitable sites may include some eastside pine type

600 Pg. 4-77 Fish & Wildlife Is the 10% figure in Conflict with the 5% used in Snag and Down Log Management on pg 4-27

The Statement *an* page 4-77 of the Draft Plan should have read "Managed at least 5% ", not 10% The Final Plan has been corrected

700 Starting with the 5 decade. 5200 acres will be clearcut (pg 4-14) How does the Forest Service propose to maintain 50% of the area on a 120-140 year rotation7

The 2132 acres shown as reforestation in decade 2 of the Draft Plan (page 4-14) include 2.000 acres of elearcutting The remainder is a harvest designed to provide seed tree6 on areas where a two-Step shelterwood prescription was initiated in the previous decade 1978 acres will be clearcut and regenerated annually during the 5th decade

800 Pg 4-10 Timber By the year 2030 about 135.000 acres will have been clearcut Also. 188,000 acres will be "relatively unchanged " This is 323,000 acres According to Table C4 2, pg, C-21, the total suitable forest land is 289.000 acres Does the Forest Service propose to manage for timber 34.000 acres of unsuitable lands'

The 345.000 acres of "relatively unchanged" timbered land referred to on page 4-10 of the Draft Plan is the sum of regulated acres in the Preferred Alternative and includes those acres that are in the regulated component but not yet selected for harvest by the year 2030 There is a total of 420.000 acres of timbered land tentatively suitable for harvest. of Which 345.000 was available for timber management in the Preferred Alternative with 20% of that receiving uneven-aged treatment

900 an exposed snowpack melts much more quickly, thus, water is available for tree growth and reproduction for a shorter period in the spring The availability of water is a major factor limiting tree growth on SQF	The only water available to plants. except for very minor summer rain. is what is stored in the soil profile within the rooting depth of approximately two to four feet Regardless of the timber harvest method. this depth of soil is normally saturated with water at the onset of the spring growing season In areas of heavy snowfall it has been shown that snow accumulating in clearcut Openings yields more water because of less evaporation during the winter and a dense pack melts more slowly in the spring, thus prolonging the runoff period
1000 The Region has concluded that if clear-cutting is proven to be the most economically-efficient silvicultural system. then it is "Optimum" and NFMA is satisfied This is incorrect	Each alternative was modeled using FORPLAN All applicable constraints were included for each alter-native FORPLAN then selected the harvest method most economical in terms of costs and benefits that would meet the prescribed Constraints A relatively high proportion of elearcutting was identified by FORPLAN as part of the optimum Solution However, a significant amount of timber will come from harvests other than elearcutting
1100 There is no valid reason for estimating typical Stand size The enlargement of natural stand sizes is apparently an attempt to justify the Forest Service bias towards large opening clear-cutting ,	We do not mean to imply that managed stands are intended to correlate with natural stands Within the capabilities of the ecosystem to respond. managed stand boundaries are determined by manage-ment objectives and practical logistics In defining Stand boundaries consideration is given to tree and low vegetation plant physiology. fire management. soil productivity and a host of other ecological concerns, in addition to the purely physical aspects Of forest management such as road construction and logging methods Clearcut Stands on the Sequoia NF have averaged less than 20 acres in size in the past No material change in size is anticipated in the future
1200 Maintaining good vigor can be very difficult under even-aged management Systems	Regardless of the silvicultural system used. the vigor of Individual trees is only assured through intensive management efforts
1300 It has not been demonstrated that the even-aged systems provide more useable livestock forage than uneven-aged	Before clearcutting was a significant part of the timber harvest on the Sequoia NP. meadow utilization by domestic livestock was considerably higher than it is today This indicates that grazing animals are taking advantage of the transitory forage pro-duce in even-aged plantations Ai long as more plantations are created each year there will continue to be transitory forage available. even though older plantations have ceased to be of valuc

1400 Native wildlife species were thriving in California forests . before the first forester wrote the first silviculture prescription	Timber harvest prescriptions are designed to be consistent With management objectives for wildlife However. there is no intention to maintain wildlife populations in their pristine State The decision on how to manage wildlife habitat is an integral part of the decision on how to manage timber
1500 Many areas have to be planted more than once because of poor Seedling survival	As with any agricultural crop, some mortality of planted trees is expected as is an occasional failure of an entire plantation Our experience with artificial regeneration shows that technology is available to keep such failures well within tolerable limits as defined by minimum timber growth goals
1600 I would like to see a more intensified educational effort directed to the public about reforestation	Forest-wide Standards and Guidelines of the Plan provide for educational and user services Appendix A of the Plan refers to an Interpretive Services Plan This Plan includes interpretation of timber management activities
1700 I plant for private enterprise on forest lands Their reforestation costs are at the maximum $150 per acre Your costs approach 51.200 per acre	The goals of intensive forest management are reflected in what appear to De high reforestation costs. These costs are justified on the basis of the financial return that they will produce in the future Our costs include a number of silviculture treatments in addition to simply planting trees These treatments are designed to ensure good early growth and future stocking in regenerated timber stands.
1800 Overstory removal was not included as a silvicultural prescription	We intend to use removal Cutting as a shelterwood method where appropriate It is applicable When an adequate number of seedlings become established after a shelterwood seed out, and when natural events have created a similar condition
1900 Logging companies should be required to post a performance bond A three year guarantee regarding satisfactory growth of new Seedlings should be required	Timber sale contracts currently require a performance bond to be posted by the purchaser These bonds do not cover post sale activities because this is beyond the requirements of present regulations and law
2100 In our opinion. a bill Should be passed to allow the U S Forest Service to be able to keep a certain Percentage of revenue that they receive	The Forest Service is currently Using existing legislation to collect funds from various users and utilize these moneys in the respective programs
2300 The Plan is unacceptably vague as to what exact silvicultural methods it will use to harvest timber .	The amount and method of harvest for any particular area will be determined through individual project environmental analysis This PEIS is not intended to be site-specific

2400 Herbicides Should be limited to non-phenoxy, non-toxic

The decision Of what. if any. herbicides will be used will be made in a Separate Environmental Impact statement.

2500 It is difficult to believe there are zero acres unsuitable because of irreversible resource damage

The process for selecting lands suitable for timber management is described in the Forest Plan. Appendix C. Determination of Land Suitability

3601 DO NOT CLEARCUT (CC) BECAUSE
- FS plans to destroy 2000 ac/yr with its CC program
- timber sales are uneconomical and CC is less so
- small diameter trees are wasted in CC
- we should not CC marginal sites
- the SQF is too Steep and arid to intensely manage
- there are insufficient funds and technology to replant and maintain plantations
- many cases of plantation failures (especially in red fir) - falsified records make plantations look better
- CC is detrimental to the forest
- there is no conclusive evidence that Cc is sustainable in long run
- nutrient removal from the soil
- deminished site productivity
- fire hazard increased in the future when canopies close
- fire ecology is destroyed
- microsites are destroyed
- erosion is increased with removal of all litter
- monoculture increases hazard of insects and disease
- fisheries are degraded with reduced thermal cover and increased siltation
- non-game wildlife habitat is diminished (incl gophers. porkies. etc)
- non-timber vegetatin is not replanted
- it makes herbicides necessary
- it reduces recreational opportunitites
- campgrounds and picnic areas are needed mare
- visual quality is reduced
- we want visual quality and a relaxed situation in the forest
- it will remove all the trees
- selective cutting is better
- non-timber species are not replanted
- selective cutting is better
- "on-timber species are not replanted

Appendix G of the FElS discloses the complete state-of-the-art knowledge. in condensed form, on even-aged and uneven-aged systems of timber management The even-aged system includes clearcutting where appropriate We have not ruled out the application of uneven-aged management We do intend to practice uneven-aged management in areas where management objectives make it desirable to create small. dispersed openings. or where it is desirable to maintain continuous tree cover The environmental consequences of the proposed action as well as all other alternatives is included in Chapter 4 of the PEIS

3605 . The most scientifically conservative positions on clearcutting have held that much of It was done in inappropriate areas

The scientific community has historically accepted clearcutting as a viable silvicultural system Most clearcuts on the Sequoia National Forest have been successfully regenerated Appendix G of the FEIS summarizes. with references. the complete state-of-

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	the-art knowledge on even-aged and uneven-aged systems of timber management.
3650 Forest inventory is the all important first step in setting harvest levels If the inventory is overestimated, more acres must be harvested to sustain a particular level of outputs Specific problems with the inventory include Use of out-dated aerial photos for baseline timber typing, widescale summing of timber types (Table C3 1, C3 2) accidental bias of sample tree measurement and extreme variability .	The volume estimates used In the Forest Plan have been checked and verified using District volume estimates based on District inventories It is true that some timber strata were combined in the analysis We feel that the accuracy is sufficient for Forest planning purposes We will be monitoring volume If discrepancies are noted, adjustments will be made
3660 The appendix (G) reflects a bias for even-aged management. particularly clearcutting, as the dominant harvest method on our NF's Apparently a conclusion has been made that since elearcutting is the most administratively efficient harvest method. it is therefore the most "optimum" method as well The NPMA is not satisfied by a determination that ignores physical and biological factors .	Appendix G objectively reviews the silvicultural methods used on the Sequoia by considering physical and biological factors as well as administrative factors Silvicultural prescriptions are made on a site-by-site basis using the interdisciplinary process The NFMA is thereby satisfied

BELOW COSTS SALES (232)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Let the timber companies absorb the Cost of their logging roads Better still stop the sale of timber completely and put the $1 7 mil to use attracting more visitors and creating a more complete use of the park Leave all cutting to persons employed by the National Park and only for the purpose of Scenic appeal.	The Sequoia National Forest is not a park and works Under legal direction to produce goods and services to the public Timber purchasers do absorb the cost of roads, either in the price they pay for stumpage, or in the case of deficit sales, by building roads at their own expense The Forest Service does not use its OWn employees to harvest timber because It would require huge investments in skills and equipment tnat are readily available in the private sector
200 What is the net profit on timber sale in SNF? I have read that there is a net loss On timber harvest If so. why is such a practice pursued with such heavy emphasis in the Preferred Alternative? Even in the AMN. WLV, and LBU Alternatives? If this net loss is the case, this amounts to subsidizing certain industries at a tremendous cost to the public and to the environment	The Forest Service is mandated by law to manage the National Forests for multiple-use As a consequence the timber program. as well as all other National forest programs. must be evaluated in terms of Costs versus all public benefits Revenue earned from the sale of timber is just one of these benefits congress did not intend that the National Forests be managed in a manner that would ensure that revenues exceed Costs However, if permanent roads are considered an investment, the sales program is not below cost Certain types Of sales, including fuelwood use. generate negative revenue, but considerable public benefits are realized Also. while reforestation is considered a Cost, one must also consider that such investments provide forest products to future generations

TIMBER VALUES IN UNROADED AREAS (235)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 , . Concerns are (CAS) land base. .. proposes to utilize 190,000 acres . . for timber production this is a mistake by 2030 demand for wood products will exceed supplies by 7%	The process for Selecting lands suitable for timber management is described in the Forest Plan. Appendix C. Determination of Land Suitability

VEGETATIVE TYPES. GENERAL (260)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Mountain meadows Should be managed for one of the following resources wildlife. fisheries, recreation. educational purposes, visual quality. or grazing	Mountain meadows *are* managed under the multiple-use concept with emphasis on maintaining the meadows and water quality The Forest is presently developing meadow management Standards and guidelines Acceptable activities in and around meadows will be identified at the project level The activities will be evaluated and monitored based on the Standards and guidelines
200 Mountain meadow standards and guidelines need to protect meadows for end include needs of wildlife. recreation. fisheries. grazing and visual concerns	The Sequoia National Forest is presently developing standards and guidelines for mountain meadows The goal is to maintain or improve meadows. the existing meadow acreage and their associated productivity Acceptable activities in and around meadows will be Identified. evaluated and monitored
310 Grazing Should be eliminated from mountain meadows	Elimination of grazing is outside the authority of this Plan. Mountain meadows are managed for multiple-use with emphasis on maintaining and improving meadows and water quality Grazing is allowed where the meadows or water quality will not be significantly affected
320 Meadows should have cattle enclosures for comparative Studies on effects on wildlife	Pacific Southwest Forest and Range Experiment Station is presently involved in such research The Forest Service uses research from experiment stations in its management as it becomes available
400 Nature should be allowed to take Its course in meadows Don't stop encroachment	Meadows are a very productive and valuable part of the forest ecosystem Presently. meadows represent less than 2% of the conifer ecosystem Loss of meadows to encroachment would be a loss of wildlife habitat. recreational Opportunities. and livestock forage
500 Meadow restoration funding should be doubled	Meadow restoration funding is prioritized through the watershed improvement needs inventory Congress allocates watershed improvement funds
510 Meadow restoration should treat the source of the problem and treatment should be the responsibility of the person causing the damage	The Forest Service inventories riparian and meadow areas that are in need of improvement (watershed improvement program) Watershed restoration funds

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are Used to treat erosion that occurs or has occurred downstream from the source The source, if originating Prom roads or trails. would be repaired through Porest Roads and Trails fund. If Sites needing restoration are within areas Used for intensive ongoing resource management activities. the activity causing the impact bears the expense of restoration Often times a source Of erosion cannot be attributed to one activity or it is a natural process It is often a cumulative effect over time and throughout a watershed Best Management Practices identified in "Water Quality Management for National Forest System Lands." cumulative Watershed impact analysis, and the Meadow Management Standards and Guidelines are used to identify acceptable activities and mitigation to prevent future erosion problems

600 Meadows under 2 acres in size need to be managed

The Final Plan has been updated to include meadows under 2 acres in the Riparian areas As projects occur in and around these areas, riparian standards and guidelines will be applied

CHAPARRAL (261)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Prescribed burning in chaparral is said to benefit Water yield and is recommended for 10 to 20 year cycles or less for "resource protection" (whatever that means) Is this statement supported by tong term studies by experts-	What "that" means is water yield could be enhanced by more frequent burning. but due to the potential for increased erosion from frequent disturbance. we recommend a longer cyle between treatments Numerous studies exist and are available upon request to provide detailed information on the effects of chaparral burning bath in general and specifically on water yield enhancement
200 What studies have been made of the SQF chaparral areas in terms of diversity and unusual or rare plant communities on a 12 month basis? This program is inadequately studied Prescribed burning may well be beneficial but you haven't the data to Support this.	James Shevock, former Forest Botanist. Conducted extensive surveys of most ecosystems and seral stages found within the Sequoia National Forest Numerous other botanists, including Twisselmann. have surveyed parts of the Forest Locations of rare, threatened. or sensitive plants have been identified and will be protected as will unusual plant communities identified in the Botanical Areas No sensitive plants are known from the Chaparral area of the Sequoia The effects of chaparral burning on vegetation and species diversity is well documented
300 Conversion of chaparral to grass will negatively impact wildlife if not done properly	The Forest Service and cooperating agencies such as the California Department of Fish and Game have been prescribed burning in chaparral for many years We are aware of the effects of burning and type

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conversion of chaparral One of the primary reasons for this program is the enhancement of wildlife habitat Appropriate guidelines have been developed to meet this need

400 Management of chaparral should include greater acreage each year

The recommended chaparral program reflects a balanced program of what we think we can do within the limitations Of the available workforce. funding and Other resource conflicts The intent is to provide a balanced diversity of age classes, special areas of fuel reduction for fire protection. enhanced wildlife habitat, forage production for grazing, and enhanced recreation access.

500 The chaparral management program is very important Fire is an important part of resource management Fire should be allowed to burn in all wildernesses unless the fire threatens high value "on-wilderness areas Mechanized equipment and aircraft should not be used in wildernesses

Thank you for your Comment5 We agree that fire IS a very important part of resource management In general. the direction in the Plan concurs with your suggestions, although there are times when It is in the best Interests of the public and human Safety to use mechanical equipment or aircraft in the wildernesses

VISUAL RESOURCES. GENERAL (270)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---

100 The visual quality objectives should not he compromised They are especially important to retain along the margins of all major roads. trails, campgrounds and other areas of heavy public use either from s distant view or a closer vantage point it should not be sacrificed

101 Leaving a Strip of trees along a road or trail in an attempt to mask a clearcut is a form of management visitors can do without Our concept of visual quality is the entire visual experience We do not go to the forest to view human activity at any distance

---FOREST SERVICE RESOLUTION---

Visual Quality Objectives (VQO's) are developed by. first, using the Forest Service Visual Management System and. second. evaluating the trade-offs With other resource values The evaluation has occurred in this Environmental Impact Statement through the alternatives analyzed Consideration was given to views from all major roads, trails. campgrounds and other areas of heavy public use The Preferred Alternative assures the dominance of the naturally appearing landscape along the margins of these areas by assigning Retention (R) or Partial Retention (PR) Visual Quality Objectives Distant views. greater than five miles. generally allow greater alterations of the landscape without compromising scenic values

The management of the National Forest is based upon the Multiple-Use Sustained-Yield Act of 1960 that states in part that the Forest "shall be administered for outdoor recreation. range, timber. watershed and wildlife and fish purposes *' Forest Administrators are, therefore. Obligated to the American public to manage the land for these multiple uses Outside classified wilderness. activities may be seen and. in some cases, dominate the view Intense management practices will. however. occur primarily in the lesser seen and more distant views The Porest is committed to maintain a quality scenic

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experience along major roads and trails. from major Campgrounds and other areas of heavy public use Also see comment 100 above

103 The Vision Statement section of Chapter 1 should be changed as follows Improve the overall natural appearance along heavily traveled routes through the Forest

We use "maintain" rather than "improve" because we believe our heavily traveled routes now offer a travel experience with a natural appearance and will continue into the future. Activities will occur and will be seen. however. the naturally appearing landscape will dominate overall Also, see 100 above

110 No decline in the visual resource Should be allowed and that every effort should be made to enhance and improve the current value of the VQI

The visual resources Section of Chapter 4, FEIS explains Why the VQI declines under all alternatives Please refer to that section and comment 302 below.

What are the costs and effects of providing the public With the same or better visual quality forest as they currently enjoy?

Costs and effects are evaluated through the range of alternatives Chapter 4, FEIS. discusses the con- Sequences of each alternative Table 2 22 in Chapter 2, PEIS, compares ranges of Outputs for each alternative Table 2 29 in Chapter 2, PEIS compares the economic effects of each alternative

111 Your proposed 14Y decline in the Visual Quality of the Sequoia NF is unacceptable to this group We want assurance that our children and grandchildren and stand on top of Sherman Pass on the Kern Plateau. look east toward the desert. and see a real forest with some old growth timber. not Just a tree farm On the Kern Plateau. where tlmber harvesting activities will increase by 100% in the next ten year period. the decline in Visual Quality and resulting alteration of the forest environment will be much greater than forest wide averages The tlmber harvest increase in the Cannell Meadow District represents a significant change in comparison to other areas in the Forest Plan that should be discussed on a separate impact statement

In the Final Plan, the Visual Quality Index (VQI) is greater than that for the Initial Visual Quality Objectives (IVQO's) Forest-wide This suggests the change in visual quality is well within acceptable limits Many areas of the Kern Plateau will be treated to maintain natural appearing landscapes Viewsheds from Monache Meadows. the Sherman Pass Overlook, and the Salmon Creek-Blg Meadows area are examples as well as foreground views from the Sherman Pass Road and the Blackrock Mountain Road One of the intentions of these systems is to insure a Variety of tree sizes remains We feel this FEIS adequately addresses the changes in the Forest. and another impact statement is unnecessary.

112 I especially enjoy the Kern Plateau and would like to see any management activities conducted there to be performed in such a way as to maintain the natural visual appearance of the forest In accordance With the visual quality objectives listed in the DEIS, I favor retention and partial retention for the Plateau because they seem to favor conserving the natural appearance

The Preferred Alternative has assigned Retention and Partial Retention Vlsual Quality Objectives along the heavier used travel and viewsheds of the Kern Plateau

113 I looked on my way to school at Maggie and Moses, Homer's Nose Those were an inspiration far me and always drew me back to the Sierra If you walk that same route today. you are lucky if you can

We have no technical response to this statement of opinion You Should note that this plan is for a 10-15 year period The FEIS analysis is over a 50-year period

see those mountains It doesn't take a research scientist or a forester to recognize the changes in the valley and the foothill environment and forest I have lived here less than 50 years, the length that you proposed your plan to last b the major values and things that matter in this valley, their health have dropped. forest. air, and water quality are all obivously dropping The forest has declined, the wildlife in the forest has declined

120 The FS has developed the Visual Quality Index (VQI) as a means of evaluating visual resources on NF lands The existing VQI for SQF is 76 6 (DEIS pg 4-106) The FS predicts that the VQI will decline to 66 2 as a result of the management practices proposed in the PRF Alter Mathematically this is a decrease of what appears to be only 14% However. this figure is highly misleading The FS estimates that if the entirety of SQF lands Outside of wilderness is managed using the maximum modification (MM) Visual Quality Objective. the VQI of the Forest will remain at a relatively high 50 0 Thus. the FE is actually proposing a drastic decline in visual quality. aprox. halfway between what Currently exists and what would be a totally unacceptable level of visual impairment

We have recognized an error in our original calculations and have adjusted accordingly see the visual resources section Of Chapter 4, FEIS, for the revisions and a discussion on the VQI decline Note. also, that "a totally unacceptable level of visual impairment* equates to visual condition Class VI This level is not a planned occurrence If this happened. it would drop the VQI below the 50.0 value set as the bottom level

200 The patronizing vocabulary in the definition of maximum modification angers those of us who have Spent many hours trying to make sense of the FS Plan 367,000 total conifer acres are suitable for timber production (pg 3-41, Plan) Then it states that the remainder of the forested land will meet either M or MM VQO's when timber harvest is emphasized (pg 4-22, Plan) Does this mean that all this acreage will meet M or MM VQO?

The 367,000 conifer acres referenced in the Draft Plan are those identified as tentatively suitable for timber production (see Table 3 23 of the FEIS) The glossary in the FEIS contains a complete definition of "tentatively suitable lands " Appendix C of the Final Plan describes how land is evaluated for suitability for timber management Page 4-22. Draft Plan. is a Froest-wide Standard and Guideline It says all conifer acres found suitable for timber harvest. given a cF7 Management Prescription, and outside the Retention and Partial Retention zones mentioned an that same page wlll be managed for M or MM Refer to the Forest-wide Standards and Guidelines in the Final Plan for the changes to this section

230 We feel that the degradation of visual quality caused by emphasis on logging and road construction on the National Forest is the one issue that has angered the public nation-wide, thereby resulting in the confrontation between the Forest Service and the public

It is true that some logging practices created a nationwide confrontation between the Forest Service and the public The Visual Management System and the recognition that the visual resource Should receive equal analysis with Other resources resulted The National Forest Management Act Of 1976 was also enacted after the Confrontations The Act established rules that directly affect visual quality by setting specific requirements for forest service activities that reduce visual impacts

300 The attitude of the stewards of our publie lands (FS) that our forests must be "regulated and managed" is Just not acceptable We are not willing to invest our taxes to convert our wild lands into neatly rowed tree plantations. depriving our wildlife of their habitat

Spare us the vandalism of improvement Observing wildlife in their natural surroundings is most assuredly an experience in visual quality and this is not possible when their habitat has been destroyed and then replaced with rows of even aged timber

The Multiple-Use Sustained-Yield Act of 1960 states in Part. "It is the policy of the Congress that the National Forests are established and shall be administered for Outdoor recreation. range. timber. watershed, and wildlife and fish purposes " This Act Supplements the Organic Act of 1897 Which States that National Forests shall furnish a continuous supply of timber for the use and necessities of citizens of the United States Based upon these Acts, the Forest Administrators manage the lands entrusted in their care (see comments 302 and 310 below) As to the wildlife. we are committed to maintaining habitats that ensure viable populations of species found on the Forest Plantations become habitat for species associated with young growth forests (early successional stage habitat)

301 Clear-cutting. road building, OHV damage should be curtailed Roads Should not be built or maintained for recreational purposes Clear-cutting Should be limited (2-5 acres) and far enough apart Boundaries should be irregular and narrow to provide effect for wildlife habitat

The multiple-use concept of the Forest Service is well established See the resolution to Comment 300 above OHV's. in the Final Plan. will use only designated roads and trails We believe this will minimize the damage you mention Concerning limits on elearcutting. the Plan will harvest approximately 30% of the annual timber volume by using uneven-aged silvicultural Systems Group selection. Which has a maximum size of five acre openings. is one of these systems The other. individual tree selection, results in even smaller openings

302 DEIS 4-106 Visual Resources -" change from a naturally appearing condition to that of a managed state " What is a managed State? How was it decided that a managed state was preferred to the "naturally appearing condition " How was It determined that the decline in visual quality was" within the limits of acceptable visual quality objectives " The preferred alternative is certainly not within the acceptable limits as it relates to the needs of Joshua Tree Girl Scout Council It is interesting to note that visual quality is expected to decline in all alternatives Will there be any action taken to enhance visual quality in areas of poor existing quality?

A "managed State" Simply means that activities will be occurring to maintain a healthy. productive forest and continue the multiple-use concept of the National Forest System It does not mean a Forest visitor will see neat rows of trees all the same size, rather, views of managed areas within the Forest will show evidence of past and current activities

A "managed state'. is not always preferred over a "naturally appearing condition " In those areas assigned Retention or Partial Retention Visual Quality Objective, natural appearing is preferred and will dominate in those areas In addition. all classified wilderness (264,071 acres) will remain totally natural

The discussion about the Visual Quality Index in the Visual Resources section of Chapter 3, FEIS. describes how a reduction in visual quality would be "Within the limits of acceptable visual quality objective " Essentially. the Initial Visual Quality Objectives are the acceptable limits of visual

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alteration When visual quality changes Forest-wide. but does not change greater than the IVQO's, then we consider the change acceptable within the visual Management System

Enhancement of visual quality includes revegetation of poorly growing sites or thinning of overstocked. visually impenetrable Sites Prescribed burning in decadent chaparral often results in a more varied. colorful landscape Area closures for resource protection allows sites that have deteriorated visually to "heal" and grow back to naturally appearing Recreation Sites that lose vegetative cover are replanted Roadside cut and fill slopes are reseeded to reduce the visual Impact of denuded soils

303 The Forest Service states that the Visual Quality of the forest will decline dramatically as a result of the Proposed Plan "Except for existing Wildernesses. the trend of visual quality in the Planning Area is to change from a naturally appearing condition to that of a managed State The average Forest visitor. in the conifer zone. will be well aware of timber harvesting activities along all but the most visually sensitive roads and trails " These two statements alone testify to the need to reevaluate and revise the Proposed Plan

We have. in fact. reevaluated and revised the Draft Plan to include uneven-aged silvicultural systems Please see comment 301 and 302 above

310 The plan states that the FS accepts short-term departure from VQO's in order to maintain long-term desired visual character (pg 4-22,Plan) We do not consider "several decades'' a short-term departure as mentioned in paragraph 3, pg 3-46. Plan A tree farm appearance is not visual quality under any circumstances in a National Forest

This Standard and Guideline provides for those conditions where a poorly stocked. slow growing Stand of timber could be harvested and replanted The departure mentioned would occur in Retention and Partial Retention areas and would generally last no more than three decades and less in most cases For-the following reasons, we believe the typical tree farm appearance will not occur on the Sequoia
(1) forest lands are Irregular.
(2) vegetation grows at different rates, and
(3) the Preferred Alternative includes uneven-aged silvicultural prescriptions that will retain many age classes within a single viewshed

311 Studies indicating that "the visual resource could be maintained consistently Poreat-wide" is misleading and crazy This is maintenance only after severe deterioration

We believe that once the forested landbase has reached a fully managed State. the visual quality will be maintained
See 302 above

312 In terms of visual sensitivity to reduce "visual monotony " Through the use of elearcutting is a highly subjective statement with which we disagree strongly

We believe that within expansive stands of some timber types. the best method to reduce monotony and create diversity in size class and species is to harvest and replant

320 On page 4-22, Plan, it states that retention of VQO in the foreground will be met on Highway 190 This is misleading As one drives along 190, there is evidence of human activity in terms of fallen logs. debris and the highway itself Strewn With debris As to whether this is firewood cutting or timber harvesting, either way. this Should be monitored

State Highway 190 traverses the Forest from the westerly boundary near Springville to Quaking Aspen Meadow at the intersection with the North Road (FS21S50). The highway is maintained by the State, the land on either side by the Forest Service (except the private land around Camp Nelson) Timber activities that have occurred in the past along this road are well Within the guidelines set by the Retention Visual Quality Objective

400 Visual Quality Objectives Map *a)* Why is there a narrow strip of Modification along the lower Kern River and 2 large areas of Retention (not visible from Hwy 178)? b) Why is the Woolstaff Meadow area (Piutes) Partial Retention? c) Why is the Kelso Drainage (Piutes) Partial Retention and the area north of Bright Star Canyon Retention' d) In the Piutes, except for the PCT, why do the scattered Retention areas have a higher classification than Highway 155 (Greenhorn Summit)?

The Visual Quality Objectives of each area mentioned were assigned to be compatible with the Recreation Opportunity spectrum as stated in the Resource Program Direction for Visual Resources, Chapter 4 F Visual Resources, Forest Plan Since the Preferred Alternative of the FEIS is different than the PRF Alternative presented in the Draft Plan. another review for specific objectives is advised

401 The DEIS States that about 252,000 acres will be managed for the modification VQO and another 77,600 acres for maximum modification This represents nearly 40% of the Forest Land Outside classified wilderness The Forest is projecting a great deal more M and MM than is likely to occur with the levels of commodity outputs suggested

Revisions to the PRF have resulted in a visually improved alternative the Preferred of the FEIS This new alternative has about 195.000 acres in Modification and 63,000 acres in Maximum Modification This revised acreage equals about 30% of the National Forest outside wilderness and 23% of the total Forest landbase Given the Outputs of the RCM. the Forest Management Team found the adopted VQO's compatible and the M and MM lands justified to meet the highest resource values

402 I doubt that much of the non-timbered land would ever be managed for M VQO, most activities in these lands would meet at least Partial Retention and would often meet Retention The Plan should not be suggesting a lower VQO than Would normally be expected

About 40,000 acres outside the conifer forest vegetation type will be managed for M or MM Activities such as wildlife management. type conversion and fuelbreaks result in these visual objectives

403 ..Some of my specific areas of concern are 1. Hume Lake District-All the MM east of Hume Lake should be eliminated Lands visible at middleground distances from the Kings Canyon Overlook, foreground from Buck Rock Lookout and foreground from Highway 469 through Hartland to Eshom CG need to be managed for PR 2 Tule River District - The MM south and east of Mountain Home and ell MM within the Lloyd Meadow Basin should be eliminated Because of terrain and watershed constraints. I doubt that the Forest would ever Want to manage this part of Lloyd Meadow as MM FG views from the Needles trail end Lookout need to be Pr 3 Hot Springs District - Much Of the Steep land between the Western Divide

Resolutions of each of your concerns follow in the order listed
1 The land with MM is heavily roaded in places and is primarily steep timberland We find the MM VQO appropriate The Kings Canyon Overlook will be treated as Sensitivity Level 1 Buck Rock Lookout and Highway 469 are considered low use and assigned Sensitivity Level 3 M is consistent With the Forest Service Visual Management System
2. These areas have been reexamined and the VQO's are believed justified given the terrain and resource values The Needles Trail will be treated as Sensitivity Level 2, the lookout as Level 3
3 These areas have been reexamined and the VQO's

and Lloyd Meadows Road should be PR since roading and timber harvesting is Unlikely and typical activities would not meet M VQO Much of the MM west of the Western Divide is unlikely to occur because of Soil and water constraints, particulary south of Bone Creek 4 Cannell Meadow District - The MM around Sirretta Meadow/Peak Should be reduced in area The PG views along the roads and trails between Smith Meadow and Bull Meadow need to be PR as well as the PG along 21S02 past Beach Meadow to Lion Meadow. The M within the Scodies is unnecessary 5 Greenhorn District - State Highways 155 and 178 need to be managed for R in the FG and PR in the middleground These are heavily travelled State Highways that require USPS attention The MM around the GSA Camp (Sunday Peak) needs to be pulled back out of view of the camp and their facilities; M is the lowest VQO that Should be assigned here. There needs to be PR in the FG of Shirley Meadows Summer Home Tract. the ski areas and 25S03 between the Greenhorn Summit and the vicinity of the Ski area

are believed Justified given the terrain and resource values

4 The MM around Sirretta Peak has been completely eliminated The roads and trails you mention are assigned Sensitivity Level 3 and will be so managed Much of the M in the Seodies has been eliminated In the Final Plan

5 Highway 178 will be managed for Sensitivity Level 1. Highway 155 for Sensitivity Level 2. The MM in the vicinity of the GSA camp has been eliminated The other areas mentioned were reexamined and the VQO's are believed Justified given the terrain and resource values

404 The visual integrity of Forest land bordering National Park land should be compatible with Park visual standards (example Panoramic Point road and clearcuts)

We have recognized the travelways and use areas within National Park and other adjacent lands A Forest-wide Standard and Guideline has been included Specific to that concern See the visual resources section In Part F, Chapter 4, Final Plan

The road you mention is considered moderate sensitivity The cut units you mention are visible from the Panoramic Point Trail and Vista Point They are in middleground and background distances from the observer At this distance clearcut Units are compatible end. we believe in keeping With the multiple-use concept Of the National forest system

405 . In the area of Visual Quality Objectives p 3-119 thru p. 3-121, in the DEIS, CORVA supports the table 3 25 located on p 3-121 of the DEIS. with the following revisions a class B and C areas should allow Modification only and only in areas that do not disturb the VQ's on existing and planned trails Exception. areas which are diseased or are mutually agreeable with timber. Forest Service. and OHV concerns Maximum Modification is totally unacceptable in OHV areas Retention and Partial Retention (selective logging) may be acceptable With OHV recreationist

The table you referenced defines Initial Visual Quality Objectives (IVQO's) developed through the Forest Service Visual Management System The direction for developing IVQO's are found in Agriculture Handbook 462 and are briefly discussed in the visual resource section of Chapter 3, PEIS The revisions you Suggest are more appropriately made later in the planning process, during the alternative stage of project-specific EA development

406 With VQO of M and MM it is obvious that visual quality in the Mountain Meadow area is not of major concern to the Forest Service It is definitely a major concern of ours We feel that

Any activity in your area of interest will receive a project environmental analysis You will have an opportunity at that time to Comment We fully expect exceptions to occur throughout the Porest

with appropriate sensitivity level as discussed in comment #1 that the area around Camp Mountain Meadows would receive a higher VQO more in keeping with our objectives at Camp Mountain Meadows

In the case of VQO's. the Porest Plan VQO's will be met or exceeded Where Modification is shown, for example. Modification is the greatest visual impact we would plan Many places within that area would meet higher objectives et any *given* time

407 The VQO Map Why is M VQO located along the shoulders of Pine Flat Reservoir? I would have expected R *or* PR There is M adjacent to the National Park. Is not it visible from the travel routes and use areas in the Park? There is M adjacent to the Golden Trout Wilderness which seems out of line with the current Wilderness policies in FS2320

The M shown along Pine Flat was in error and has been rectified *in* the Preferred Alternative Travel routes and use areas in the Park were considered when VQO's were recommended and we feel is appropriate where shown

Current wilderness policy pertinent to your question says "Because wilderness does not exist in a vacuum, consider activities on both sides of wilderness boundaries during planning and articulate management goals and the blending of diverse resources in Porest plans Do not maintain buffer strips of undeveloped wildland to provide an informal extension of wilderness Do not maintain internal buffer zones that degrade wilderness values Use the Recreation Opportunity Spectrum (FSM 2310) as a tool to plan adjacent lend management "

We believe we have fallowed this direction and. where Roaded Natural Recreation Opportunity Spectrum occurs along the wilderness boundary. we find Modification Visual Quality Objective appropriate.

410 We believe the construction of PLEIADES might be hampered by the "retention" designation under Visual Quality Objectives The short stretch of PCT which could view the proposed instruments in direct line with backdrops of Indian Wells valley where human occupation is clearly evidenced Descriptions of the spectacular nature of such views (sees "C-58") do not match our experience in this area We suggest a reconsideration of the "retention" designation of the northeastern corner of the Scodies

The project environmental analysis will consider all values and appropriate mitigation measures to meet the Visual Quality Objective The PCT and Highway 178 are assigned the highest visual sensitivity We believe the views from these travelways must be analyzed before a project can be implemented

411 .We Support most of the alternative actions with the clear exceptions of DEIS Alternatives WLI, LBU and AMN which, by their wilderness designation. Pre-empt the construction of an important wild class research instrument We support particularly PRP, CUR, MKT, PRO and WFV If Alternatives WLI. LBU, or AMN are considered. we request an opportunity to argue "on-wilderness status be granted to the northeastern most section of R37E, T26S, allowing for construction of the PLEIADES instrument

The Final Plan does not recommend this area for wilderness designation

412 Visual Quality Objectives - We are uncertain if the draft Plan's visual quality objectives apply to projects involving modifications to existing facilities We request clarification of the Plan's policies regarding for example. the reconductoring of transmission lines (i e.. the replacement of conductors with higher voltage lines) In this case we contend that these activities Should not be subjected to visual quality objectives since existing visual characteristics would not be altered

Visual Quality Objectives apply to all projects on National Forest System land When a project is proposed. whether to a new or existing facility. a project level environmental analysis will be completed Effects on visual quality and other resource values wlll be evaluated in detail

It is incorrect to say that since the existing visual characteristics would not be altered. the activity should not be subjected to VQO's The Existing Visual Conditions (EVC) may not meet the Visual Quality Objectives of the Forest Plan. In which case. the environmental analysis would recommend visual rehabilitation

420 .CORVA strongly supports the Mulitple Use concept on public lands Through the past ten years Multiple Recreationist and the timber industry have relied on each Other in the fight against wilderness additions in the Sequoia CORVA believes that the DEIS addresses this concern on p 3-113 and 3-114 We therefore respectfully request the OHV groups will be consulted and included in these for years to come

Involvement with OHV groups is a central part of OHV management in the Preferred Alternative (see OHV section of Standards and Guidelines in Chapter 4 of the Final Plan) It is important to understand the needs and desires of users in order to ensure the program is heading in the proper direction This includes both the ONV community as well as non-OHV'ers Getting various groups together to resolve problems and issues has been successful in the past and will continue in the future

421 Cooperation between Multiple Use advocates and Forest Service personnel is a must Formal. informal and telephone discussions must be used to mitigate differences between these groups CORVA believes that this request should be implemented immediately as it is a a reasonable solution to a long time problem The Forest Service should look for ways to work with the competitive concerns That being recreationist and business concerns Our basis for this concept is the Statement on p 4-108 Of the DEIS "changes will often dominate the landscape" and on the same page "The average forest visitor in the conifer zone. will be aware of timber harvesting activities along all but the most visually sensitive roads and trails" .CORVA hopes that "trails" includes OHV trails

All travelways and use areas are considered in the sensitivity level analysis Those trails found to be the most visually sensitive will receive management emphasis commensurate with the sensitivrty Also, see comment 420 above

430 p 2-19 DEIS - Based on the comparison of timber Outputs in MMR and CEE. the effect Of the Scenic Highway MIR is very hlgh The data on acreages involved in Appendix B is insufficient to allow analysis as to why this should have occured The loss of timber Outputs is higher than most other forest which have much greater scenic highway mileage and timber producing lands

In the comparison you describe. the FDRPLAN model would choose the timber most available at the least Cost The CEE constrains the model from harvesting much of the timber along the scenic highway corridors. the MMR does not With roading in place. the Cost would be less to harvest the large volume of timber along these roads. so in the MMR Benchmark, this extra volume would be realized

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In addition, the scenic highway corridors on the Forest contain very few acres of intersection with Other MMR zones. such as those for streamside management and wildlife, This is not the case on many of the Forests to the North and would explain why a seemingly greeter reduction in volume occurred because of the MIR Note that the biggest drop occurs in the first two decades, when the model would harvest the greatest amount from these corridors

431 p 2-187 DEIS - For some Strange reason the WFV Alternative managed to meet R and PR or better, but yet produced much greater timber outputs If this could be done in WFV. it appears that some of that timber harvest scheme would have been utilized in Alternative AMN to increase its viability

We believe we have done this in the PRF Alternative Through adjustments in the "typical" clearcutting practices, the Forest will maintain. wherever practical. residual vegetation within openings This will Soften the visual impact. In addition. the normal maximum opening will be 25 acres and the lands managed for timber production will be given a 110-year rotation (rather than the 80 to 90-year rotation in the Draft Plan)

432 p 2-225 DEIS - The statements about percentages of existing visual conditions maintained on all alternatives appears to be in error .

p 3-121 The reduction in visual condition Should be shown as 13%, not 5% Same problem in IVQO percent reduction applies The reduction in visual quality for the PRF Alternative would be almost 404 That is insignificant'

p 4-106-110 Percentage of decrease in visual quality are all understated Table 4 35 indicates a reduction of acres in VCB Class II from 467.400 to 40,300 in PRP--an increase of about 8 times the acreage in B III and increases of about *six* times the acreage in B IV and V These are highly significant changes in the environment. but elsewhere in the document there are statements that the effects on scenic quality would be insignificant

P 2-225, P 3-121 DEIS - These Statements were in error and have been corrected in the FEIS

P 4-106-110, DEIS - The percentages of decrease have been corrected where applicable

The figures referenced are EVC Class I lands that will receive management activity during the 50-year planning period of the PEIS The percentage increases in Classes III, IV and V are, for the most part. the acres from I and II that will be managed Please see the visual resources section of Chapter 4, FEIS, for discussion about this reduction in visual quality,

We do not wish to Suggest the effects on scenic quality will be insignificant. but, rather. within the acceptable limits Forest-wide as established by the Visual Management System The effects on the total forest landscape will not be significant

433 DEIS p 4-130· This indicates that the effects on visual quality will be short term The effects will be continuous and long-term when analyzed by Viewsheds

The "short-term adverse effect" is the time required for a harvest unit or road construction to visually "recover " On a project-by-project basis, this will De relatively short-term with the initial effects of exposed soil. stumps. and lack of vegetation within five years after harvest completion Forest-wide we expect it Will take about 30 years on the average for replanted conifers to reach a size Sufficient to visually blend into the surrounding landscape

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The continuous. long-term impact you mention Will occur when a total viewshed is analyzed We believe such an impact will be reduced in the Preferred Alternative The Sequoia NF harvest practices will save young growth end clumps of mature trees on tractor loggable ground whenever feasible for regeneration. wildlife end visual purposes The size of harvest Units will generally not exceed 25 acres and uneven-aged silvicultural systems will be used to harvest about 30% of the annual harvest volume from the land used for timber management Spotted Owl Habitat Areas (SOHA's), giant sequoia groves. Streamside Management Zones and botanical areas are scattered throughout the conifer forest land Each of these will receive special management that will additionally reduce the overall visual effects when analyzed by viewsheds

434 It is not clear why urban interface acres would allow M VQO in foreground or middleground Was the IVQO traded down inthose areas? The sensitivity level would have been a 1 in Such areas

We have revised the Forest-wide Standard and Guideline for Urban Interface to specify these sites would be treated as Sensitivity Level 1 in the Visual Management System Projects in these view-sheds will receive a site-specific environmental analysis to determine particular resource sensitivities

500 Visual Quality - This Subject is an outstanding example of the attempts by planners to quantify that which cannot by quantified As a consequence. the resulting terminology and techniques are Confusing and irritating to non-planners Comments re Wildlife and Air Quality also apply here

The Forest Service Visual Management System. developed in the early 1970's. is a well documented method Of classifying the visual resources of a National Forest By applying the System. an individual trained in the environmental design arts is able to quantify the relative importance of aesthetics Like any technical Subject, there are terms and acronymns that are unfamiliar to many individuals The FEIS provides a list of acronyms (Appendix I) and a glossary (Appendix J) for your assistance Other resource areas are handled similarly using their own systems. procedures and acronyms

600 I question if adequate monies for monitoring (of visual resources) are available

Please see Chapter 5 of the Forest Plan for the monitoring plan The full cost of this plan is Included in the projected annual budget Please see Appendix L of the FEIS for a discussion of the relationship between the Forest Plan and the annual budget

700 The FS explains (pg. 19, Summary DEIS) that the primary indicator of visual change is the number of acres to be clearcut for timber The Conservation Alternative. in other sections, has strongly recommended that Clearcutting and other even-age timber management practicer not be used in SQF The

The Preferred Alternative cuts about 30% of the annual harvest volume using uneven-aged silvicultural systems See the visual resource section of Chapter 4, FEIS. for the effects of this and Other changes from the Preferred Alternative of the Draft EIS

Conservation alternative would conserve visual resource

710 This letter is to introduce my set of comments FOREST LANDSCAPING AND A NEW UNDERSTANDING OF ADAPTABILITY FLOW which is subtitled NOTES ON THE ECODYNAMICS OF VISUAL QUALITY My comments tie in visual quality and some discussion of Forest Service landscaping procedures from the Forest Service landscaping manuals with the movement of widespread adaptability processes The main argument shows the mistake of clearcutting. as expected to be widespread in the Plan This is proven through explaining the very, very close connection between visual quality and damage to the ability of the forest and its life to adjust

We are not familiar With your hypothesis Therein. we have no technical response to this item.

711 I do not believe we have been harvesting our forests by any basic understanding of a natural law Underlying the projected visual quality decline in the Sequoia National Forest Plan are interruptions in the flaw of the ability to make adjustments It is this adjustment-making adaptability that flows out of the root of stability of undisturbed wilderness It restores the system of visual balance which shifts in compensation for stress

The underlying principle of Forest Service timber management practices is to maintain a sustained yield over time We recognize that natural changes will occur. that natural processes are slow, and that without human intervention. we could not successfully undertake the tasks assigned by congress

712 BLOCKING AND DIVERSION OF ADJUSTMENT-MAKING ADAPTABILITY FLOW BY STRUCTURES ALSO CAUSES DECLINE IN VISUAL QUALITY LOCAL STABILITY-THREATENING FORESTRY TACTICS HAVE EFFECTS WHICH ARE BOTH SEEN AND INVISIBLE This stability in a local sense, for specific local regions of the forest. is partly a matter of input equals output balance

We agree that Structures will be evident to those nearby and that they often cause a decline in visual quality We expect, in the more sensitive landscapes, to design and blend Structures well enough into the landscape so that an observer from 1/4 - 1/2 mile distant would not immediately recognize the structure Without having it pointed out

713 Visual quality is actually connected to the underlying undisturbed Stability of deep wilderness If Forest systems are cut off from a strong connection to these roots, decline in visual quality that follows is a symptom of blocked adaptability flow The more silvicultural practices interrupt the balance of the connection of these Systems to their deep Wilderness. the more the steady State of Forest ecosystems is disturbed Decline in visual quality is a Symptom Of thls silvicultural stress From another viewpoint it is a cause Visual damage to Forests is actual damage to Forests The response to silvicultural practices which interrupt the balances of the forest resembles a pivot, or leverage base The beam balanced on this leverage basis may shift its balance to adapt to swiveling loads on the beams As these loads are shifted. the beam which is off balance gains its balance back by

The Visual Management System clearly establishes the criteria for determining Variety classes of all Forest landscapes Since variety is a measure of scenic attractiveness, we believe visual quality is actually connected to the natural variation in form. line. color. and texture Decline in visual quality occurs when this natural variation is interrupted Project EA's are completed to analyze the resources affected by a proposed aciton When visual quality is found to be an issue or concern. these Interruptions in the natural variety are minimized to the extent possible

a flow of adaptability It gets it ability to adjust from the pivot it swings on The wilderness pivot is so deep and Stable it can shift energy back into the beam, unlike a simple machine This means the system under stress, unlike a mechanical beam, is very flexible The adaptability given to wilderness ecosystems is more economical than artificial machinery

714 A natural forest landscape may be very simple and not necessarily visually contrasting This provides a Stability whose apparent monotony is actually of very great value in its own way It6 value, in fact. lies in its very low and calming level Especially as part of a contrasting whole at the right point in a view scape. this calming level according to other visual excitements. or even almost on its own, is a type of landscape of great value Its forms are extremely regular. showing a vast undisturbed eveness, but they are not regimented

The Visual Management System recognizes that variety in the forest landscape is a desireable visual characteristic In rating landscapes. we analyze the basic elements of form. line. color, and texture to determine the existing variety Lands of low variety are generally of lesser visual significance than those With greater variety

715 Clearcuts are, on the contrary. regimented The plainness of the clearcut Shape deprive its viewer of visual stability A clearcut is a disturbance to both visual and adaptability flows of stability The artificial uniformity of the clearcut is a disturbing effect. even where the eye cannot precisely locate it in the landscape Clearcutting is unlike the great flat. rolling. even natural vistas It is a different landscape because it is cut off too far from the common evolutionary Stability Clearcutting sacrifices flexibility for a military uniformity Clearcutting. by disrupting delicate energy flows, and failing to highlight their shapes. places a misdirected artificial pathway for overall damage to slowly follow on Clearcutting over isolates damaged and disordered cores of acitivity so that their cores of activity do not blend and disappear well into the great forests After all. natural balance includes its own disorder but it does not isolate and strengthen its activity like the disorder caused by the clearcut Clearcuts fragment the forest - they break off pieces Ecologically sensitive timbering should trim along the natural boundaries of shapes to give the adaptability room to flow But is must not block natural flow at the boundary by cutting or cutting residues

Under the National Forest Management Act of 1976. harvest Units must be blended into the natural surroundings whenever feasible Although 40-acre blocks are approved for use in the Sierra Nevada. the Final Plan envisions a normal unit that will not exceed 25 acres We believe that current direction will eliminate the kind of regimentation that you discuss

716 In general, the Forest Service gives the greatest ratings of importance to those areas visible at a Short distance to many viewers This is a question, however, of artificial access rather than viewer sensitivity Viewer sensitivity, since It depends on variety. depends on a stable condition to contrast the variety so it can be noticed Thus a wiser attitude would be to value both variety and sameness in balance like the balance of the steady State of the normal forest ecosystem's scheme of input equals output For sameness and variety participate in the balance that gives and shapes that flow of ability to adjust the same adaptability flow that is visible to the viewer of the forest

Foreground (FG) landscapes (0-1/4 to 1/2 mile in distance) are seen in greater detail, and. therefore are recognized as more Important. The Visual Management System. however. recognizes that middleground views (FG to 3-5 miles) are often more difficult to manage because more area is seen from which to compare and recognize change

We do not believe that viewers sensitivity depends on variety. rather. sensitivity depends on number and types of users combined with the distance zone See 714 above

717 The Forest Service landscape manuals list five visual quality objectives These are preservation, retention. partial retention. modification. and maximum modification However. as management objectives, they must be further related to some natural principle in a direct way Otherwise, they may act artificially and stifle the adaptive recovery flow of the forest If management is not checked by some natural principle of the natural forest way. it may overstress the forest Steady state by too zealously serving human goals With less foresight than the forest's own millions of years old way of keeping things going A wise forester knows his or her own intelligence must constantly learn from the ancient forest which could survive and adapt long before there were ever foresters to manage

The Visual Quality Objectives are just that, i e , management objectives that define the desired visual management scheme of the forest landscapes Preservation allows for the natural forest process to occur, the others allow human intervention in various intensities Which, in time. permits the Forest Service to accomplish the multiple-use mandate of Congress See the resolution to comment 300 above

800 The Current Plan and DEIS are not adequate as they address issues Only on a forest wide basis where the average increase in timber sales is minor Clearcutting on the Sequoia NF is a most objectional part of your proposal from our point of view If we must have tree farms, let us take a lesson from another group in the agriculture industry You do not find intensive cattle grazing on unproductive land Intensive grazing takes place on pastures that can Support the greater numbers Can we not do the same thing with intensive timbering? Areas that will not Support predicted regrowth cycles. once cut, could be lost for ever These areas will need 300 to 500 years to reforest adequately But under present Forest Service proposed plans. they will be cut again within about 100 years Old growth. large trees will become extinct This creates an ecological deficit - a borrowing from the future

We do not propose to harvest timber in areas that cannot be regrown within a predictable amount of time Appendix C of the Final Plan describes how land is evaluated for suitability for timber management

Old growth. large trees will be retained as desired visual characteristics in many parts of the Forest

Please note that although the Sequoia Forest Plan addresses Forest-wide resources. other plans have been completed to address Regional and National issues The Renewable Resources Planning Act (RPA) of 1974 and the National Forest Management Act (NFMA) of 1976 established a process for intergrated national. regional. and forest level planning

At the National level. the RPA Assessment and Program is completed every 10 years by having information generated at the local and Regional

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levels Included in this Program is the distribution of nationwide resource of objectives among the nine *Regions* of the National Forest System

At the Regional level. plannning links the RPA Program with local Forest and State planning Each Regional plan. called "Regional Guides." plays a dual role by channeling management direction Prom the national to the local level and information from the local to the national level The Regional Guide for the Pacific Southwest Region was issued in August. 1984 This Guide sets management direction required by NFMA and Regional direction that responds to public issues and management concerns The Sequoia Porest Plan then follows the Regional Guide and integrates National and Regional issues Into the local planning effort

WATER. WATERSHED,GENERAL (280)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Should watersheds be protected from logging?	We are charged with protecting watersheds from effects of logging, not from logging per se We have established that this is possible through the use Of Best Management Practices and mitigation
200 Should a comprehensive water quality monitoring program be established for all the major rivers. streams. lakes and reservoirs on the Forest?	Extensive and comprehensive water quality monitoring programs. such as the one suggested. are extremely expensive Moreover, the benefits of such a program are limited We have found that it is more cost-effective to detect real and potential problems through frequent observation. and to use comprehensive water quality monitoring programs in situations where there are, or are likely to be. water quality problems
300 Does the Plan ignore water development'	The Plan recognizes that water derived from the Forest will become an increasingly important environmental. agricultural. power. and recreational resource in the coming decades
400 Should ell natural waters on the Forest be protected?	Yes, and indeed they are protected Protected from non-point sources of pollution through the use of Best Management Practices (BMP's) Protected from point sources of pollution by local. State. and Federal regulations

500 Is the way FORPLAN treats water values derived from timber harvest realistic or Imaginary?	FORPLAN generates water yield based on a current average of annual water yield. augmented by water yield tables that take into account evapotranspiration lost from timber harvest The values used in the water yield table were taken from Studies conducted on many Forests During this planning period small watersheds on the Sequoia National Forest will be studied to determine if these values are realistic
700 Should the Plan and/or the EIS go into detail regarding the use of Best Management Practices (BMP) a legally binding agreement with the State Water Resources Control Board (SWRCB)?	There is sufficient detail contained in "Water Quality Management for the National Forest Systems Lands. in California (BMP Handbook)" (R-5 USDA Forest Service) It is not appropriate to repeat this level of detail in the Forest planning documents Copies of the BMP Handbook and it5 Supporting documents are available
800 Should the Plan specify grass types For seeding?	No. however. the point is well taken that seeding native grasses is Often preferable. particularly as native grass Seed is now becoming commercially available in limited quantities
900 Can water yield be increased without significant environmental damage?	Yes. though environmental constraints limit the amount that water yields can be increased. and we will not trade off environmental or water quality for increased water quantity
1000 Is increasing water quantity in the Southern San Joaquin irrelevant?	No, even though water yield increases are most often derived during periods of peak flaw. almost all water in the Southern San Joaquin System is used This System has no natural outflow to the ocean, as most other systems in California have. and aquifers under the Southern San Joaquin Valley have a tremendous capacity to store water Without evaporative losses
1100 Is the Forest Service degrading water and watershed through current and proposed intensive management in specific areas?	It is our goal to plan and implement projects that do not significantly degrade water or watershed
1200 Should a standards relating to cumulative watershed effects (similar to ones include in other Sierra Nevadan National Forests) be included in the Plan?	Standards like this could very well be modified and incorporated into the Plan Standards would have to be modified to encompass conditions Found on the Sequoia NF. particularly in the Forest's more arid regions
1300 Should new hydroelectric developments be allowed in the Forest?	Hydroelectric development will be considered on a case-by-case basis It can be compatible With other Forest uses and is part oF the Forest Service's multiple-use concept

1400 Should water quality be improved to a high quality level?	Most of the water currently derived from the Forest is very high quality water with rare exception In situations where human activities have lowered water quality, we are striving to correct the problem Some places on the Forest have naturally low water quality. such as the radioactive springs in the lower Kern Canyon In these cases, we only take action if the naturally occurring lower quality water is affecting some beneficial use
1500 Should the Forest pursue opportunities to increase water yield?	Yes Though the opportunities to increase water yield from various Porest management activities are limited. additional Water is needed in the southern San Joaquin Valley. and all cost-effective. environmentally-sound techniques Should be used Moreover. water is a primary facet of the Forest Service Mission
1600 Does the Plan underestimate the impact of management activities on water quality?	We believe the Plan and EIS accurately reflect the impact Of management activities on water quality, and paint a complete picture Of the potential effects of each alternative on water quality
1700 Should the Plan describe detailed measures to protect water quality?	References can be found in the Plan. but more comprehensive details are in "Water Quality Management Pop National Forest System Land in California" (Region 5. USDA Forest Service 1979) and its supporting documents
1800 Is essential information relating to resource capabilities and limitations missing from the Plan?	Basic data is available to make sound management decisions in the Plan We expect to collect and apply considerably more information during the next planning cycle
1900 Should tlmber be cut or brush be burned solely for the purpose of improving water yield?	The Forest Service would consider manipulating vegetation for the sole purpose of improving water yield. if there were a demand that would pay for it
2000 Should the Porest determine instream flow needs for all the perennial Streams on the Forest for this planning cycle?	Those streams that are proposed for diversion wlll be Studied. and instream flow requirements will be negotiated The State of California has the ultimate authority to set minimum instream flow requirements on all lands within the State
2100 Should more attention be paid to the management of water resource in the Plan?	The Forest Plan adequately addresses the water resource The water resource will get more attention at the project planning level
2200 Will mitigation keep downstream damage within limits implied by Figure 4 2 (DEIS)?	We believe we can limit cumulative watershed effects through the use of Best Management Practices. streamside management zones. and monitoring projects for potential cumulative effects

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2300 Under CP 7 - Watershed. this Statement could be used to reduce meadow restoration in the CF 7 zone It should be changed to allow restoration in other areas	We make every opportunity possible to restore riparian habitat The wording is not meant to be a limitation
2400 Water quality is fine	Thank you for your comment

GROUNDWATER (289)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
200 Is there adequate groundwater to support the proposed Peppermint Ski Area?	This is beyond the scope of the Forest Plan Please refer to the Peppermint Mountain Resort FEIS
300 Should an extensive general survey of groundwater be conducted on the Sequoia National Forest7	No. such a Study done for its own sake would be expensive and probably not very useful Some general information does already exist. however, problems associated with groundwater on the Sequoia NP are very site-specific by virtue of the nature of the groundwater in the Sierra Nevada Consequently. investigations are best done on a site/project-specific basis, with the information gained in each case retained for reference on future projects
400 Should groundwater be monitored?	Groundwater quality and quantity are monitored with the respect to the operation of the 24 wells and 35 springs providing water to campgrounds and administrative sites Further monitoring. Without a specific purpose in mind, would not be an efficient use Of resources
500 Should potential impacts on groundwater be listed in the Forest Plan and/or EIS?	These potential impacts are spelled out in the Forest Service Manual and other sources Inclusion in the EIS is possible. but it would be analogous to adding the whole Best Management Practices Handbook to the PEIS Such lengthy detail is not warranted in a general document such as the Forest Plan and FEIS

RIPARIAN AREAS. GENERAL (295)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Should grazing and timber harvest be excluded from streamside management zones?	Streamside management zones are managed for multiple-use with an emphasis on water quality Grazing and timber harvest are allowed where the water quality will not significantly be effected
200 Streamside Management zones should be widened to include all riparian vegetation	Streamside management zones encompass riparian vegetation and are referred to as riparian areas

300 The zone (SMZ) of protection should be based on actual distances from the watercourse at any given point throughout the disturbed area and should not be based on average distance. as is currently proposed.	The streamside management nones (SMZ's) in Table 4 32 of the DEIS are minimums. not averages as stated This correction has been made
400 Riparian resources can't be professionally managed with silviculturists and range conservationists	The Plan has been updated and now states that the new Riparian Standards and Guidelines will be followed One of the new Standards is "Whenever riparian vegetation is subject to proposed manipulation or utilization. the project's (Activity's) interdisciplinary team will include or consult a person trained in both formulating effective prescriptions for streamside Management Zones and in monitoring the field results "
500 The plan fails to emphasize . or state how riparian conditions will be conserved and enhanced	The Plan has been updated and now states that the new Riparian Standards and Guidelines will be followed These standards and guidelines protect riparian areas If a riparian area needs improvement it will be added to the Watershed Improvement Needs program and treated
600 Would *you please* detail the management practices that will guarantee adequate riparian zones to protect wildlife habitat and to assure against unacceptable silting of the forest waterways	The Plan has been updated and now States that the new Riparian Standards and Guidelines will be followed These Standards and guidelines direct the management practices that will protect riparian wildlife habitat and assure against unacceptable silting of forest waterways
700 Is 56.000 a Sufficient annual budget for monitoring the riparian program'	This amount has been changed to $30.000 annually
800 Are riparian areas included in streamside management zones? If so, are they wide enough and do they receive special management7	Riparian areas are included in streamside Management Zones The Zones receive special management for the protection and/or enhancement of the riparian ecosystem and the Widths are set accordingly
900 To protect riparian areas from sedimentation. tractor logging should be limited to slopes less than 35%. and 30% when soils are more susceptible to erosion	We feel that tractor logging on slopes up to 40% can be done without significant soil movement TO insure this we have added in the standards and guidelines for timber management that tractor logging on slopes above 35% will require an on-the-ground interdisciplinary team evaluation to set mitigating guidelines for soil protection
1000 Targets should be set for streambank erosion control in meadow areas	Streambank erosion control is part of the Watershed Improvement Need program (WIN) The plan States that we will treat 140 acres of watershed annually A great deal of this treatment is streambank erosion control in meadow areas

1200 SMZ's are not sufficient.	Streamside management zones that are stated in this planning process are Only minimums. The actual SMZ will be set by a person trained in both formulating effective prescriptions for SMZ's end in monitoring the field results
1300 Validation of riparian S&G use does not identify the need to modify an S&G if riparian dependent resources are being negatively impacted	The Plan has been modified and now states that the new Riparian Standards and Guidelines will be followed These standards and guidelines identify the need to modify and continually strengthen the regulations in riparian areas.
1400 In riparian zones an emphasis should be placed on high quality aquatic habitat	Through the implementation of BMP's and the Riparian Standards and Guidelines. the Forest Service has emphasized aquatic habitat The emphasis is to protect the existing aquatic habitat and where them is an opportunity. improve it.
1500 Streamside management zones should be widened and activities (logging. grazing. vehicle traffic) prohibited from the zone	Streamside management zones that are stated in the planning process are only minimums The actual SMZ will be set by a person trained in formulating effective prescriptions for SMZ's The prescription will State what is prohibited in the zone
1600 A more comprehensive plan of inventorying and management is needed for riparian and meadow areas	The Forest Service inventories riparian and meadow areas that are in need of improvement (Watershed Improvement Needs program) An extensive survey done for its own sake would be expensive and probably not very useful The Forest Plan has been updated and now states that the new Riparian Standards and Guidelines will be followed and Meadow Standards and guidelines will be produced These standards and guidelines direct the management practices tnat will protect these ecosystems
1700 No grazing, logging, or fuelwood cutting in riparian zones	The Forest Service has Riparian Standards and Guidelines that to a great extent limit, and in many cases prohibit. these activities
1800 Streamside management zones should be managed to increase water yield	The emphasis in SMZ's is to protect the riparian ecosystem Chaparral treatment and timber harvest Outside of SMZ's will be assessed for increasing water yield

WILD & SCENIC RIVERS (300)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 The Forest Should protect the Kings River upstream from the confluence With the North Pork by recommending it as part of the Federal Wild & Scenic River System for the following reasons 1) It is an outstanding area for boating with clearwater and easy access. 2) It is the only true "Big Water" experience in the southern 2/3 of the state, 3) It has unique scenic and recreational values that far outweigh the values of a dam, 4) The river canyon provides 40% of the winter habitat of the North Fork *Deer* Herd, 5) Segments 1 and 2 have been identified as part Of the California Wild Trout Program	Legislation (HR799) for the Segment of river discussed was enacted in November 1987 This has established the Kings River Special Management Area as well as designated a 5-mile segment of the main Stem Kings. and all of the south and middle forks as components of the Wild and Scenic System Please refer to Forest-wide Standards and Guidelines in the Forest Plan, Chapter 4, for direction regarding candidate Wild and Scenic River Management Please note that at the time of this writing. the Kings River Conservation District (KRCD) had withdrawn their proposal for a dam at Rogers Crossing
200 I oppose deferring or delaying a recommendation of the Kings for inclusion in the Wild & Scenic River System	Refer to 100 above
201 The recommendation on the Status of Segment 1 of the Kings River should be deferred	Refer to 100 above
300 The "Monache Segment.' of the South Fork should be recommended for Scenic classification	This change has been made in the Preferred Alternative except about 1 2 miles on the north end has been found eligible for wild and is so recommended The recommendation of Scenic classification is made with the understanding that such classification wlll not preclude ORV use in the river corridor
301 I oppose the apparent intention to develop paved road access to the Monache Meadows area and the South Fork of the Kern There is no need or justification to introduce major new public impacts in that Special and relatively secluded area	There is no plan to develop paved road access to the Monache Meadows area and the South Fork of the Kern
400 The Lower Kern River below Lake I abella should be evaluated for potential inclusion in the Wild and Scenic River System It is a valuable recreation resource to thousands of individuals	A review Of thrs river has been done and is Included in Appendix E of this EIS Even though this review determined not to pursue Wild and Scenic River Status, we recognize the importance of this resource and have included emphasis on water-oriented recreation in our plan management direction (see Chap 4)
410 Do not include the lower Kern River and Lake Isabella in the Wild and Scenic River System.	Refer to 400 above
500 The North Pork of the Kern from the Kern/Tulare County line to its headwaters Should be classified under the Wild & Scenic Rivers System	Enactment of S-247 in November 1987 Included all Of the North Fork Kern River from the Kern/Tulare County line to its headwaters as a Wild and Scenic River The Porest Plan includes classification for individual river segments (see chap 4) A management plan for this river will be prepared within

	3 years and address all activities which occur in the corridor Public input will be an important part of this effort
600 The dividing point between Segment 1 & Segment 2 on the South Pork of the Kern should be moved down stream to the Forest boundary to protect the riparian areas & preclude FERC project No 4805 Which would dewater the river for nearly 2 miles	The California Wilderness Act of 1984 specifically precluded wilderness designation of the river corridor along the South Pork of the Kern from the Forest Boundary to original Dome Land wilderness boundary to allow for evaluation of this potential small hydro project It would be inappropriate to change segmentation of the river to preclude the project at at this time Any proposal to develop a small hydro project will require the evaluation of all environmental effects following NEPA requirements.
700 Segment 1 of the South Pork of the Kern should be classified as recreational under the Wild & Scenic Rivers System	Segment 1 of the South Pork of the Kern River was found to be eligible for classification as a recreation segment. However nearly all of the segment is on Private land Congress considered this point in developing legislation and chose not to include Segment 1 Hence. S-247, which designated the South Pork Kern as a component Of the Wild and Scenic River System includes Segments 2 through 6 and not Segment 1.
800 Humans have a long and intimate relationship with rivers Providing concentrated resources in their canyons, river were the cradle of civilization and remain its lifeblood. In today's modern world a new focus on rivers has arisen - recreational use. The Outdoor Recreation Commission Study of several years ago documented that almost no activity has increased at a faster rate than river related recreation in the last 15 years Today, less than 2% of America's river mileage remains natural enough to be protected as part of the National, Wild and Scenic River System Of this fractional amount only approximately 9% has been formally designated as part of the system Thus. at a time when river-based recreation is growing faster than any other, less than 2 out of every 1000 river miles in America are formally protected for their natural values and recreational use	Of the three rivers surveyed for inclusion in the Wild and Scenic River System. the Porest recommended designation of 118 miles in its DEIS Enactment of S-247 and HR799 in November 1987 designated all of these miles as part of the Wild and Scenic River System (see Plan. Chapters 3 and 4)
900 Whereas. the Kern River is a resource that should be protected due to its remarkable Scenic, recreational. geologic. fish and wildlife. and historic values; and whereas, the inclusion of the reach of the North Pork to the Tulare County line would protect areas of substantial and remarkable scenic. recreational. geologic. fish. and wildlife, and historical importance	The Forest-wide Standards and Guidelines in the PRP Alternative indicate that management of the North Pork of the Kern River (as well as Other wild and Scenic Rivers) will be in accordance with legislation on Wild and Scenic designation

1000 Part of the Draft Plan that I find totally inadequate. The socio-economic portion states the only 15 part-time Jobs would be lost. At Zephyr alone them are 15 full-time seasonal emplyees who work on the Kings I would guess a minimum of 25 for Kings River Expeditions and 15 for Spirit Whitewater

We cannot relate the 15 number to any part of our documents. However, be aware that all employment figures discussed in the Plan and the FEIS are net totals and include Jobs lost as well as gained

1100 With respect to the proposed management plan For you to take a Stand on the Rodgers Crossing area without all the facts available would not be prudent or objective. If the Kings River Conservation District Studies indicate a favorable Opportunity to capture additional Sierra Nevada run-off, Which would lessen the already severe underground over-draft situation in the Southern San Joaquin Valley, it would be wrong to have included that portion of the Kings River in the Scenic and Wild Rivera Act.

We agree that it is essential that important decisions should be based on evaluation of all available data That is why we deferred the decision on Segment 1 of the Kings River in our DEIS. However. enactment of HR799 resolved this matter Also see #100 above

1200 Segment 2 (South Fork Kern River) - FS boundary through Dome Land Wilderness, 28 5 miles Already protected by flowing through the Dome Land Wilderness, this segment of river is presently receiving the highest level of preservation. Highest Potential Eligibility = Wild: Cons Alter. Recommendation = Wild

We have established wild classification for this segment (see Plan. Chap 4)

1300 Segment 5 (South Fork Kern River) - through Monache Meadows. 8 2 miles Received an eligibility rating of Scenic from SQF, but because of its location and its own special values. it should receive a higher designation in Order to provide more complete protection In past controversies over the prior existence of 4-wheel drive roads in areas designated as wilderness. decisions have favored wilderness The present roads should not preclude a wild designation for these miles of river Highest Potential Eligibility = Wild, Cons Altern Recommendation = Wild

Our evaluation indicates that the highest eligible classification for most of this segment is scenic Approximately 1 2 miles an the north end has been found eligible for wild The Forest has established the highest eligible classification of scenic for about 7 0 miles and wild for about 1 2 miles With the understanding that scenic classification will not preclude OHV use within the river corridor

1400 Based on the well-known resource values of the Kings River. the segmentation and recommendation here are quite different from those of the FS Segment 1 - Pine Plat Reservoir to confluence with North Fork, 1 mile This segment is utilized by boaters, picknickers, swimmers. anglers. and others and has access provided by a parallel road and is crossed by two bridges Highest Potential Eligibility = Recreational. Cons Alter. Recommendation = none Segment 2 - to Garnet Dike Campground, 7 j miles This segment is heavily used by boaters and

Enactment of HR799 has rendered the specifics of resegmentation between Pine Flat Reservoir and Garlic Meadow Creek a moot point The stretch between Garlic Meadow Creek and the confluence of the Middle Fork and South Fork has been established as wild classification Please refer to the Forest-wide Standards and Guidelines in the Forest Plan. Chapter 4, for direction regarding planning for designated rivers.

is paralled by a road. providing access. but detracting from the otherwise outstanding scenic surroundings. Highest potential eligibility = recreation, Cons. Alt. Recommendation = recreational Segment 3 - to confluence of Middle Fork/ South Pork. 9.5 miles. Access to the river is limited to trails The portion of this segment up to Garlic Meadow represents that which could be flooded by a completed Rodgers Crossing Reservoir The values described for the river in general are obvious here. making this segment easily eligible for Wild designation High Potential Eligibility = wild. Cons Alter Recommendation = Wild

1500 The Conservation Alternative proposes to resegment to allow the full values of the entire length (South Pork Kings River) to be considered Segment 1 (as redefined) enjoys little access, is surrounded by fairly steep canyon walls and presents many of the outstanding values of the entire length of the canyon Highest Potential Eligibility = Wild. Cons Alter Recommendation = Wild Segment 2 - to Road's End, 12 5 miles Paralleled by State Hwy 180, this Segment is easily reached by anglers. swimmers, hikers, and campers Highest potential eligibility = Recreational. Conservation Alter Recommendation = Recreational Segment 3 - to headwaters in Sequoia/Kings Canyon National Park, 22 miles This segment. entirely within Kings Canyon National Park. is truly deserving of Status as wild Highest Eligibility Potential = Wild. Conservation Alternative Recommendation = Wild

The Preferred Alternative subdivides Segment 1 at Horseshoe Bend and establishes a wild classification The remainder of Segment 1 and Segment 2 are established for recreation classification Segment 3 is in the national park has been recommended to the National Park Service as Wild

1600 KRCD first touted this project as a means to help correct the ground water overdraft problem in the valley but has turned the project into a hydro-power project so as to make it economically feasible The Water gained by this project is so marginal the dam could not be payed for on its water storage merits alone They have to tack on the Hydro to pay for it and the fact is. we don't need this additional power generation so why destroy the Kings for such ridiculous reasons7 The river in its current State offers premium whitewater rafting and kayaking which *are* outstandingly remarkable The river has one of the longest boating seasons Some years see a season of April through Sept The river has one of the largest run-offs This means flows in the Spring of 5,000 to 20.000 CFS This is the only river in Calif Where a boater can test his skills against high water flows such as those Pound on the Grand The river is an excellent training ground for novice boaters

Legislation enacted in November 1987 (HR799) has designated a portion of the Kings River as a Wild and scenic River and established the Kings River Special Management Area This action will ensure that the values described will be maintained over time

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The Kings can be run at lower flows in June and later by inexperienced boatmen Without the risk found an the Other rivers above The river is not as dangerous as the other local rivers, experienced boatmen can take inexperienced crews and have a relatively safe trip	
1700 My main interest concerns the Kings River In regard to segment 1 of the Kings River. the part the FS deferred in its recommendations due to water withdrawals When the Kings River Conservation District completes its feasibility Study I would like to see the FS conduct a Wild River study in order to evaluate the wisest use of the river I believe any less would be a disservice to the public	See #100 above
1800 Fish and Game has designated these portions (the Upper Kings River) as "Wild Trout" water and the angling public considers this area one of the best on the western slope of the Sierras for the production of native, wild trout It is Stated in the DFP that "in order to provide increased public benefit. the management of the riparian zones to maintain a natural appearance and to protect fisheries is desirable " One Of the stated Forest goals is to provide increased wildlife and fish habitat capabilities on the NF by 1995 I feel both Of these goals would be best achieved by designating sections 1 & 2 of the Kings as "Wild and Scenic "	See #1600 above
1900 The KCRD has abused the rivers below Pine Flat Dam I believe, in an effort to destroy the fishery so that opposition to their other plans is reduced They had previously killed off most of the aquatic insect life with insufficient and wildly varying water flows A high dam could cause nitrogen supersaturation below it as well as inundating the beautiful canyon above I believe the achievement of these goals will also help to provide a buffer zone to Kings Canyon National Park. which will then also benefit It is my understanding that the National Forest section of the canyon provides 40% of the winter habitat of the North Fork Kings River deer herd	We have no technical response to thebe Statements of opinion
2000 With so little natural rivers left in California. the Kings River ought to be preserved with the same foresight that gave us Yellowstone and Yosemite Conserve not find new ways to exploit the little reserves there are left San Joaquin Valley	See #1600 above

growers sold their excess water to L.A County at City rates. after having purchased it at agriculture rates

2200 This section is about 60 miles from the Lone Pine fault in Owens Valley Which is the source of the three great earthquakes that have ever occurred in California As a registered geologist I have grave doubts about the seismic safety of Pine Flat Dam

This is outside the scope of this Plan However, enactment of HR799 has resolved the issue of a dam at Rodgers Crossing.

2300 This draft is seriously flawed in its lack of study and protection of the Kings River I am greatly disturbed by the Drafts failure to study a 14 nile stretch leading up to Rodgers Crossing The best thing is to understand all aspects of the issue and this means a full Study of the stretch's Wild & Scenic potential value I urge you to do just that.

Refer to 100 above

2400 Past studies have found that Rogers Crossing Would be a grossly ineffective dam. providing Water only once every three to four years

The feasibility of the dam has been determined in Current KRCD studies Please refer to these for Specific information Also see #100 above

2700 We recommended wild and scenic river classification for the South Pork of the Kern River be removed from the PRP plan Those portions of the South Fork so recommended are already in areas classified as wilderness Since the proposed W&S areas are already in wilderness (a far more restricted classification) classifying these areas as W&S would be a gross waste of taxpayers money This classification. to satisfy a minority. Would only increase the SNP administrative costs since the wilderness restrictions would prevail

It is true that designation of the segments within existing wilderness will not effect management since wilderness regulations *are* more restrictive The additional Costs of designation are minimal for the same reason

2800 I am concerned about the Kings River recreational area above Pine Plat Reservoir Considering the scarcity of high quality outdoor recreational areas that are within easy, year-round reach of the densely populated South Bay and Valley regions, I don't believe the destruction Of the upper Kings River canyon to be a prudent tradeoff I find this area an ideal place to unwind after a hectic week in the Bay Area I am hopeful that when I have children I will have ample Opportunity to expose them to the pleasures of the Outdoor experience What better place to do this than the upper Kings River? I recommend that this river be protected in the Sequoia Plan

The area of the Kings Rivers of concern will be protected under the umbrella of HR799 and the Kings River Special Management Area and the management plan to be developed

2900 I am writing in regards to the HOBO initiative I believe the Kern River should be preserved at it present state	The PRF recognizes the importance of the Kern River by emphasizing water-oriented recreation for that stretch below Lake Isabella, even though this portion of the river is not recommended for Wild and Scenic River Status (see Chap 4) We are confident that future management under the Plan will provide for retaining existing Opportunities and conditions along the river
3000 The eligibility of the lowest Kings River Wild and Scenic River Study segment should be identified though a recommendation could be deferred	Enactment of HR799 renders this a moot point Please see #100 above
3100 2-28 Identify highest eligibility classification for Segment 1 of the Kings River. 3-123 Recommendation for Segment 1 of the Kings River for National Wild and Scenic River Status Should not be dependent upon a decision to dam or not	See *13000* above
All resource trade offs should be fully identified so informed political decisions can be made 4-115 The potential effects of W & S River listing identified on this page was confusing Are these activities prohibited. constrained. etc	The referenced Information on Page 4-115 of the DEIS has been removed from the EIS as a result of the enactment of Wild and Scenic Rivers legislation
3200 None of the rivers should receive any alternations No road construction or hydroelectric development should occur Shoreline prescriptions should be limited to 1/2 mile to fully protect the visual quality of the W&S river	Enactment of Wild and Scenic Rivers legislation has established that management will be Within Wild and Scenic guidelines and fully detailed in a river management plan On undesignated river segments. the management of those sections on the Sequoia National Forest will be controlled by this plan
3300 The deferment of both an eligibility and suitability analysis by the Sequoia National Forest (SNF) personnel within the Draft Porest Plan (DFP) and Draft Environmental Impact Statement (DEIS) on the Main Fork Kings from Garlic Meadows Creek to Pine Flat reservoir (Segment 1) is puzzling in light of this directive It would appear that Segment 1 is eligible for inclusion within the system	See #3000 above Also. please refer to Forest-wide Standards and Guidelines in the Forest Plan. Chapter 4, for direction regarding candidate Wild and Scenic River management
The DFP and DEIS appear to be deficient in regard to the eligibility analysis and resulting management classification The segmentation used in the DFP and DEIS ignores the fact that the river is so wild between Boyden Cave and Yucca Point that It is practically inaccessible The DFP and DEIS should be amended to reflect the highest possible classification for this segment of the So Fork	The South Fork of the Kings River between the confluence With the Middle Fork and Horseshoe Bend (near Boyden Cave) has been resegmented to recognize the different conditions. as pointed out by the respondent (see FEIS. Appendix E) Chapter 4 of the Plan establishes this river Segment as wild
3500 We find that the planning responsibilities were divided by the Forest Service between the Sierra and Sequoia National Forest. with each Forest addressing different aspects of the process on	The Sequoia National Forest was designated by the Region as the lead Forest for study of the Kings River Planning for the entire river was covered in the Sequoia Plan to reduce the fragmentation

separate planning tracts and on widely Separated time schedules We disagree with the profess, we disagree with the conclusions, to the extent that there are any. and we believe that the procedures spelled out by the National Environmental Policy Act and the National Forest Management Aft.

you mention However. HR799 has established the Sierra National Forest as responsible for the Kings River Special Managment Area, so we will be cooperating With them in this effort

3600 The Kings is one of the mightiest of the Sierra rivers in regards to the amount of run-off seen in the Spring each year We feel that the DFP is significantly erroneous in the area of identifying the socio-economic value of the whitewater recreation which occurs on Segment 1 of the Kings River The draft does not address the impact on local economy that is produced by the thousands who come to the area for whitewater boating. If this section of the river is not protected from a dam at Rodgers Crossing. all the whitewater recreation described abouve will be ended Any legitimate EIS for this section of the Kings River must include a description of the full range of opportunities it represents for kayakers The Upper Kings River canyon. especially in Section 1, provides excellent habitat for various game and non-game species The Kings River Canyon along the Segment 1 represents outstandingly remarkable opportunities for the hunter Any evaluation of the Kings River Canyon must include the outstandingly remarkable opportunities it presents for yearlong hiking and camping A National Recreation Trail borders the river from Garnet Dike to Spring Creek Because the Canyon is low in elevation, this hiking. viewing. and camping is available yearlong The Sequoia NP Draft Plan should include recreation as an outstandingly remarkable value because of the unique hiking and camping opportunities available The Upper Kings River was placed in the California Wild Trout program The Upper Kings River is considered by many fishers as one of the finest trout streams in the state and nation It is judged to be one of the most productive, high quality fisheries on the west slope of the Southern Sierra

See #100 above

3601 Scenic values of segment 1 of the Kings River alone are a justifiable reason for its inclusion in the National Wild & scenic River system Any size dam on this section Would greatly impact the visual quality of the river and canyon .visual impacts of management activities are seen thereby promoting the duration of viewing beyond a quick glance Diversity of landscape character is important and those with the greatest variety or diversity have the greatest potential for high scenic value The Kings

See #100 above

River is highly diversified in this area A structure such as a dam would have a massive visual impact and the landscape of the Kings River Canyon could not absorb this type of alteration without losing its visual character Each distance zone within the segment 1 area offers a distinctive natural aesthetic visual effect Dominance elements of visual recognition are form, line, color, and texture Considering that the landscape in this area has a maximum amount of diversity and therefore the greatest potential for high scenic value. it should be placed in the Variety Class, A-distinctive The landform. rockform, vegetation. and waterforms (streams and waterfalls) all are equivalent to or surpass the standards of the Forest Service for Class A-distinctive This segment 1 area of the Kings River is Of great concern to the public for its scenic value The corridors in to the River Canyon (both road and trail) are of primary importance to those who perceive this visual environment The area is Of a high sensitivity level and any dam and accompanying reservoir would completely destroy these access corridors and produce a maximum amount of modification to the view and vista with no natural transition of the seen area and thereby cause a reduction of the visual quality. Using the Visual Quality Objectives described in the National Forest visual Management System, the segment 1 of the Kings River should Without question be recommended for inclusion in the National wild and Scenic River System.

Historic and Cultural Values - The Cultural and historical resources of the Kings River and Canyon are well identified within the Draft Plan It should also be noted that early work papers on the Main Fork Kings River listed Cultural and Historical resources as an Outstandingly remarkable value Of the segment from Garnet Dike Campground to Pine Flat reservoir In light Of this. we will comment no further than to indicate that we agree that segment 1 is outstandingly remarkable for these values The Committee also questions whether sufficient information is on hand to make a determination on the value of the river and corridor from the standpoint of botanic and wildlife resources The deferred segment may also qualify for the outstanding value presented by the grand geological features of the area

3700 Kings River should be left as an area of concentrated recreation use with primary emphasis on hiking, fishing, boating, rafting. and camping I support the need for small hydro projects such as proposed by Louis Evans at Barton Flat These facilities Should be constructed with a minimum of adverse environmental and esthetic impacts They should also minimize adverse stream flows and retain the fishery	The Kings River will be managed in accordance with direction contained in Legislation However. with Wild and Scenic River status, and specifically the Special Managment Area, small hydro projects will not be allowed
3800 (DFP) failed to identify Segment 2 Of the Kings River in the evaluation process We call for an immediate reversal of the decision and a beginning of the evaluation process	See #1400 above
3900 The Kings River (Segments 1 and 2) should be given the ORV for fisheries In 1972, the Kings was one of 8 rivers in the State to be placed in the California Wild Trout program. The Kings River is considered by many to be the finest trout stream an the West slope of the Sierras and is thought to be one of the great wild trout streams in the nation	See #1600 above
4000 The issue of wildlife needs serious reevaluation The North Kings River deer herd is a highly impacted animal .the Kings River is home for the bald eagle and peregrine falcon, species whose presence has faded We respectfully request a complete and detail analysis of our comments.	See #1600 above
4200 I would like to go on record as supporting the Current Alternative (CUR) With a few exceptions. current management of the Forest has been satisfactory and it is a known system. Management concerns that I have follow There do not appear to be any significant effects of designating rivers wild and scenic within existing Wilderness However rivers are important for meeting energy needs and should not be encumbered with Special designations that may exclude energy development. I oppose any any classification that precludes energy development	Legislation (HR799 and S-247) has been enacted that designate all or portions of all study rivers on the Sequoia National Forest as Wild and Scenic This action would preclude energy development In our judgment, most river segments Outside of Wilderness which were recommended for designation in our DEIS have a low potential for additional power facilities
4500 I Support a plan that would not restrict the use of our public lands by private citizens Specifically. I support the following The South Fork Kern River be designated "Recreational." With vehicle access to the Rock House Basin portion. so that all citizens, not just hikers and backpackers, may enjoy the area This point holds special meaning for the elderly and the handicapped Vehicle use should be restricted only west of the river	The area discussed is within Dome Land Wilderness created in 1984 Designation of this Wild and Scenic River segment as recreational will not allow vehicle access since the wilderness regulations are more restrictive and prohibit all mechanized use Since it is within wilderness. a wild designation is considered appropriate and is recommended.

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION---
100 Part or all of the Rockhouse WSA is suitable for wilderness and should be so designated The WSA is a Suitable addition to the Domeland Wilderness that would provide a visual buffer, make a good biotic entry for the preservation category. and provide a buffer between the more intensive forest uses adja-Cent to the Rockhouse Basin This is an ares of immense Scenic value With no commercial timber present. therefore no economic value The wilderness designation would give added proteetion to a portion of the PCT. preserve part of the watershed of the South Fork Kern River and protect sensitive plants in the area. i e , needles buckwheat, and yosemite bitterroot, yucca molina The WSA is within the Spring and summer range of the Monache deer herd and the portion near Long Valley has historically provided critical winter range for the herd The wilderness boundary. as it currently exists. follows a Forest Service/BLM boundary and should be relocated to better fit the terrain TWO-thirds of the WSA is north of Long Valley Campground and should be designated as wilderness The Conservation Alternative strongly recommends all of the WSA be incorporated as wilderness	The Preferred Alternative recommends that 12,500 acres in the Southern portion of the Rockhouse WSA be designated as Wilderness This addition will compliment the adjacent Dome Land Wilderness The boundary as indicated should mitigate impacts on mining activities The management prescription for the remainder of the study area will be the responsibility of the BLM. the agency responsibe for management of these public lands Forest Service involvement in this area is limited to providing a recommendation in the Sequoia Plan for Wilderness If wilderness is designated. we will work cooperatively with the BLM in developing a management plan
102 1 Support wilderness status for the Rockhouse WSA on BLM lands The northern part of the Rockhuse WSA should be added to the Domelands Wilderness	See 100 above
200 We do not recommend wilderness designation for the 12,700 acre BLM Rockhouse WSA because 1) we have gone far enough in the establishment of wilderness areas in the Southern Sierra. 2) within Rockhouse Basin. there are roads. mines. and cabins. 3) landowners will be locked out of their private property along with hunters. miners. and people who don't want to hike into areas of interest The same applies to the Kennedy and Summit Meadows areas Another concern near the Rockhouse Basin area is the Chimney Peak and South Pork of the Kern These areas should remain recreational and for motor vehicle use OHV use would be restricted if wilderness The elderly and disabled would have difficulty walking into these areas CORVA recommends "on-wilderness. general dispersed recreation (PS1 prescription)	See 100 above

(320)

201 We do not recommend wilderness designation for the 12,700 acre BLM Rockhouse WSA because further study should be made on the south end of the Kennedy Meadows along with the Federal lands north and east of Kennedy Meadows. and the South Sierra Wilderness and Domeland Wilderness west of Kennedy Meadows.	See 100 above. The respondent must understand that the modification of existing wilderness area boundaries requires Congressional action This is not within the scope of this Plan

POTENTIAL WILDERNESS, GERERAL (340)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---	---FOREST SERVICE RESOLUTION--.
100 I would like to see more wilderness areas and should be so designated because 1) When back-packing or just visiting wilderness areas you can enjoy the quiet and natural character 2) We support preservation of roadless areas (wildlands). 3) Preserve wilderness designations for children 4) 100 feet of streamside zones need to be protected 5) Consideration must be given to the ecology end species diversity 6) To protect wildlife and visual impacts there should be a buffer zone of undisturbed forest around all wilderness areas 7) Native plants and wildlife need these large areas to maintain viable populations and genetic diversity 8) More trails are needed 9) Without more wilderness many animal habitats are being lost 10) Roadless areas Should be designated wilderness 11) Emphasis made on wanting wilderness preserved and protected 12) More equestrian end foot trails and maintenance needed 13) Wilderness designation will keep out ORVs	Throughout the planning process the suitability for and the consequences of wilderness designation was evaluated for all identified Further Planning Areas The Preferred Alternative is designed to produce a balanced level of goods and services from Porest land The existing 264,071 acres of National Porest Wilderness (24% of the entire Sequoia National Forest) will be Sufficient to supply a complete range of opportunities No additional wilderness will be recommended for National Forest land However. the Preferred Alternative does identify 12,500 acres of the BLM Rockhouse Wilderness Study Area which will be recommended to the BLM for wilderness
I Suggest that the adopted plan place the formerly roaded areas of Summit Meadows. Rockhouse Basin. Dark Canyon, Wildrose etc , into a "on-wilderness Study classification	Each of the areas mentioned were Studied for their wilderness/non-wilderness values The Summit Meadow area was made available to non-wilderness uses by the California Wilderness Act of 1984 Rockhouse Basin and Dark Canyon were added to the Dome Land Wilderness, while the Wildrose Ares (a RARE I area name) was included in the South Sierra Wilderness by the same Act
131 I Support wilderness designation for Moses FPA as described in the AMN alternative On examining the LBU alternative. the entire northern section of Moses is recommended for wilderness. indicating that Proposed Alternatives' use of this area for saw-timber is overly-subsidized. hence uneconomical Moses's adjacency to the Golden Trout Wilderness further enhances its appeal as a wilderness area True multiple use for this area would at the least. designate the northern and northeastern parts of Moses as wilderness The designation of Moses Mountain RNA gives further reason to designate the northern portion of Moses FPA as wilderness	Refer to 1300 which follows

132 Consider all parts of the plan very carefully to be sure that the maximum amount of natural space remains and a minimum amount of clearage and damage is done Don't let them ruin what cannot be replaced and make changes that cannot be undone	Thank you for your interest in the management of the Sequoia National Forest We feel the PRF Alternative provides a good balance of use of the Forest
133 Analysis of the Management Situation. Chap 3 I agree that "the future demand for wilderness is difficult to estimate ", however. based upon the past 20 yeras history. the demand is expected to continue increasing (page 3-22)	Thank YOU for your comment Our assessment of demand indicates the 264,071+ acres of the Forest (approximately 24%) will be sufficient to meet demand during this planning period
134 In favor of keeping Sequoia NF wild. minimizing road construction and timber harvesting How can you imply that environmentalists are in control of the Forest when only 25% of it is wild?	We appreciate your desire to maintain the Forest in a "wild" State You are correct--approximately 24% of the total land area is designated wilderness and will remain in a natural state Recognizing the mandate of the Forest Service is to provide a range of goods and services, our Preferred Alternative does not include additional Wilderness on the National Forest However. because we propose not to include new wilderness does not mean the entire Forest will be impacted by management actions Large areas of the Forest will remain much as they are today Hopefully. our documents do not give the impression that "environmentalists are in control "
150 There is still exhibited the current misconception that timber harvesting should be encouraged wherever it is capable of being produced All resources should be given consideration in all areas where they are capable of being produced Decisions must be reached on the basis of the best mix of multiple-uses on each land Unit for the greatest public good	The modeling process described in Appendix B of the EIS allows all lands to be available for all uses. within constraints imposed by the theme of each alternative The computer model, FORPLAN. then solves for the particular allocation of resource uses that produces the maximum present net value In this process nonfinancial values. such as wilderness experience. are evaluated and chosen to the extent that they contribute more to public benefits than do values with a financial return It is our opinion that the Preferred Alternative does. in Pact. provide a balance of uses
200 No new wilderness additions should be made There are more than enough Wilderness areas because 1) California has enough wilderness areas--an unbroken string form the Mexican border to Canada of wilderness lie on or adjacent to the Sierra (sic) Crest Trail 2) Too much wilderness will cost too much loss of harvest on existing areas 3) The wilderness program is restricting too much of the forest for just one purpose 4) Expansion of wilderness areas would be at the expense of the multiple-use concept 5) It will hurt the local and government economy because of lack of commercial	See 100 above

timber sales More unemployment 6) The handicapped and disabled cannot see and enjoy it 7) Fire prevention is nil in these areas 8) Forest land will be denied to all motorized vehicles 9) More roads are needed for access for the continued growth in population

201 Our forest land base allows positive taxpayers to make a living and pay taxes At a time when there is a strong demand for tax reduction, we should be trying to maximize the revenue generated off our federal lands instead of retiring the lands to wilderness where they are economically sterile

The Forest Plan, in accordance with the Multiple-Use Sustained-Yield Act, is meant to provide the optimum mix of market and nonmarket outputs. not necessarily the mix yielding the greatest economic return It is worth mentioning that we recognize the value of wilderness in our economic evaluations by assigning a dollar value to a visitor day

300 Wilderness is mainly for wildlife. to provide habitat for animals

Wilderness does in fact provide natural habitat for wildlife. but it serves Other purposes as well These include watershed and recreation values Since it is to be maintained in its natural state. there are restrictions that severely limit the ability to manipulate vegetation to benefit wildlife species

340 (For Moses FPU) Alternative PRF proposes roading during the second decade. Appendix C. however, Schedules 9 6 miles of road construction in the first decade This should be clarified. especially in view of the uncertainties surrounding the use of herbicides and the potential need for earlier scheduling of timber management on the 8.152 acres of suitable land

Thank you for bringing this inconsistency to our attention The information has been reviewed and several changes made in Appendix C of the FEIS Certainly. the availability of herbicides could affect timber harvest Schedules The number of variables involved makes scheduling difficult

350 Roads should be built at a slow steady pace over the duration of the plan, and should not be built at all where they might preclude future wilderness

Each management activity requiring road construction is analyzed thoroughly by a team of resource specialists during the Project Environmental Analysis process Planning and analysis of road construction generally begins 5 years in advance of each management activity Please note that the RARE II process evaluated all lands potentially suitable for wilderness Within the National Forest System That process received extensive public review and a Final EIS was published In 1979 This FEIS addresses all areas that were considered potentially available for wilderness as well as describes the allocation by management emphasis for released roadless areas (see Appendix C of the EIS)

370 The current realities of the Federal budget dictate that the Plan Which can be actually implemented must be one involving far lower expenditures than those required by the Preferred Alternative. Indeed. the Low Budget Alternative calls for an increase of over 64,000 acres of wilderness. while

Please see Appendix L of the EIS for an explanation of the relationship between Plan Objectives and outputs and the annual budget process Note that the Forest Plan is not budget-driven Hence, recommending land for wilderness classification purely on the basis of Short-term budget considerations is inappropriate

the Preferred Alternative would not increase wilderness area at all. This indicates that wilderness designation of significant amounts of additional land is the most economically feasible use of Porest land Therefore, we recommend that a wilderness management approach providing for all possible additional wilderness designation be adopted into the Plan

400 Oat Mountain contains many features that would make it highly suitable for wilderness designation 1 There is no wilderness in Calif with Sierra Nevada ecosystems of foothill woodlands. Chaparral, and blue/black oak woodlands 2 The bald eagle and endangered species winterin the area 3 The area is important to wildlife. and would best be managed from that Standpoint as wilderness 4 Two metropolitan areas, Fresno and Visalia, are within one hour drive of Oat Mountain. and wilderness designation would provide additional recreational Opportunities for these communities

The Preferred Alternative does not recommend Oat Mountain for wilderness Rather, it designates the area to be managed under two prescriptions - Range and Wildlife, and Dispersed Recreation No additional roading of the area is planned during the planning period Therefore. the naturalness of the area will be generally maintained Some use of prescribed fire for vegetative treatment to improve wildlife end range habitat could also occur (see PEIS, Chapter 4 under Wilderness. Further Planning Areas, and Plan. Chapter 4, Under Management Area Prescriptions)

500 If the AMN has additional Wilderness and approximately 40% Of the remainder of the Forest is managed for semi-primitive, non-motorized recreation. then it does not seem necessary to have such a high road construction and reconstruction program

Road construction in the AMN Alternative is lower than any other Alternative As described in Chapter 4 of the FEIS. reconstruction is higher due to an emphasis on upgrading the transportation network to provide access for developed and. particularly. dispersed recreational opportunities

600 DEIS p 4-2 and 4-3 Inferring that designation of Wilderness is in conflict with the conservation ethic is indicative of very strong biases DEJS p 4-14 For CED and PRF it says No new wilderness is designated thereby redeeming conservation values That is another highly biased and inaccurate statement.

The inference that creation of additional wilderness is at odds with a conservation ethic is based on the definition of "conservation" as "the wise use of natural resources " In contrast, creation of additional wilderness would not be at Odds with a preservation ethic which seeks to preserve rather than manage or use natural resources

700 Also in regard to wilderness there must be a better way to respond to OHV trespass than mere anticipation

OHV intrusions into designated wilderness will be reduced or eliminated by planning and development of an appropriate OHV trail system A comprehensive trail system planning effort is required in the Preferred Alternative (see Plan. Chapter 4, Standards and Guidelines)

800 I feel that a cut beck on Our wilderness areas is needed to give our forestry service personnel a chance to use their education that they trained so hard for

Two points warrant mention First. wilderness areas are established by Federal Law and can only be changed that way Therein. any reduction of existing wilderness areas is outside the scope of this Plan Secondly. wilderness requires management Many professional Forest Service managers received their training in recreation management and Work hard in applying the principles to wilderness

900 It is stated that the Scodies, Oat Mountain. and the BLM Rockhouse WSA will retain their wilderness characteristics under all alternatives Since in many of the alternatives (including the preferred) most of the land in these roadless areas would be classified as either semi-primitive roaded or roaded natural this does not seem likely How will these areas retain wilderness characteristics when the uses and developments proposed for these areas destroy wilderness values?

Current plans for the areas mentioned will not result in any significant changes in the existing conditions Much of the area is currently open to vehicle use and contains primitive road systems These will remain but will not be improved One activity that has been limited in the past but may occur in the future is controlled burning This may change the vegetative composition of the area but will not significantly affect the long-term wilderness character

1000 I do not approve of your current fencing of the South Pork of the Kern River in the Kennedy Meadows area It would be better to control and reroute the traffic rather than deny the river to all If the road had been routed about 100 to 300 yards away from the river in a controlled manner all of us could still get to the water and it would not have been polluted

The fencing you mention along the South Fork of the Kern River in the Kennedy Meadows area was constructed to identify the boundary of wilderness additions created by the 1984 California Wilderness Act The area was then closed to vehicles The area along the east bank of the South Fork of the Kern River south of Kennedy Meadows Campground will remain open for dispersed camping

1100 The failure of the Sequoia National Forest to protect the integrity of important roadless areas is particularly glaring in the Scodies area The 48.000 acre area was included in the California Wilderness Bill until its waning hours However. Congress continued to recognize that public interest in the area was substantial, and therefore placed the Scodies in further planning The PCT passes through the Scodies, and the area contains numerous opportunities for solitude and primitive recreation Ecological representation in the area is diverse Mojave desert. Joshua Tree woodland. desert chapparal, sagebrush. oak woodlands. and one of the finest pinyon pine forests in the state are all found in the Seodies Pinyon pine woodlands are currently not represented in the National Wilderness Preservation System Additional wilderness attributes of the area arise if the area is considered along with the CA Desert Conservation Area (CDCA) Frog Creek WSA Frog Creek has been proposed for wilderness designation in the recently introduced California Desert Protection Act of 1986 Wilderness designation of these two Units would provide the unique opportunity of traversing from the extreme of true desert to a pinyon pine forest By recommending the Scodies for wilderness. the Sequoia National Forest has the opportunity to recommend the protection of a unique and diverse area The Scodies wilderness. rising our of the desert. would provide for an equally unique recreation experience

Throughout the planning process, the suitability and consequences of wilderness designation for the Scodies FPA was evaluated In the end. it was not recommended Under the Preferred Alternative. the area will be managed with emphasis on wildlife and dispersed recreation and not wilderness In general. wilderness attributes will be little affected by the application of this prescription Project-specific EA's will address protection/ mitigation for cultural, visual, botanical. wildlife and watershed values. existing Improvements, etc OHV use will be limited to designated trails only No larger resource trade-offs requiring mitigation will occur (Refer to Plan. Chapter 4, Management Area Prescriptions)

1300 I'd like to see Moses roadless area above Camp Wishon designated as wilderness. If not possible, due to timber. maintain 1/4 mile strip existing wilderness from Maggie Mountain to Alder Creek This would protect the wilderness character of major trails into the Golden Trout Wilderness

Throughout the planning process, the suitability end consequences of wilderness designation for the Moses FPA was evaluated In the end, it was not recommended Under the Preferred Alternative. 16% of the area will be managed with emphasis on General Dispersed Recreation. 20% Range. and 64% Sawtimber Project-specific EA's will address protection/ mitigation for cultural. visual. botanical. wildlife and watershed values, existing improvements, etc (Refer to Plan. Chapter 4, Management Area Prescriptions) This includes trails providing access into the Golden Trout Wilderness

1400 Please no more wilderness I'm especially interested in the Kennedy Meadows area Also Jordan Hot Springs Should be left as it is, it's been there so long it could be a national landmark

See 100 above Jordan Hot Springs is within the Inyo National Forest The land management prescription for that area will be determined in the Inyo Plan The areas near Kennedy Meadows have already been designated wilderness in the 1984 California Wilderness Act (e g . Dome Land Addition and South Sierra Wildernesses) Alteration of an existing wilderness requires Congressional legislation and is not within the scope of this Plan

1500 I support wilderness designation for Dennison Peak Wilderness protection would aid in the protection of California

The Preferred Alternative designates the Dennison Peak FPA to be managed under two non-wilderness prescriptions - Range and Wildlife. and Dispersed Recreation No additional roading of the area is planned within the planning period Therefore. the naturalness of the area will generally be maintained Some use of prescribed fire for vegetative treatment to improve wildlife and range habitat will occur Project-specific EA9 will address protection/mitigation for cultural, visual, botanical. wildlife and watershed values. existing improvements. etc (Refer to Plan. Chapter 4 Management Prescriptions)

1600 Concerning the Kennedy Meadows-Black Rock. Rock House Basin Area I used to hike a considerable amount in that area In the past years. I have had a deterioration in my lower back which has eliminated hiking but I still enjoy the beauty of this area as often as possible in my 4-wheel drive If areas like this are continued to be shut down to off road vehicles. people like me will be deprived of viewing such natural beauty If the present trend of closing down public land to vehicular traffic keeps up. only the young and healthy will be able to enjoy such lands

The South Fork Kern River area mentioned was included as part of the additions to the Dome Land Wilderness in the California Wilderness Act of 1984 As such. the Sequoia N F Cannot reopen roads into this area--wilderness prohibits mechanized use Further. changing wilderness boundaries is beyond the scope of this Plan and requires Congressional Legislative action

We appreciate the fact that some folks require mechanized equipment to visit and enjoy the Forest This is Just one of the factors that entered into the decision process as we developed the Preferred Alternative Our Preferred Alternative is designed to result in a balanced level of goods and services The existing 264,071 acres of wilderness

(340)
(24% of the total Forest lend) is judged to be sufficient to supply a complete range of opportunities Therein. no additional National Forest wilderness is recommended in the Plan, although a small (12.500 acres) area of the BLM Rockhouse Wilderness Study Area ha8 been This will provide a logical extension to the Dome Land Wilderness

1800 The Sequoia National Forest should be preserved in its wilderness or natural state

In accordance with the Multiple-Use Sustained-Yield Act, the Sequoia National Forest must be managed for a Variety of uses and users Wilderness is just one of the valuable resources the Sequoia National Forest has to offer Forest products, recreation. range. forage. water and wildlife are other resources of the National Forest which are directly or indirectly enjoyed by all Through proper planning and management. we will be able to provide the continuous uses of all the resources the Sequoia National Forest has to Offer.

1900 Roadless areas in Sequoia National Forest should be preserved to provide quality living space for the common, endangered. rare, and sensitive species of plants and animals which have inhabited this forest for millenia Conservationists believe that wild lands are such a precious resource that the maximum acreage should be preserved Therefore. conservationists are recommending that the further planning areas and the WSA should be preserved as wilderness while the '"released" roadless areas Should have their wild land values protected through administrative designations The following areas, 151,316 acres. Should be recommended for wilderness designations Rockhouse WSA. Dennison Peak. Kings River. Moses, Oat Mountain. and Scodies

Throughout the planning profess the suitability for and the consequences of wilderness designation were evaluated for all the identified Further Planning Areas The Preferred Alternative is designed to provide a balance of multiple use and resource protection Project-specific EA's will address protection/mitigation for wildlife, botanical, cultural. visual and watershed values. existing improvements. etc The existing 264.071 acres of wilderness (24% of the total Forest land base) has been deemed sufficient to supply a complete range of opportunities No additional wilderness has been recommended on National Forest land. although 12.500 acres Of the BLM Rockhouse WSA has been recommended

2000 Roadless areas are a popular and controversial resource on our National Forests For years the public has expressed vigorous interest in the management of roadless areas Yet in draft plans being released for public comment. very little tangible information on roadless areas is provided The National Forest Management Act (NPMA) provides for public involvement in the planning process However, without the most basic information on roadless areas, the public is being invited into a process in which they are unable to participate in an informed and responsible manner.

Both the FEIS and the DEIS discuss those areas designated as Further Planning Areas under the 1984 California Wilderness Act We have invited public comments under this LMP process and addressed those comments in some detail Finally, Appendix C of this EIS includes an assessment of how released roadless areas are allocated for various management emphasis under each alternative We feel that public participation in this matter has been widespread, particularly if one considers the involvement Which occurred during the RARE II process

2200 I have witnessed first hand the dwindling Of available recreational areas and the compression of more users into less space as the result of recent

Except for the southern portion of the BLM Rockhouse WSA. no additional wilderness areas are being designated under the Preferred Alternative Areas

and past wilderness addition6 I submit for your Consideration the following comments to the Plan I support the adoption of the PRP Alternative or as an alternative the High Market Emphasis (MKT) plan with the following exceptions no new wilderness be added. recommended or considered for study in the final adopted plan The current Sequoia National Forest wilderness size is disproportionate to the Current and planned usage

that have already been designated wilderness cannot be altered without Congressional action and this action is not within the scope of this plan.

2300 Purposely leave a buffer area between wilderness areas -- wild and scenic rivers -- and human development

Buffers are not deemed necessary from a management standpoint. nor do we recognize them adjacent to designated wilderness and/or wild and scenic rivers Considerations for human development are taken into account via the Recreation Opportunity Spectrum (ROS) and built into management plans for the area

2400 The public needs to be explained to that a wilderness area and Yosemite National Park are not synonymous

We agree, and will attempt to educate people as we work together and through our information media It is difficult for many people to understand that there are different agencies of the government with different managerial philosophies for similar lands. especially if they border each other.

2500 Further (wilderness) planning areas - new wilderness areas should be considered when proposed The review team should be composed of the standard interdisciplinary teem plus representatives from conservation groups

The Interdisciplinary Team and the Planning Team coordinate with a variety of agencies and groups in the Issues. Concerns. and Opportunities identification part of the NEPA process Public input is a critical aspect of our work

2600 I agree that "the future demand for wilderness is difficult to estimate ", however. based upon the past 20 years history. the demand is expected to continue increasing

Thank you for your comment We feel we have sufficiently assessed demand and that the 241 of the Forest currently designated wrlderness will meet this demand

2700 Wilderness lands are unique in that they alone are permanently protected from human exploitation and change It is in these areas alone that the original state of our natural heritage is maintained and preserved It is quite reasonable to assume that when the 50 years of management covered by the Plan have passed. no additional areas will exist in their original state for designation as wilderness Wilderness everywhere is shrinking as human populations increase and demands on natural resources increase in response Wilderness gives us a base from which to monitor our environment Any modifications to the Forest need statistical controls with which to compare the effects of human intervention Wilderness is also highly valuable as watershed and as wildlife habitat As the population of the Central Valley grows, the need for increased wilderness will also grow The economic base Of the local

Twenty-four percent (264.071 acres) of the Sequoia National Forest has been designated wilderness This will be sufficient to supply a complete range of opportunities for wilderness users The PRP Alternative is designed to produce a balanced level of goods and services from Porest lands which will help sustain the economic base of regional communities as well as the local situation

communities of the Hume Lake Ranger District will increasingly depend on the recreational opportunities of the Forest, including the availability of wilderness areas

2800 If our forests are managed conscientiously. and wildlife protected. we would not have to have more wilderness Wilderness is mainly for wildlife, to provide habitat for animals who are slowly being pushed out of their present areas. When man enters the wilderness. he should remember he is there only as a guest

Thank you for your comment

2900 Site specific analysis of the ecological qualities of the release areas under the California Wilderness Act These areas are distinctive in their roadless quality. sufficient originally to warrant consideration as wilderness. The DEIS needs to indicate the location. characteristics and alternative disposition of these areas The California Wilderness Act does not preclude the Forest from designating the areas as wilderness

Through the RARE II process and subsequent California Wilderness Act of 1984, all but six areas were released to "on-wilderness Status These released areas were adequately analyzed as to ecological qualities during that process (refer to PEIS, Chapter 3 - Further Planning and Wilderness Study Areas) Pour Of the remaining Further Planning Areas and the BLM Rockhouse WSA are considered in the Sequoia planning process and recommendations provided The Cypress Further Planning Area has been considered by the BLM in their planning efforts The Kings River area was dealt With when HR799 was enacted in November 1987 and established the Kings River Special Management Area.

3000 Roadless area classification for appropriate areas possibly created by Forest road obliteration plan

The RARE II process evaluated all lands within the National Forest system Through this process all roads existing at that time were evaluated When an area contained "on-engineered roads it was considered roadless This process received extensive public review and a Final EIS was published in 1979 The FEIS established all areas that were considered potentially available for wilderness

3100 As a citizen that enjovs the Kern Plateau, may I suggest the following for your 50 year plan no "wilderness" next to private land

The Preferred Alternative recommends that the southern portion of the Rockhouse WSA be designated wilderness The boundaries should have a minimal impact on private lands

3200 The wilderness portion Of the plan Should be revised Adequate coverage should be made on an objective basis of all potential wilderness areas and no alteration of Such lends Should be permitted Until a final decision is reached Forest Service bias on this Subject is clearly evident Areas should not be postponed for "further Study" but Should be assessed under this plan Wilderness designation is recommended in those remaining areas that meet the required standards

The Forest Service believes the decision on wilderness is adequate The Further Planning Areas have been managed to maintain their wilderness characteristics Until a final decision is made through the LMP process The Preferred Alternative does not recommend any additional wilderness within the Sequoia National Forest However. 12,500 acres Of the BLM Rockhouse WSA are being recommended for wilderness No Further Study Areas remain as a result of the decision on this Plan

(340)

3300 I am against the encroachment upon our roadless areas We have not made adequate studies Into how small an area can support a healthy and diverse ecosystem My conception of the National Forest is for multiple use by all the people As population pressure continued to degrade our wilderness areas, we are steadily reducing the areas that are suitable for recreational use

Twenty-four percent (264,071 acres) of the Sequoia National Forest has been designated wilderness This will be sufficient to supply a complete range of opportunities for the wilderness user We will be monitoring the use in each wilderness to prevent their degradation

3600 I oppose allowing motorized vehicles in the RARE II areas.

RARE II resulted in some roadless areas that have not been designated as wilderness and which are managed for non-wilderness uses which could include OHV use However. OHV will not be allowed in those non-wilderness areas where the ROS objective is semi-primitive non-motorized Where OHV use is permitted. they will be restricted to designated OHV trails only Our comprehensive trail planning effort will establish the OHV network on the Forest

9000 Will Nitrogen Oxides emissions impact wilderness areas? The EPA was supposed to publish new NOx standards in 1979, they have not done so yet. if and when they ever do, will new emission levels have an effect on which potential wildernesses are most susceptible?

The effect of substances formed from nitrogen oxides on wilderness areas and forest resources has been. and will continue to be. the subject of much research The chemistry of nitrogen oxides in the atmosphere is very complex The net result of the various reactions, however. is conversion to many potentially reactive and toxic substances such as nitrous and nitric acid which can have serious effects on soil and water chemistry having little or no buffering capability The susceptibility of Sierra soils. water, flora. and fauna are currently being researched and Sequoia National Forest will continue to monitor the results of such research

PLAN IMPLEMENT (400)

---PUBLIC COMMENT (QUOTATION/PARAPHRASE)---

100 I wish to note that the DEIS omits from its list of social groups affected by the forest in Section 3-D. the so-called regional recreationalists I wish to remind the FS that a National Forest is not just a thing of local concern. but one of national concern

---FOREST SERVICE RESOLUTION---

Generally. a National Forest's immediate sphere of influence is defined as those counties within which the forest lies The residents of these counties are most affected by forest management activities in their daily lives In contrast. the effect of the Plan on all recreationists is primarily in terms of recreational opportunities provided *Please* see Chapter 3 of the Plan for a discussion of recreation opportunities

101 I support the designation of all the Special Interest Areas

Please note under the Standard and Guidelines section of Chapter 4, Final Plan. that we have classified the five Special Interest Areas that were listed in the Draft Plan

200 This is a very lengthy and technical plan that requires a great deal of study and this coupled with the inaccessibility of much of the area are the reasons for requesting that the deadline be extended for sufficient time for study and investigation I do Want to compliment you and your staff for the thought and effort that went into this plan

We realize the Plan and DEIS are lengthy However, we believe that five months was Sufficient for review of even these lengthy documents. Since they are not site-specific in alloeatlon to management emphases, no purpose was to be served by waiting for spring snow melt and access to higher elevations

300 I Strongly recommend that we save this NP. and to do so by establishing this Sequoia NF as a permanent dedicated preserve

We have no substantive response to this expression Of opinion other than to note that National Forests are not instituted as preserves. but rather as lands to be managed for multiple uses This is mandated by Federal Legislation

350 It is mainly the long-term residents that have pushed for responsible land use policies This Statement needs clarification Profit making dominates most land use policies both public and private Only by prevailing on our pbulic agencies to exert their utmost effort towards conservation - will there be any public resources for the future

It is Forest Service policy to develop responsible management actions within the context of multiple-use and the long-term management of the Forest As such, both commodity and non-commodity activities will result. We feel the PRP Alternative provides a balance of uses over time that will benefit the American public

400 Our review indicates that the FS is not properly considering a full range of management alternatives for released roadless areas as intended by Congress Except for brief summaries found in the DEIS appendices for the various land management plans. the FS is failing to provide adquate information concerning the proposed management of all roadless areas on each forest Lack of maps and area specific information is making it impossible for the public to determine how various roadless areas are to be managed under each plan alternative

Congress made Consideration of continued roadless management of "on-wilderness RARE 11 areas optional It is not required that we do so To assist the public, we have added roadless area information as part of Appendix C of this FEIS By reviewing this information. readers can determine what management emphasis is placed in each roadless area under each alternative

500 We feel that none of the FS alternatives adequately addresses the protection of sensitive plant and wildlife species nor do they call for Sufficient monitoring to address the effect of clearcutting. increased grazing. and increased OHV use on wildlife We call for the actual establishment of all 5 proposed Botanical Areas and all 4 proposed Research Natural Areas. We propose also that individual management plans be written for sensitive plant and animal species

Please see Chapter 5 of the Plan for the revised monitoring plan This contains actions for protection of sensitive species of plants and wildlife Regarding Special Interest Areas. all proposed Botanical Areas are established by this plan. and three out of four proposed Research Natural Areas (RNA) are recommended to the Chief of the Forest Service for establishment. The fourth must be evaluated before it can be recommended Individual management plans will be written for sensitive plant and animal species as the need arises

501 Insufficient data exists as to the environmental effects of timber harvesting A draft EIS is, by definition, Supposed to contain data describing the environmental risks associated with a given undertaking. Yet, the FS lists the following areas that need further research (the parantheses denote pages in the FS's Draft Forest Plan where these research

We are not undertaking projects on the Forest Which we feel will cause irreversible or irretrievable damage to the land Site-specific information is gathered and presented in project Environmental Assessments. The research needs listed in Plan. Appendix B, wlll give us limits to which we can manage We feel that we are presently managing in a

needs are stated) (Research Needs - Earth Resources Page - Appendix B-1) -Determine the soil loss tolerance values for Sierra Nevada granitic soils. - -Determine the relationship of *water* yield to vegetational management in the southern Sierra Nevada, -Determine the relationship of management practices to water quality. meadow gullying. and Cumulative watershed impacts in the southern Sierra Nevada (Research Needs - Vegetation Timber. Page-Appendix B-2) -Define in specific terms those site characteristics that make forest land unsuitable for timber management Any futue timber production Should be based on complete and comprehensive research. (Research Needs - Fish and Wildlife, Page - Appendix B-2) -Test the accuracy of the Wildlife Habitat Relationships Program and associated Habitat Capability Models -Develop an inexpensive. reliable and efficient technique to sample populations (Research Needs - Vegetation Meadows. Page - Appendix B-2) -Determine the sensitivity of the ecological and hydrological properties of meadows to management activities (e g , grazing. road & trail construction. timber harvesting) (Research Needs - Visual Resources, Page - Appendix B-2) - Investigate changes in the public's visual expectations -Determine user needs and expectations regarding recreational opportunities on the Forest

conservative "solution space " The listed research will extend our present knowledge and. thus, the "solution space " Please refer to Plan, Appendix B, for research details

502 The following unacceptable production practices in which the FS currently engages or proposes *to* implement Should be halted 1) Opening Further Planning Areas. wildlands. and roadless areas to timber production. 2) Below-cost and deficit timber sales. 3) Determining rates of sustained yield (non-declining yield) of timber for SQF on non-existent, inadequate or inaccurate site-specific data. proposing that timber be harvested in excess of the sustainable yield and including unsuitable land as being economically suitable for timber harvest The FS possesses completely inadequate, simplistic or inaccurate data regarding the Site productivity Of most of its SQP timberlands

National Forest Land is managed using multiple-use principles Further Planning Areas that *are most* suitable for other-than-wilderness uses will be managed for those uses, including timber Under the PRF Alternative. approximately 334,000 acres (49%) of the total productive Forest land base (679,000 acres) is either withdrawn or deferred from production via classification as wilderness. as spotted owl habitat, as uneconomic operable lend. or for Other resource values This leaves about 51% of the productive land to be managed for timber (this amounts to about 31% Of the total Sequoia National Forest land area) (Refer to FEIS Table 2 26 far specific figures for all alternatives) Only a small percentage of our timber sales are below Cost They are often below Cost because of non-timber. multiple-use benefits that are provided by the project Deficit sales are those that we estimate. by our appraisal methods. that cannot be lagged at a reasonable profit The fact that a large majority of our deficit sales sell show that

(400)

they. in fact. are viable sales The purchaser is still required to build roads. reforest stands, and provide all the site Protection as with non-deficit sales

The Sequoia NF Plan is not based on erroneous growth and yield information. The respondents' yield projections and their other statements have not been Supported by scientifically sound evidence and are currently being reviewed We are currently managing the Sequoia NF using the most up-to-date information and technology that is at our disposal Professional foresters and specialists plan and execute timber sales using an interdisciplinary process which meets the requirements of NEPA.

503 Additionally. all non-contracted current timber sales Should cease Until more complete and accurate data can be obtained. analyzed and scientifically-supported decisions can be made on the actual productivity of the forest

A8 described in 502 above, we Judge that existing information is adequate Hence. there is no need to cancel or postpone Planned timber sales

505 The DEIS & plan are replete with references made in a misleading manner or in bureaucratese This is unnecessary and makes the DEIS a poor presentation of the environmental Consequences involved A specific example is Integrated Pest Management Your treatment of this subject seems deliberately designed to mislead the public When all of the verbiage clouding the description is eliminated. the reader learns that the FS idea of integrated pest management is Simply "TIMBER HARVEST " Integrated Pest Management might permit a certain amount of timber harvest. but that alone cannot be all

We hope the FEIS and Plan have been written with more understandable language Regarding integrated pest management. timber management is one component of this program Without timber harvest, trees would weaken with age Pathogens would invade and kill the trees Insects may build up to epidemic proportions. killing more trees Fires would eventually level the stands and succession would be set back to seedlings. brush, hardwoods. and/or grass Congress determined that the Forest Service will harvest timber and plant new forests for the future Integrated pest management is an attempt to minimize mortality in the managed lands by working with natural systems and processes where it will benefit the Forest

506 I do not support any of the alternatives offered by the US Forest Service I would like to see the following ideas incorporated into the final Forest plan The concept of "Multiple Use" was Structured to be used in a manner which insured that the quality and diversity of the forest was in no way diminished Timber harvest levels must be reduced They were based on false assumptions in the computer FORPLAN The Forest Service is not maintaining a sustained yield now, and the problem will become worse if management direction is not changed Timber must be harvested only in areas where It is economically feasible and where growing conditions are truly suitable for the methods of harvsting and

The timber harvest levels were established by professional foresters based m the most accurate records and scientific backing available In fact. the models used have been Shown to be conservative The timber sales on the Sequoia NF are usually economically feasible Only sales that do not sell might be labeled economically infeasible. and this happens infrequently This is not to say that all the units within a sale are economical Often we are able to manage a decadent timber Stand only if we can harvest It in conjunction with higher-quality trmber The same is true for lower valued species In the past. many stands were converted to low value timber when we used sanitation harvests as a general

regeneration being implemented This is presently not the case The Forest Service should stop using cross-subsidization of tree species in making appraisals and advertising timber sales This method of pricing is creating havoc with fair market values and is used solely to induce buyers to take timber from the forest which they neither need nor desire

practice Only the lower valued species were able to reproduce in the shade of the residual stand One solution is to clearcut the stands so that the higher valued pines can be planted in the full sunlraht that they require for good growth Without "cross-subsidization" we would have to pay a contractor to harvest low valued stands that required treatment. in order to realize larger receipts on the higher quality Stands In the end. "cross-subsidization" is allowing us to provide a healthy and vigorous Forest for our posterity

600 The design of the current AMN Alternative could have been made more viable with a few changes in emphasis PROPOSAL FOR IMPROVED ALTERNATIVE This could be done by providing developed recreation at the Standard service level. reducing the road program to the level of PRF. and Increasing timber harvest by utilizing Some of the Systems employed in WFV Some of the timber lands might be dropped to M VQO -- especially MM in the PRF

Thank you for your suggestion However, as stated in the Record of Decision, the harvest level presented in PRF is required to strike an appropriate balance between commodity and non-commodity uses Both the AMN and WFV Alternatives fall considerably short of this The level of roading is that required to serve this timber program and other resource values Note. however. that PRF calls for a portion of those lands managed for timber to be managed under Uneven-aged prescriptions This raises visual quality, but also somewhat increases the miles of road built A low standard service level for developed recreation was adopted in the AMN Alternative because of its consistency with the theme of this alternative end to Show the effects of varying combinations of management

700 In our opinion most of the alternatives were only confusing to the primary issue of developing a sound management plan for Sequoia National Forest In consideration of the political and financial constraint that the forest must operate under---only some modified version of the "Preferred Plan" is likely to be adopted

The selected PRF Alternative is indeed a variation of the PRF alternative as published in the DEIS There have been numerous changes which we believe provide for a better alternative

800 As a severe consequence to massive perpetual industrialization and commercialization. man's selfishness (pertaining to the Sequoia NF) will eventually plague nature's lithosphere ultimately deleting the biosphere in its entirety Due to the malbenevolence and malbeneficence of the capitalists and mongrels alike. I urge preservationists. conservationists, ecologists, grandmas & grandpas to coalesce and counter their complete disregard for nature's right to exist

We have no substantive response to this expression of opinion

900 It is becoming more and more evident that the several Federal agencies cannot continue to prepare their own long range mangement plans independently of each other Consider the situation in the Southern Sierra The Sequoia NF DEIS and Management Plan.

We appreciate the confusion often faced by the public In fact. the Forest Service and others do coordinate their planning efforts In this FEIS, for example, we evaluate the wilderness potential of one contiguous BLM roadless area and recommend

the plans of the BLM. the Forest Service-BLM land swap, Sen Cranston's California Desert Protection Act

wilderness classification for a portion of it Similarly, the BLM has evaluated a NF Further Planning Area. While agencies can and do coordinate their planning efforts. to date there has been only sporadic coordination between federal agency planning and proposed legislation

1000 This problem of bureaucratese exists on virtually every page of the draft EIS The entire plan and DEIS violates virtually every rule of writing. The plan seems deliberately written to mislead the public. or has been written by persons incompetent in the skill of writing . The poor writing mandates a complete revision of the document

Please bear in mind that this planning process is an inherently complex one We have honestly tried to explain it in straightforward prose style We recognize that some members of the public will have difficulty understanding the complexity, but there is little we can do about that

1100 I do Support the WFV Alternative. The main reasons I support this alternative are 1) Visual resources are emphasized. yet timber is produced at an acceptably high level 2) The use of the Forest for dispersed recreational uses (especially uses related to fish & wilflife) is emphasized and desirable 3) I favor the longer rotation of timber which is used in this alternative

We have no substantive response to this expression of opinion

1200 The WPV Alternative Should *be* changed to 1) Allow the construction of 1 or more ski areas Other than Peppermint. 2) The timber harvest level should be held at the projected level in decades 1 & 2, but not be allowed to exceed 100 MMBF/yr in periods 3-5 3) The BLM wilderness boundary addition to the Dome Land Wilderness Should be changed to that in the WLI Alternative to follow more logical topographic features Incorporate the W&S River proposals described in the PRF Alternative The Kern River below Lake Isabella should not be classified W&S and the Specific management of this area determined by following the N E P A process, consistent with the direction in the WFV Alternative

We considered these changes to WFV. but *concluded* that the present set of proposals is truer to the overall concept of the alternative. Otherwise. management of the lower Kern. just as management anywhere on the Forest, is determined through the NEPA process.

1300 I approve of the Preferred Alternative plan Water is one of my keen interests. and I'd like to see the future of the water developed for this area and especially Fresno, Kings, Tulare and Kern County . Water in my Opinion is the most -- and I mean most -- priceless resource we have in the mountains

We agree With the importance of Water Indeed. in the PRF. we feel we have provided for the protection and management of water yields

1400 I would urge your Support for a sealed-down version of the Amenity Plan. This revised plan would increase the "primitive" and ""on-use" to include those areas now designated ab conifer forest. mixed chaparral. and oak Woodland I do not

Thank you for this comment However. as long as national forests are instituted to provide commodities to the public as well as such nonmarket goods as recreation, it is inappropriate to simply put significant acreages in a non-use status Note that

see the logic in trying to keep up With a growing local, national and international population by expanding facilities and building roads I think that this type of thinking will lead to further reduction of the wildlife. flora. and general tranquility of the Forest

commodity production is limited by the ability of the land base to sustain such production without detriment. We feel the PRF Alternative provides a balance of uses over time that will benefit the American public

1500 The Sequoia National Forest must undertake a thorough, on-the-ground survey of all aspects of the forest before going hellbent for development Forest personnel know next to nothing about wildlife The amount of money and qualified personnel who gather data beyond timber and grazing is pathetic Before a piece of ground is developed. find out what is there first

In our Judgment. the type and level of detail of information in this Forest Plan is appropriate for this general level of decision making (Note that the Forest Plan makes the basic allocation) Project-specific and site-specific EA's will deal with on-the-ground effects These will be prepared by interdisciplinary teems. including wildlife specialists.

1600 I realize the USPS is under political and time constraints. but that is no excuse when public land is at stake Forest personnel must Step forward and risk careers and livelihood to point out how facts and figures are manipulated to justify a predetermined course of action

We have no response to this expression of opinion

1700 The plan Should include the hiring of specialists in various facets of wildlife. recreation and non-timber. non-grazing fields on a coequal basis with timber and grazing

The Forest Plan is a land allocation and management plan The hiring of personnel is beyond its scope

1800 Monitoring must be very strict and activities such as timber harvesting and grazing must be curtailed or Stopped if monitoring reveals damage taking place

Please see the monitoring plan in Chapter 5 of the Forest Plan We believe this will provide the information required for Sound decisions

1810 'Monitoring and Evaluation", Of the Draft Porest Plan (Alternative PRF) Sect A Purpose Add (as an additional purpose of monitoring) "-ascertain whether appropriate criteria are being used to evaluate environmental impacts " Add (following "-predicting actual costs end personnel requirements ") "-mitigation measures implemented to restore environmental quality " Sect B Monitoring System Add "Regular Management Review presentations shell be open to the public. and shall be published for distribution to interested individuals, groups or agencies " Add (as two additional monitoring programs) "-annual habitat capability inventories and wildlife species diversity summaries " Add (following last paragraph) "-Provision for citizen Involvement" "A Sequoia Forest Management Advisory Council representing the interests of all forest user groups will

The monitoring and evaluation section (Chapter 5) of the Final Forest Plan is the result of a revision in response to public comments to the Draft Plan

Monitoring and evaluation criteria included in the Plan are not intended to be all-inclusive, nor can they stand alone as a measurement and/or monitorlng scheme Complexities. inter-relationships. user demands. political realities. legal requirements. and budget fluctuations require that Forest management and monitoring be flexible enough to respond to changing conditions. additional Information. and new technology

The monitoring plan is designed to measure key indicators in several areas of management or activity over a period of time In addition to the

be appointed by the Forest Sueprvisor " .. Figure 5 1 "Monitoring Evaluation Process" Note that the adequacy of sample size is brought into question only if objectives are not being met (if objectives are met with too few samplse is it proper to proceed?) . Table 5 1 "Monitoring Plan" Add a column labeled "Adverse Impact Monitoring Criteria" Following are some recommended entries in this category Facilities. MIH LO2 and L15 - (Effectiveness of road paractices) Add Impact of roads and road construction, habitat loss, watershed disturbance. noise. dust. user conflicts, etc. Forest Pests MIH P34 - Add Pesticides and herbicide residue analysis On-site. water sources and streams. disposal sites. wherever large quanitites are used or large areas are treated Range. (grazing) MIH DO2 - Add Evaluate range quality before and after seasonal use Report impact on other resources riparian damage. meadow-fouling, introduction of pests and pathogenic organisms, plant losses Recreation - (Note that adverse impact of OHV activity is included in Table 5 1) Timber MIH E06 - Add Short-term impacts effect of logging activity on other users. streams and riparian zones. wildlife. visual resources. soil stability, etc Long-term impacts wildlife habitat capability. species diversity, recreation values, soil productivity, etc Wildlife MIH CO1 - Add: Effects of habitat alteration cowbird parasitism. starling occupation of nest sites. range and distribution changes

actions identified in Chepter 5, there are innumerable reviews. studies. and reports that evaluate the effectiveness of Forest management

Rarely can any single monitoring activity stand alone. they must be evaluated in the context of the effects on both the human environment and natural ecosystems While far from perfect. and in constant need of revision, this complex system helps to make the choices necessary to best meet the purpose for which the National Forests were established

Current laws and policies provide for public involvement. review and monitoring of National Forest Management activities Cooperative programs with user groups. individuals. universities, and other public agencies Provide a constant source of interraction with the public Inclusion of these or additional redundant public review/monitoring/ involvement programs in the Forest Plan would be of little value

We believe that the monitoring and evaluation actions identified in Chapter 5 of the Final Forest Plan. combined with other reviews. measurements, and reports are adequate to assure proper Plan implementation

1900 We need productive lands We need to worry about semi-wilderness areas Such as has been mentioned, Where we would have no motorized traffic We need to worry about areas such as the Moses Mountain are being put into wilderness, the Rock House Basin area and so on We need those areas to be kept in a multiple use-basis along with the rest of the land, but particularly let's worry about the forest-productive land that will provide multiple uses not only for timber but for recreation I Want to point out that timber. like mining and power interests and developments over the past many years. has provided the access needed for all of us to enjoy the forest and to use the forest. and that includes the wilderness users I would like to support specifically the alternative Called the High Productivity 1 believe this will help maintain the productivity of the land and the land base Thanks

We have no response to this expression of opinion other than to note that we have considered these things and feel that PRF provides the best mix of market and nonmarket goods

2000 In summary, adopting the National Forest recommended alternative would result in significant degradation of the Forest's scenic and wilderness values. The only realistic alternative Which would preserve our valuable future wilderness and wildlife heritage is a modified RPA Alternative	We have no response to this expression of opinion Other than to note that in our judgment PRF protects the scenic and wilderness values important to the correspondent Absent greater detail. we cannot elaborate further on this proposal
2100 The Market Alternative provides an acceptable balance of forest products and services, while protecting, to a reasonable degree. the special interests of the more vocal members of the public The importance of maintaining high Output levels of market resources cannot be Stressed enough People Could not get their campers to the campground and backpackers could not get to the wilderness without the roads that timber harvesting paid for The FS needs to be educating the public about deficit campgrounds and wilderness areas. not just deficit timber hales I urge the SQP to choose the Market Alternative	We have no reponse to this expression of opinion
2200 In general. we find the DEIS extremely diffi-Cult to follow The plan deals in such broad terms that it is very difficult to know exactly how the proposed actions will effect our interests at any point in time These generalities are especially difficult to deal with for VRM. range and timber Without a clear definition of the proposed action. it is impossible to assess the impacts	The Forest Plan is a broad land allocation and management plan. it is not a site-specific document Site-specific impacts will be dealt With in project EA's tiered to the Forest Plan Hopefully. our efforts in preparing the Final Plan and EIS have resulted In a more understandable document
2300 In the Amenities alternative, we have leeway. (in the level of timber harvest) which protects us from Murphy's Law or ourselves	PRF also offers plenty of leeway Note that the Sequoia is technically capable of producing 186 MMBP per year The 97 MMBF recommended in PRF in about half of what could be produced if the Forest were dedicated to commercial wood production alone
2400 I wish to mention the physically handicapped. Who number about eighteen percent of our population The Amenities Alternative I favor should reach out and provide opportunites for all of them	Please see the Forest Plan. Chapter 4, Section F "Recreation" Under the Preferred Alternative. construction standards appropriate to elderly and handicapped persons are to be considered during the rehabilitation and reconstruction of existing facilities For any new facilities we are already required to provide access for the handicapped. regardless of the alternative Selected
2500 We found it extremely difficult to analyze the various alternatives with the maps provided. The lack of a map Showing all roadless areas made it impossible to determine the impacts various alterna-tives could have on these wild places	We have added a section to Appendix C of the EIS to facilitate comparison of management emphases in roadless areas We have also added the roadless area boundaries to the vegetation maps

2600 Additional alternatives featuring realistic scenarios are needed

This Statement is so general that no substantive response is possible other than to say we believe we have presented a full range of viable alternatives

2700 I express my concern and alarm regarding the Sequoia NP Proposed Land Management Plan and DEIS I believe that the *90 days* allowed for public eon-sumption & rebuttal is not an adequate time. I request a one year moratorium for the following reasons: A one year moratorium is a realistic request evidenced by the Tulare County Visalia Delta Editorial dated 9/12/1889 In view of this evidence of the past. and the visual present day damaging practices. a knowledgeable citizenry cannot help but be aware of the fact that we are inadvertently being lulled into Self destruction We need an honest re-evaluation period My opinion is that this is a crisis

We feel. based on previous experience with other complex EIS's, that a tot81 of five months is ample time for public *review* *Ordinarily*, a DEIS is published for review for three months. Since our DEIS was published in November of 1985. we added a month to the review period. recognizing that many people would not have time to review the document over the holidays. In response to public request. we added another month to the review period. bringing the total to five months. BY the end of April 1986. we had received about 3.000 letters from the public and public agencies. many of whom gave detailed Suggestions and/or criticism of the DEIS and Draft Plan We feel that Such large response Vindicates our judgement that the review period was sufficient

2800 Inventory management should receive more attention in the Plan The FS has the knowledge that there are large acres of overcrowded stands of merchantable size More attention should be given to evaluating timber inventory management to determine whether changes in present practices would yield greater net benefits to the nation To do this. I repeat the plan *must* have a goal of having competent administrators who are determined to reduce waste and increase production of our renewable resources I respectfully submit that YOU adopt the alternative that has the least social impact on all the people concerned

Chapter 5 of the Plan describes the monitoring needed to assure compliance with the intent and objectives of the PRP Alternative Periodic forest inventories and growth projections are a part of this monitoring job

Regarding minimizing social Impacts. note that by *definition*, the greater the change *from* the baseline condition, the greater the impact Hence, both the AMN and PRO Alternatives would yield the greatest impacts while Selection of CUR would by definition yield the least PRF represents little change with respect to CUR. Please see Chapter 4 B 1 of the FEIS for full analysis.

2900 I support the Conservation Alternative

The Conservation Alternative is addressed in Chapter 2, Section D of the PEIS Individual comments made within the Alternative are dealt With by subject in this Public Response Appendix.

2950 I request that another comparable meeting be Scheduled at least 2 times more and closer to Los Angeles to allow many persons who have this interest to attend and return safely within a reasonable time.

The Forest specifically scheduled a meeting in Lancaster to facilitate participation by Lo8 Angeles residents. This meeting was attended by folks from as far away as Manhattan Beach Overall. the Forest allowed a total of five months for public comment Untold hours were Spent discussing/explaining the documents to people, both in *person,and* over the phone. Overall. we feel the efforts put into public meetings. *hearings, and* other *involvement* was sufficient to allow adequate opportunity for input

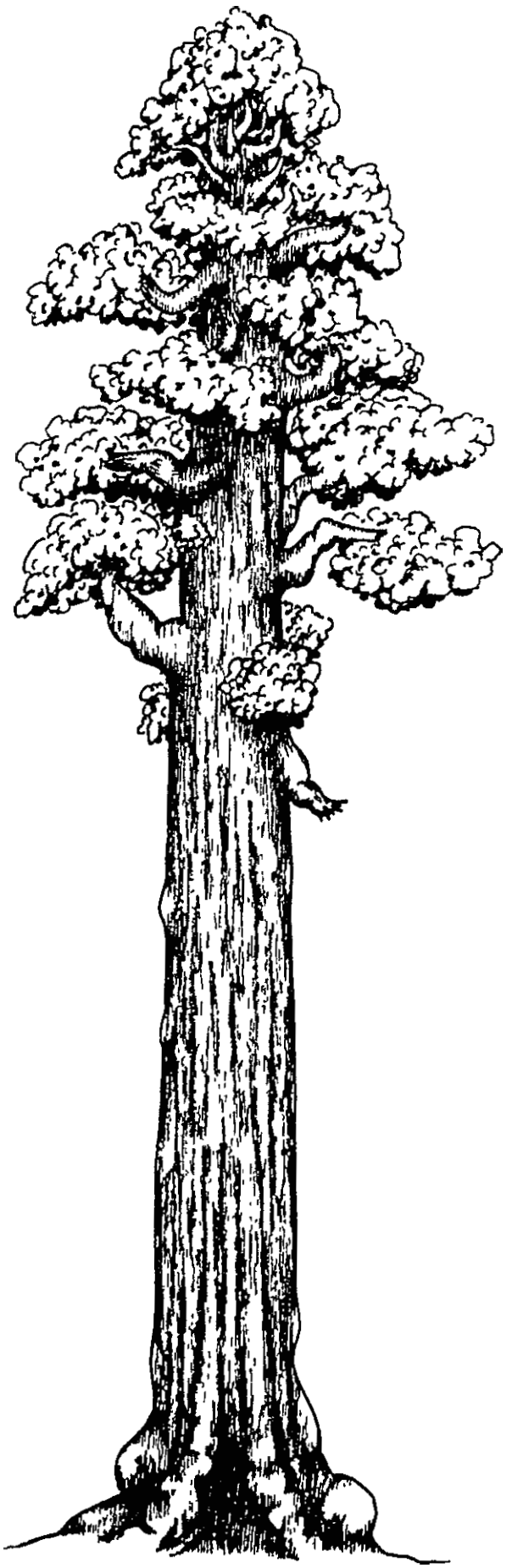
3000 1 am Opposed to the Preferred Alternative/ Proposed Plan.	Changes were made in the PRP Alternative and Plan as a result of further analysis and the more than 3,000 letters received in response to the DEIS and Draft Plan. Refer to the Record of Decision document for the primary reasons for our decision.
4000 Support Low Budget Alternative	We have no substantive response to this expression of opinion
5000 I support the RPA Alternative.	We have no substantive response other than to say that the Preferred Alternative and the RPA Alternative have much in common. Targets for both market and nonmarket resources are relatively close
5010 1 would like to go on record as supporting the Current Alternative (CUR). With a few exceptions. current management of the Forest has been satisfactory and it is a well known system	We hope the Preferred Alternative has improved upon the Current Alternative by adopting a more balanced multiple-use program and offering a better response to public issues
6000 We are particularly interested in your response to the suggestion for the appointment of a citizen's advisory council to participate in the continuing monitoring of the forest plan and in the formulation of any modification steps that are needed	Current Forest Service policy requires that formal citizen's advisory committees be establihsed by the Secretary of Agriculture. and only if specifically authorized by law or in the public interest in connection with the performance of duties imposed by law We view this as unnecessary on the Sequoia NF as it pertains to Forest Plan monitoring A8 discussed in the Plan. Chapter 5, monitoring of Forest activities takes many forms The Plan contains a number of specific activities that focus on the broad aspects of implementation Over the past several years. we have encouraged citizen involvement in various activities associated with the management of the National Forest We will continue to invite public participation in activities such as these As examples of some past activities, members of a motorcycle user group have assisted us in monitoring trespass by motorcycles into wilderness and volunteers have helped us monitor boating activities on the Kern River Recently. we have been actively soliciting assistance to help establish/undertake monitoring activities in giant sequoia groves We will continue to welcome public involvement in this aspect of our Work
6100 We would like you to consider the following objectives in evaluating the Sequoia Forest Plan They are suggested as a test of whether the forest can yield its multiple-use goals and still be passed on in good condition to the next generation 1) Id short, will the allowable timber cut be maintained below the rate of re-growth, and will ski area developers pay a fair price for the damage they	The respondent identifies 6 factors considered to be an adequate test of whether the Forest can yield its maximum multiple-use goals and remain in good condition for future generations Our analysis of these factors lead us to believe the monitoring of our activities. as described in the monitoring plan (Chapter 5 in the Plan). will ensure this occurs An environmental analysis is an integral part of each

inflict on public land? 2) Can you support a comprehensive monitoring and evaluation program . . 3) Can you institute protective management alternatives Whenever necessary to preserve native populations of plants, animals. and birds. if they are threatened by habitat loss or alteration7 4) Can you assure that no major ecological changes will be imposed on the forest unless there are scientifically predictable long-range benefits that will offset the initial disruption? 5) Can you assure everyone who is a co-owner of the National Forests an opportunity to enjoy lands that are forever wild? 6) Can you Protect the integrity of all the forest ecosystems and their wildlife populations against the adverse impacts of forest exploitation? If the answer to any of these questions is dependent upon the availability of funds, then the plan should be held in abeyance until the necessary funding is assured.

project on the Forest. This interdisciplinary review looks at all resources in detail. and Provides for mitigation within acceptable limits. As established by this PEIS (Chapter 2) there are Minimum Management Requirements (MMR's), Timber Policy Constraints (TPC's), Minimum Implementation Requirements (MIR's), and Standards and Guidelines (S&G's) that must be met on all projects. How these MMR's, TPC's, MIR's and S&G's tie to the budget, actual project implementation. and priorities is discussed in more detail in Appendix L of the FEIS. The result of the analysis required. coupled with recognition of management requirements with the results monitored over time will. we feel. be a Forest future generations will appreciate.

12000 Specific Minor Concerns. Classification of the small area north of the Bloomfield Ranch The Wildlife. Fish and Visual Emphasis Alternative (WFV) classifies the management emphasis as number 5. All other alternatives classify this area as management emphasis number 1. Neither of these management categories seems to be appropriate Perhaps S for Special Interest Area would be a solution

Special Interest Area is not an appropriate designation for this small area because it is eligible for none of the special classifications included in the general category Special Interest Area. These classifications include Botanical. Scenic and Geologic areas. To our knowledge. none of these are appropriate to the area you mention Since you give no reasons for thinking the Other designations inappropriate. we cannot respond substantively to your comment.



Section 6 A

Alphabetical Listing of Respondents

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Abraham, Mr. and Mrs. Harry C.	1422
Acevedo, Robert	2208
Adams, Gail	1588
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Adams, Rick	2173
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Adventure Travel Agency - Armida 0. Cardona	2094
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Akawie, Richard	1749
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American Colleges & Universities Studies Ed. Dept.	1454
American Forest Products - Ed Walker, General Manager	1179
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American Wilderness Alliance	2833
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Ashbrook, Roy	2540
Ashburn, Roy, Supervisor First District	1444
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Avey, Wendall	2162
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Bob's Cylinder Head Service - Bobby J. Richardson	1403
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Brough-Stevenson, W.G. & M.	1465
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Brown, Albert A.	1789
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CA Industrial Rubber Co. - Allen Moskowıtz	583
CA Licensed Foresters Assoc. - W.E. Snyder	2766
CA Mining Prospectors Association - Andy DeMetrıff	2722
CA Native Plant Society - James D. Jokerst	2693
CA Reg. Water Quality Con. Board - Sargeant J. Green	2520
CA Republic Bank - Leroy E. Harmon	1173
CA Republic Bank - Phil Lacey	1580
CA Sportfishing Pro. Alliance - Robert J. Baiocchi, Cons.	1362
CA Trout - Stuart Morse	1875
CA Wilderness Coalition - Jim Eaton, Executive Director	2781
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Carlson, Dwight A.	8009
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Carothers. Mrs. Elmer	2272
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Carpenter, Norm	1942
Carpenter, Patricia	1670
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Carris, Jon	1237
Carson, Jean	1425
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Curtis, Larry	2691
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Custom Computer Services - John W. Dodson	645
Cutbirth, Mary	1718
D & D Transportation - Doris & Dave Wood, Owners	2199
D'Alvarez, Rita	2682
D'Anne, Denise	170
D'Antonio, Franklyn	2553
D'Armond, Carol	207
D. Stake Mill, Inc. - Bob Harris, President	2020
Daggett, Veronica	1649
Dague, Dale K.	1377
Dahl, John B.	1060
Daisa. Greg	1813
Daly, Dennis J.	18
Damaniego, Santos	2069
Dames, Mark	1707
Dancer, Norman	2159
Daniel, Alan Dale	133
Daniel, Rhoda	878
Dartt, Florence	28
Darvell, Rosalind	60
Dasbach. Susan	1065
Dawkins. Dennis	216
Dawn, Andrienne	389

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Davies, Jeanne	2302
Davis, Dan	2059
Davis, Denyse	650
Davis, F.H.	1276
Davis, H.H.	1701
Davis, R.C.	999
Davis, Tim A.	2087
Davison. A. Jane	1984
Davison, Carol L.	1983
Day, Chuck	933
Day, Dan	54
De Prosse. Jean	458
Dean, Rhonda	43
Decker, Marla & William	1751
Deep Creek Flyfishers - L. Robert Breeding	1264
Defenders of Wildlife - Richard Spotts	869
Dehart, Kathleen	1685
DeJager, Bill	186
Del Monaco, Michael	29
Del Terra, Inc. Surveying - Douglas R. Bond	584
DeLaCruz, Rick	1907
Delahuntz, Thomas F.	634
Delong. Clifford H. Sr.	1596
DeMasters, Boyd	1996
DeMasters, Derk	1059
DeMers, Douglas	2762
DeMetriff, Andy	2854
Demorest, Harry L.	538
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DeNike, Bob	290
Denmark, Thomas, M.D.	2464
Dent, James E.	331
Dept. of the Air Force	1278
DeSautel, David A.	1759
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Desrochers, Sylvia	785
Deutsch, Lauren W.	637
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Dexter, Garth L.	929
Dhondt. Robert J.	1439
Diamond, Caryn	80
Diaz, Augustine H.	2176
Diaz, Daniel V.	2090
Dickard, Richard	1290
Dickens, Frank E.	928
Dickson, David	1510
Diebolt, S.	561
Diener, Doris E.	2399
Diernisse. C.M.	168
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DiPol, C. John	1513
Dishington, Deborah	2529
Dittmer. Harold L.	2028
Doal, William	1742
Doane, John Murray	160
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Dobbins, Rick	2288
Dodge, Matt	1874
Doerksen Building Materials - B.R. Doerksen	2572
Doerksen. Dan	2666
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Doyel, Ed	2656
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Dranow, Jim	481
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Dubell, Ana	380
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Duckworth, Diane	1956
Dudley, Sarah & John	2606
Duff, Cindy	395
Duggins, Jim	1549
Duhme, Lenore V.	88
Duich. Mr. & Mrs. William H. Jr.	705
Duke, James	1547
Duke, Oscar Jack	1716
Duncan, Lynette	434
Dunlop, K.	1432
DuPont, Chris	1564
Dupree, Mary	8004
Duran, Danny	2109
Duran, Jimmy	1852

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Duran, Manuel	2104
Dutton. Randy	396
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Duxler, Mary 0.	1042
Duysen, Kent	2599
Duysen. Larry	333
Dyer, Melody L.	1021
Eanes, Robert	1815
Eans, Carol	1924
Eccles, Venny	2787
Eck, Randy	1313
Eckenburg, Buzz	601
Ecker. J.F. (Dobbs Tire & Auto Center)	2330
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Edinger, Iris	2811
Edwards, Raymond & David	2566
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Eggen, Brian G.	1370
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Ehni, Ruth	226
Ehrlich, Eugene	688
Eichenberger, Fred	1241
Eisenberg, David F.	500
Eispamer, Edna	1712
Ekberg, Robert	1765
Elander, Ms. Eleanor	1199
Electrical Motor Shop	239
Ellberg, Steven P.	1216
Elliot, Claudia	1281
Elliott, Allison	1782
Elliott, D.L.	442
Elliott, Julianne	998
Elliott, Lee	2417
Elliott, Lisa	2286
Ellis, Emory L.	1756
Ellis, Jeffrey	94
Ellis, Judy	1055
Ellis, Marion L.	1746
Ellis, Stephen	2212
Elmore, Frederick A.. M.D.	1085
Elsing, Elizabeth	1105
Elston, Richard	1611
Ely. Dana & Carol	1814
Elyondo, Leonel	1248
Emmert, Francis	2017
Emrick, George	8
English, Neumal	2752
Equestrian Trails, Inc. Corral1 #56 - Russ Fielder	2785
Erickson, Larry	2062
Erickson, Shari	2488

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ERO Forest Products - Edward G. Rotticci, President	2782
Erskine, Karen	2298
Erskine, Michael R.	1795
Escalante, Hilda	920
Esch, Bruce	1921
Escola, Arthur W.	1081
Eskelsen, Kirby	1101
Espinoza, Fidel	1986
Essary, Steven	501
Estel, Dick	596
Estrada, Fred	1602
Ewell. David W.	2147
Eugene, Ralph M.	1595
Evans, Fay A.	2405
Evans, Joe	550
Evans, Mary Ann	2623
Evans, Vance L.	2089
Eye Medical Center - Richard H. Whitten, Sr., M.D.	1367
Fabbri, Richard	1426
Fabre, Stephen	1077
Facio, Ed	1600
Facio, Geronimo	1608
Falcon, Jim	1894
Falkenberg, R.	790
Far West Forest - Ted Lewis	599
Farmeto, Robert	419
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Faust, Diana	4
Fauth, Gregg D.	2038
Faybert Services - W.H. Svendsen	241
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Federation of Fly Fishers - Martin M. Seldon	79
Federation of Fly Fishers - Paul Collier, Past President	1830
Ferari, Robert	150
Ferell, Carola	942
Ferguson, Mary	786
Ferguson, Thomas S.	765
Ferguson, Tom & Denise	2465
Ferlitsch. Gordon	1836
Fernbaugh, Neil	1566
Ferrell, C.	751
Fey, R. Walter	8010
Fiduk. Stephen J.	559
Field, Judith	138
Filtenth. Kenneth D.	1722
Finch, David & Nancy	690
Fink, Walter M. "Dyk"	642
Fischer, Shirley	1475
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Fisher, John M.	1498

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Fleck, Beverly	8053
Fleeman, Kenneth W.	1626
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Foelsch, Richard A.	2419
Fols, Albert C.	2587
Fontaine, Joe	2856
Foppiano, Louise J. - Louise J. Foppiano Winery	849
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Franklin, David	281
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Freeburn. Joyce K.	1172
Freeman, Leroy	2047
Freeman, Nicholas	2102
Freeman, Phillip	2305
French, Barbara	1050

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Fresno Muzzle Loaders - Wayne and Donna Johnson	254
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Friends of the River - Beatrice Cooley. Ph.D.	2413
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Gamble, Gary L.	819
Gamboa. Phyllis	1464
Garcia, Javier B.	8031
Garcia, Joe	2110
Garcia, Norman L.	871
Garcia, Reynaldo P.	1848
Gardner, Bill	2137
Garner, Gene L.	1557
Garrett, Valery	2119
Garris. Barbara	741
Garrison, Lee	1819
Garrison, Steve	2046
Garza. Fernando	2328
Garza, Oscar	2085
Garza. Ray	2185
Garza, Raymond	2010
Gates, Robert A.	2714
Gaudreau, Jean & Barbara	801
Gawdy, Miriam. R.D.	1045
Gault, Joy A.	2078
Gauthier, David	8086
Gaydos, Beth	2246
Gear, Jerry	1941
Geier. Walter J.	1539
Geisler, Dorothy	799
Geistlinger, Mark J.	2589
Gelenaw, Greg	2013
Geller, Alix	388
Geller, Ron	960
Gendron. David	822
Gendron, Gerard A.	2687
General Hauling - Ron Lopopolo	261
Genes, Dean M., M.D.	1314

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Genes, Jim	1350
Genes, Milton	1401
Gent, Brad	2004
Georgeon, Robert	1151
Gerber. Terry	839
Gerlinger's - Morgan Orwig, President	946
Gerton. Les	632
Gerwig, Maureen & Michael	1483
Gervais, Richard	802
Giam, Ernest	1224
Giampaoli, Bruce	2637
Gibble. Rocky	1999
Gibson, Bill	2863
Giesbrecht, Willie	1846
Giesking, Shirley Jo	440
Gilbert, Merritt	2749
Gilbert, Penny Lee	402
Gilbert, Sam	860
Gill, Cathy M.	1414
Gill, Dr. June M.	1466
Gillespie, M.	2249
Gillespie. Robert	2429
Gilliam, Scott D.	2214
Gimbrett. I.M.	2794
Gimbrett. Iris	1778
Gingell, W.E.	1097
Girard, Karen	2260
Girl Scouts of America - Mary Pagliaro	2728
Glandon, Charles L.	2052
Glanzer, Chris Mark	8036
Glaser. Stan	46
Glass, Jerry	985
Glatt, Lesley E.	8024
Gleckler, Kay	2401
Glenn, Jeff	1771
Glover, Carla	1725
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Glover, George	2385
Godwin, Gary M.	1637
Golde, Paul	283
Golde. Shiela	378
Golden, Charles	422
Golden, Greg	959
Goldfarb, Ron	654
Goldsmith, Kenneth	8073
Gomes, Lowell	2611
Gomez, Lucia	1917
Gomez, Manuel	1904
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Gonzales, Gilbert	2222
Gonzales, Israel	1885
Gonzales. Joe M.	8050

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Gonzales, Louie	1623
Gonzales, Rudy A.	1562
Gonzales, Sal	2092
Gonzalez. Israel	1628
Gonzalez, Mario	1271
Gonzalez. Michael A.	1646
Gonzalves. Gary	1884
Goodwrick, Sandy	456
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Gorman, O.F.	1005
Goshgarian, Kathleen	1155
Gottlieb. Norman A.	1046
Gottschlich. Douglas	2231
Gould, Diane	792
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Graham, David M.	2812
Graham, James	830
Grant, Carole	61
Grant, David W.	917
Grant, Kimberly	35
Grau. Sarah	2143
Graves, A. John	2355
Graves, Bonnie L.	940
Graves, Kim	2568
Gray, Diana	2349
Gray, Ken	2230
Gray, Rod	1142
Graylift - John L. Waugh, President	8054
Green, Darrell L.. Inc.	8003
Greening, John	1193
Greer. Bob	2339
Greer, John	1928
Greer. Kenneth E.	2311
Gregg, Mark	1906
Gregory, A.W.	1336
Gregory, Charles & Mary Ann	2658
Gribble. Nancy	2388
Griese, Dave & Cathy	2696
Griff, Padraic	376
Griffin, Mary J.	1364
Grimes, Keith W.	791
Grinsteiner. Ron & Vi	2721
Grisedale. Grant E.	1690
Griswald, Lisa G.	1152
Grober, Muriel	1040
Grode. Jackson	215
Groh. Edith	2636
Grossman. Avram	89
Grossman, Leah	782

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Grote, Curt	772
Grote. Laurie	1495
Grote, Margaret & George	492
Groves, Donny W.	1246
Gruenther, Romel	143
Guenen, Linda Leon	414
Guenther, Ron	2840
Guernsey, Richard D.	1277
Guerrero, Linda Leon	589
Guil, Michael F.	2224
Gunderson, Camella M.	2685
Gura, Meryl	1032
Guros, Francis	1163
Guterrel. Jesse	2487
Guthrie, Elizabeth M.	463
Guthrie, J. Less	1768
Gutierrez, Mike	1548
Gutnick, Beryl	110
Guy, Mrs. Rohilah	8064
H & W Tractor Co. - William Hunsaker, President	1122
Haas, Ava M.	1452
Haase - G.W. Zehender	2648
Hackett, Marcia C.	816
Hackett, Rosemary	85
Haddon, Kristina	1132
Hafenfeld Ranch	139
Hagen, Mike	2650
Hagen. Robert	1995
Halcraft, Jeanne	1953
Hale, Blaine A.	2154
Hall, H.B.	2423
Hall, Robert J.	2011
Hallman, B.	1149
Hallmeyer. Joe	2511
Halstead. Hope	2559
Haltz, Suzanne	369
Hamacher. John	2509
Hamacher. John B.	2723
Hambly. Cindy R.	383
Hamilton, William H.	1121
Hammond, Felicia	1124
Hampoyan, Helen	1559
Hancock, Barbara J.	304
Hancock, Frank L.	1952
Handelman, Carol R.	1572
Hanes. R.O., Jr.	1888
Hankin, John	2859
Hannah, Lynne	770
Hanner, J.E.	34
Hanralan, Tom	759
Hansen Logging Supply - Hans L. Hansen, Owner	2076

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Hansen. Mark	604
Hansen, Robert A.	876
Hanson. H.E.	1369
Harbothe. Jerry	2060
Hard, B.R.	452
Harder, Charles J.	1148
Harding. Evelyn	151
Hardy, David A.	1678
Hardy. James	972
Hardy, Joanne	1683
Hardy, Paula G.	450
Hare, David Wayne	2218
Harper, Enid	744
Harper, Monte C.	2532
Harr. George	436
Harris, Caryl E.	727
Harris, Janet Vierra	8055
Harris, Jon	1227
Harris, Keith S.	671
Harris, Maria	661
Harris, Pam	1763
Harris, Sid	2810
Harrison & Bonini. Inc. - Robert L. Scholzen	1382
Harrison Equipment Co., Inc. - Joe E. Harrison	1234
Hart, Margaret	2117
Hart, Stanley	1388
Harter. O. Clyde	1958
Hartleb, Dorothee	68
Hasler, T.	743
Haston, L.M.	1355
Hawker, D.D.	483
Hawkes, James	2248
Hawkins, Cole	2678
Hawkins, Lee C.	1841
Hayden, Anne K.	1661
Hayes, Anita	49
Hayes, Cathy	2668
Haymond, Beth	274
Hays, Debra	2426
Headly, Jacqueline M.	81
Hearn. J.J. Logging & H & M Logging, Inc.	2460
Hearn, James J.	1944
Hearn. Oma Lucille	2459
Hedge, Judy	446
Heebner, Gordon	1770
Heels, Linda	656
Heffner, David L.	2643
Heflin, Beth & John	2293
Heflin. Elizabeth Ann	2201
Heflin, James L.	2203
Heil, Randy	1809
Heimichs. Eddie L.	2180

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Heimler, Jim	708
Heindl, Wayne M.	1476
Heinemam. Earl & Helen	2450
Heinemann, Mr. and Mrs.	2449
Heirndahl. Mrs. Esther	938
Heleniak, Jim	2594
Heller, Beate, D.C.	53
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Helm, Brad	2000
Helmick. Bobbie	2347
Helmick, Ken	2373
Hemingway, Clarie	485
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Henberger. John	970
Hench, James	1190
Henderson, Barbara	406
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Henry, Ronald A.	2799
Henson, Lee	2836
Henson, Roy L.	2763
Hepperle, Charles	1228
Heritier, Richard 0.	2842
Herman, Jim	620
Hermann, John	2206
Hernandez, Alvin	2378
Hernandez, Anita	8049
Hernandez. Cat	2324
Hernandez, Dino	1627
Hernandez. Frank P.	1541
Hernandez, Hector E.	1918
Hernandez, Jess	1866
Hernandez, Mike	1950
Hernandez, Roman	1638
Hernandez, Sam S.	2588
Herrera, Barry	2066
Herrold, Mark	2033
Herry, Mary AM	2683
Hershberger, John	763
Hescock, Gayle A.	1561
Hickinbotham Bros. Ltd. - Ralph Hickinbotham	582
Hickman's Service - Tom Hickman, Owner	1514
Hicks, Ernest M.	1366
Hicks, Robert	817
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Higgins, David	1041
High Seirra Stock Users Assn. - Charles Morgan	2476
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Hightower, Bob	156
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Hill, Bobby G.	572
Hill, Lennie	1240

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Hill, Mark & Diane	2397
Hill, Martin & Neva	697
Hill, Ted R.	1348
Hilsson, E.	539
Hinemann, Wayne	8005
Hines, Michael	1286
Hines, Roy	2331
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Hiniberger, Vince	71
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Hinojosa, Cesarin	2727
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Hoffman, E.	447
Hoffman, Harold	2218
Hoffman, Herman & Dolores	1272
Hoffner, John	1180
Hogarth, William F.	1002
Hokanson, Dr. Jerrold & Dr. Carolyn	522
Holden, G.	2097
Holinbeck, Genevieve W.	1883
Holinbeck, Scott A.	1911
Hollins, Ms. Judith	278
Hollis, Bob L.	2535
Holly, James C.	1614
Holmes, Robert A.	36
Holstein, Diane	449
Hondo Chemical. Inc. - Bruce R. Baker	700
Honea, R.	981
Honig. Andrew & Sasha	1208
Hooper, Mr. & Mrs. Jack G.	2392
Hoover, Vicky	719
Hoover, Wayne	412
Hopkins. (Mrs.) Jane	505
Hopkins, Barbara	1730
Hoppas, Arvid G.	2238
Hopper - Gary Hull	1211
Hord, Stephen Y.. Jr.	531
Horn, Ted H.	66
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Horner, K.	1424
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Horsley, Wesley H.	1925
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Howard, Mr. J.R.	2437
Howard, Patt	1702

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Hovater, Earl D.	2425
Hovck. Kathryn	2609
Hubacek. Richard	1571
Hubbard, Robert	1632
Huber, Mike	2048
Hudson, Rex R.	953
Huebert. Scott	2323
Huettner, Beth Ann	1486
Huff, Daryl	77
Hughes, Edward F.	627
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Hughes, Nelson	2321
Hulberg, Larry W.	445
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Hunter, John	2152
Huntington, Kim	890
Husar, A.	1236
Husband, Lynn	796
Hustand, Kathryn L. and Neal Miller	2823
Hutchens, Cecil	2024
Hutcherson, J.R.	944
Hutchings, Rodney	2054
Huth, Gary	2461
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Illegible Last Name - Gabriel	608
Illegible Last Name - Gregg E.	2348
Illegible Last Name - Jack R.	372
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Illegible Last Name - Jeff	2021
Illegible Last Name - Jeff	2539
Illegible Last Name - Margaret	1499
Illegible Last Name - Michael	1900
Illegible Last Name - Mike	1930
Illegible Last Name - Peter	374
Illegible Last Name - Robert	1967
Illegible Last Name - Ron	2342
Illegible Last Name - William	1123
Illegible Name	103
Illegible Name	115
Illegible Name	409
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Illegible Name	987

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Illegible Name	990
Illegible Name	1144
Illegible Name	1800
Illegible Name	1859
Illegible Name	1955
Illegible Name	2577
Infante, Raymond	8045
Inglewood Fly Fishermen - Ben Lindner, Past President	1831
Inglewood Fly Fishermen - Milt Huber, Past President	1828
Inglewood Fly Fishermen - Steve Thompson, Past President	1829
Ingraham, Blake	1229
Ingram. James	1579
Ingram. Mrs. Andrea	2576
Inovec - Ala Al-Bazzaz	1305
Inskeep. William	320
Inyo Co. Board of Supervisors - Robert Bremmer	1948
Inyokern Chamber of Commerce - LeRoy Marquardt, President	1540
Irwin, Tom	1258
Irvie. Don	2428
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Ivie. Dave	2183
Ivie, Kay	2424
Ivie, Larry	2329
Ivie, Tami	2335
Izett, James C.	1070
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Jackson, R. Allen	1834
Jacobs, Ava	1478
Jacobson, Barbara B.	1069
Jad Canning Foundation - Bill Canning	2706
James, Don (Family)	122
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James, Fred S. & Co. of OR - Donald L. Stathos, Sr., V.P.	1212
Jameson. Catherine	2398
Jansky, Marlene	510
Jarosh, John P.	838
Jemetz. Irene	684
Jenkins. Keith	1705
Jenkins, Ruby Johnson	2262
Jenkins, William	2663
Jenks. Felicia	685
Jensen. Douglas B.	196
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Jewish Federal Council of Greater L.A. - Leanne Schy	575
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Johnson, M.C.	2457

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Johnson, Mary	619
Johnson, Mrs. Ray	1435
Johnson, Nancy	859
Johnson. Newell	907
Johnson, Norman	282
Johnson, Paula M.	462
Johnson, Ray	1056
Johnson, Rebecca	1666
Johnson, Richard L.	874
Johnson, Robert Paul	2299
Johnson, Teri	2391
Johnson, Vernor, MA, CCCSP	1284
Johnston. David J.	1280
Johnston, John	42
Johnston, Mark	1323
Jolin, Norma	1518
Jones, Bethany	243
Jones, Betty L.	2233
Jones, Bill	2680
Jones, Bruce & Mae	683
Jones, Deirdre	2613
Jones, Franklin P.	1023
Jones, Herbert A.	163
Jones, Larry	2590
Jones, Pamela Kay	1090
Jones, Robert	469
Jones, Ron	295
Jorgensen Batteries, Inc. - Donald F. Jorgensen	524
Juarez. Gilbert	1915
Jund, Mike	1446
K & M Industries, Inc. - Steve Morgan	1295
Kabisch, Sally	2801
Kadrlik, James T.	2531
Kahley, Mrs. Teri	2534
Kahonn, Bruce	2283
Kaiser, Robert	1116
Kalender, Brenda	2336
Kallsen, Craig	2360
Kamendrowsky. Victor	1799
Kamenski, Robin	2120
Kamisher, Gary	222%
Kamline, Dale	1185
Kamp, Dr. David A.	2279
Kann, Judy	213%
Kanne, Bob	1128
Karlan, Sheldon J.	1837
Karren, Richard K.	1447
Karrs, David	347
Kaster, Olin & Ginny Reid	649
Katzen, Herbert	1100
Kawasaki Motors Corp. - Lee Rodgers	328
Kauffman. Jerry	2357

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Kaufman, Roy	2375
Kaufman, S.A.	1252
Kaufmann, Jacquieline	2387
Kauwoh, Nicolas L.	2332
Kay, Rusty and Associates, Inc.	291
Kehl, Dwayne A.	2481
Keller, Allan C.	1031
Keller. Chuck	1408
Kelley. Barbra	2253
Kelley, Robert J.	1267
Kelly, David W.	2754
Kelly, Phil	2314
Kemp, W.L.	1963
Kempf, Dale	2275
Ken's Stakes & Supply - Joe Hallmeyer. Owner-Mgr.	1633
Kendall, Harriet	1635
Kendrick, Floyd	2354
Kenney, Ed	1755
Kenngatt. Ray	686
Kenny, William	1440
Kerman Bearing & Supply - Wallace C. Thomson	132
Kern Audubon Society - Sharen A. Moon	2770
Kern County Cattleman's Association, Inc.	2205
Kern County CNPS - Diane L. Mitchell	2468
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Kerncrest Ch. National Audubon Society - Donald W. Moore	2694
Kerr, Marion	1736
Ketchum, Robert Glenn	1156
Kim. David	2239
Kincain, David J.	8018
Kinde, Robert	2729
King Bearing, Inc. - Jerry D. Brock	558
King Bearing, Inc. - Larry Stanfield	1339
King Ranch Enterprise - Janelle Guynes	2688
King, Burt	2080
King, Don	2316
King, Harold	1230
King, Harold E.	1973
King, Holly	1107
King, Jerry	2006
King, Jim	1785
King, John A.	2326
King, Margie	1312
Kings Co. Board of Supervisors - Dominic Faruzzi, Chairman	1481
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Kings River Water Assocation - Norman B. Waldner	154
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Kirmer. Michael M.	2517

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Kislink. Amy	923
Kitchell. Kenneth	2056
Kitz, Jo	1334
Klamath Machinery Co. - N.L. "Hap" Hanson	865
Klein, Judy	629
Knauft. Charles F. III	1259
Knight, Timothy E.	1052
Knoy, Jack	2150
Koch, Bill & Marti	879
Koenig, Neil N. Ph.D.	271
Kohl, Will	293
Kohn, Nancy	598
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Kolb, Miriam G.	1379
Koluvek. Linda	1485
Kopp, Audrey	969
Kopp, Greg	769
Koran, Bill	1202
Kordick, Jerry W.	1502
Kozuki, Mits	623
Kramer. Tom, Professor Pierce College	1747
Krase, Robert	663
Kratky, Bob	1550
Krein, Marvin	1663
Krieg, William M.	362
Krisman, Esther	630
Kritzer, Sherry	1329
Kroeger. John	286
Krohn. Jeffrey C.	1419
Krohn, Robert F.	1659
Kroniss, M.S.	1458
Kruger, David	1048
Krussow. V.	251
Kubo, Robert, DDS	810
Kuekes, Tom	1808
Kuhn, Gloria F.	1680
Kuhn, Lidia Manson	730
Kunze, John	1243
Kuropat, Dale	2369
Kus, Ernest	1821
LA. Inc. - Jim Livermore	2649
Labor, James D.	943
Labrado, Rosario	1966
Ladd, Christopher	2327
Ladd, Jimmy	2101
Laden, William J.	2834
Lahay, Mr. & Mrs. R.P.	798
Lahmeyer, Philip M.	2300
Lalanne's, Inc. - Gary Lalanne	734
Lamaga. Betty	1674
Lambert, Michael Eldon	1793
Lamborn, Celia	306

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Lamborn, Jane	905
Lamborn. Lin	885
Lamborn, O.E.	828
Lamond, Robert	1127
Landesman, Dov S.	908
Lane, Linda	1310
Lane, Bob	8042
Lang. Michael	2730
Langberg, Steven	1047
Langer, Ernest S.	858
Lapp, Carl	1827
Large, John	1496
Laris, Emily and Carlos Daniel Fuster, M.D.	1198
Larsen, Darrell R.	2660
Larson, Chris	837
Latchford-Gilpin,Arra	1102
Lattin, Edward R.	415
Laughlin, Sheila	1028
Laughter, J.M.	988
Lawrence Tractor Co., Inc. - Don Nipp	1371
Lawson, Elaine S.	1171
Lawson. Stacy L.	1512
Lavers, Diedre	2537
Lazare, Michael	466
Leager, Gerald E.	8001
Leaky, Bob & Carol	2440
Lederer, Helen	503
Ledford. F.K.	2579
Ledford. Louise M.	2051
Lee's Service, Inc. - Ben R. Huebert	245
Lee, Brian	2622
LeFerer, Susan	2764
Legnis. Timothy	2438
Lehan. Beverly	453
Lehnerz, Bruce	2737
Lein, Larkette	535
Leland, James	897
Lenderking. Hollis	553
Leonard, Adair	16
Leonardi, Cora C.	1000
Letkowitz, David	613
Lewis, Cheryl	430
Lewis, Dan	866
Lewis, Don, Lynn, Jasen. and Seth	2638
Lewis, Linda C.	2564
Leveron, Louis, Ph.D.	989
Levine, Dick	1161
Licon, Eloy	2106
Lierman, Trudi	15
Ligman, Joe	1656
Lima, Clarence	831
Lincourt, Susan	892

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Lindquist. DiAnn	803
Lindsay, Bob	1471
Lingo, Charles & Angela	287
Linnett. Barry James	1380
Linney Associates - Doug Linney, President	1214
Lipman, Bernard W.	1381
Lippman. Peter I.	1053
Little, Charlene	2264
Little, Ted & Robin	2629
Llewellyn, Thomas	1772
Lloyd, E.R.	1429
Loamn, E.C.	1855
Locanthi. Mrs. D.	1188
Lockwood, Marian	742
Lodge, Joan	1027
Logan, John H.	490
Lohse. Gene R.	1487
Lohstorfer, C.	1049
Long, Frank	1687
Long, John R.	423
Long, Mike	1835
Longueville, Keith	1639
Lopez. Alan	1095
Lopez, Jose	1643
Lopez, Martin	8047
Lopez, Richard	2111
Lord, Gerald	1842
Lorme, Raymon G.	2667
Lowe, Al Associates - Albert W. Lowe	1396
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Louisiana-Pacific - James Badalich	308
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Lown. Dorothy M.	864
Lovelady, Don	1787
Loya, Margee	807
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Lucas, Merwin	1255
Lumbermen's Underwriting All. - P.D. Breckenridge	1316
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Lundy, Susan Richardson	544
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MacDonald, Ms. Maren	534
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Machen, Corinne	1711
Machida, Toru	1592
Mack, Darrin	2524
Mackintosh, Susan	1671
MacLeod, John	1397

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MacPhail, Deanna	1761
MacPherson, Rod A.	853
Macris, Alice	1720
Maddock, John	382
Maddox. W.R.	367
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Madera District Chamber of Commerce - Val Chute	312
Madgic. Mr. & Mrs. Robert	625
Magargle, Clarence, Jr.	2522
Magarian. Linda	2215
Magee, Chris & Michael	2236
Mahoney, Carol Maureen	2578
Maida, Nino	2822
Maitia. John M.	2772
Maki, Kurt E.	25
Mandl, William	75
Manfredi, Marie	872
Mann. Bob	2130
Manning. Ann	2402
Manning, John	1337
Manning. Ray	2216
Manson, Leonard	2379
Manville Service Corporation - J.D. Taniguchi	1197
Mapes, Pete & Melba	521
Marcus, Laurie	2202
Mardirussian. Karen	140
Marhenke, Ronald L.	1575
Marin Conservation League - Roger Hooper, President	1581
Marin Conservation League - Willis A. Evans	2767
Maris, C. Vic	2741
Marlee Company - Martin L. Szoke	511
Marsh, Johh T.	956
Marsh, Lisa Ellen	97
Marshall, Helen	707
Martens Chevrolet & Oldsmobile - Jerry Martens	2026
Martin & Stone Ranch - Mary E. Stone	1650
Martin, Amy Jo	93
Martin, Duke P.	775
Martin, Floyd J.	507
Martin, Gary R.	805
Martin, George P.	2284
Martin, Kay	148
Martin, Luella	710
Martin, Michele	513
Martin, Phil H.	1192
Martin, Richard	2068
Martina, John G.. M.D.	169
Martinez, Dan	2338
Martinez, Edward	1645
Martinez, Joe M.	8027
Martinez, Nick	1734
Martinez, Rosendo	961

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Martinez, Wally	1980
Marting, Felix C.	1776
Marts, David	1816
Mason, Dale	1391
Mason, John A.	167
Mason, Larry	276
Mason, R.A.	2837
Mason, Tod	2778
Mathias, Marissa L.	771
Matsinnion, Neil	1945
Matthew", S.	381
Matthews, Shawn	1441
Matthiesen, Jackie	1933
Matulavich. Peter	1896
Maury, Elizabeth H.. Ph.D.	1141
Mautz. William Johnston	14
Maxwell, Evelyn V.	891
May, N.	911
May, Richard H.	2442
Mayer, Barry S., M.D.	191
Mayer. David	2091
Mayer, Jerry	2186
Mayer. Miss Ursula	1449
Mazar, Marjorie L.	729
McAllister. Barb	1731
McAllister, Olga	1741
McBrid, Matt	1044
McBride, W.	614
McCain, Ed	1139
McCann, Rosa	1818
McCarty, Chris	2287
McClain, Karen	1788
McClintock, Scott	2175
McCloskey, Robert	895
McConnell, Vickie K.	1318
McCorhee, Dorothy	240
McCorkle, Dorothy	2291
McCormick. H.R.	1726
McCormick, Keith	2337
McCowan, Jim Jr. & Kaci	194
McCoy, JoAnne	1003
McCray, David E.	2645
McDaniel, Sandy	8063
McDonald, Calvin E.	1853
McElhiney, Paula	2125
McFarlan, James E.	1781
McFarland, Rick	459
McGregor, Robby	2163
McGuire, Charles	2480
McGuire, Todd	766
McIntire, George M.	2219
McIntosh, Cheryl	1162

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McKee, Robert & Loretta A.	740
McKendry, Liz	444
McKenzie, Doug	405
McKenzie, Mark	1823
McKeon, Timothy	2445
McKey, M.	2552
McKinney, Thomas G.	2672
McKinty, C.D.	1420
McLaughlin, Robert J.	289
McLemore, Neal	2095
McLeod, Jack	2554
McLeon, Kenneth R.	2432
McMahon, Mr. & Mrs. John	603
McMillan, Ann	1332
McMurtry, Jeff	8039
McMurtry, Victor	2019
McNally, Pauline M.	252
McNeil, Ken	1455
McNutt, Roland	149
McParland, Robert A.	1533
McQueen, Bonnie	2560
McReynold, Dean	1913
McReynold, Steve	8046
McReynolds, Carl D.	2268
McReynolds, Leon	2045
Meade, Martin J. (Family)	1233
Mecchi, D.H.	605
Mecchi. Peter H.	1965
Medina, Brenda	1959
Medina, Mrs. Renita	2344
Meek, Stephen L.	520
Mefford, Menielee	44
Melendy. Byron L.	724
Melenurez. John	1576
Melvan, Brian	2547
Mendoza, Frank	1908
Meng. Noraine	2352
Mericle. Kathy	826
Merrill, Barbara	438
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Messick, G.A.	2751
Messick. Leroy W.	2733
Messick, Steve	2719
Metzler. Mat	894
Mewning, Kurt	1497
Meyers, Stephen	182
Meza, Raymond	2049
Mid-Cal Ford Trucks - Mike J. Deis	244
Mid-Valley Dist., Inc. - Richard Porter	666
Middlemiss, Terri & Edward	2421
Milberger, Arthur	612
Miles, A.D.	976

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Miller Logging - Lawrence Miller	1490
Miller, Canae	2686
Miller, Chris	2044
Miller, E.L.	2022
Miller, Jeff	1094
Miller, Jim	1960
Miller, John	197
Miller, Jon	2689
Miller, Larry W.	1740
Miller, Louise M.	1574
Miller, Marianne	962
Miller, Martha	2396
Miller, Roy	1088
Miller, Susan D.	1253
Millon, Martin H.	2070
Mills, Larry E.	1287
Milnken, David	787
Miranida Family	1016
Mireles, Larry	1784
Miropol, Norma	1136
Miska, V.	1037
Mitchell, Rick	123
Mize. Donny	1247
Mize, Gary	8043
Moc, Marnie	1043
Moeller, Glenn	914
Molle, Bud	1456
Moncsko, George E.	1715
Monson. Cara & Robert	1137
Montecito - Sequoia - Virginia C. Barnes	2497
Moore, Janice	836
Moore, Roy	2406
Morales, Israel	8026
Morea, Rodney M.	1594
Morehead, Iva J.	1279
Moreno, A., Jr.	1508
Morey, Kathleen M.	1169
Morgan, George L.	1990
Morgan, James	1505
Morgan, Jerry	1909
Morgan, Rob	2333
Morgan, Warren	1898
Morgenson, Randy	804
Moritsch, Barbara	233
Morris & Knudson Co. -Tom McKee, Prof. Eng.	2513
Morris Saw Works - Marlin Morris	263
Morris, William	1890
Morrish. Kendric Bradford	1133
Morrow, Mike	213
Mosher, Mike	2204
Moss, Esther	713
Mottola, Phyllis	2748

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Mount, Robert B.	868
Moy. Mary	2690
Moya, Joe T.	2129
Mt. Whitney Guide Service	2831
Mueller, Mrs. M.	2122
Mullane, Pat	951
Mullane, Sharon	1324
Mullen, Philip G.	1160
Mullenbach, Robert J.	1769
Muller Irrigation, Inc. - Paul J. Cochran	193
Muller, Raymond	2500
Munnell & Sherrill. Inc.	665
Murphy, Bob	2296
Murray, B.A.	2523
Murry, Jack	232
Muschuer, Ed & Dorothy	2581
Musgrave, Mr. & Mrs.	348
Music & Sound Design - Leonora Schildkraut	225
Mussman, Marc	975
Myers, Janice L.	319
Myton, Marc	299
Nadaier. David	2116
Nagle. Lloyd W.	451
Nakashioya, Howard, M.D.	1062
Nanez, Gilbert N.	1552
Nash. Bert	1412
Nash, C. Scudder	1978
Nash, Susan	704
National Audubon Society - Glen Olson, Western Reg. Office	2774
National Parks Cons. Assoc. - Russell D. Butcher	808
National Timber Faller's Association - Bill Bailey	326
Native American Heritage Commission - John D. Smith	360
Nauobilski, Bea	1153
Navarro. Daniel E.	2073
Navarro, Donald Gene	1957
Navarro, Victor	1629
NE CA for Wilderness - Greg Emerson	2771
Neace, David	945
Neely. Richard H.	1563
Neely, Thomas K.	1482
Nelson, Don	2178
Nelson, Erma	2633
Nemeth. Marilyn	72
Nesmith. David	8059
Newland, Thomas	2374
Newman, Jerry	2394
Neumans, Carol	514
Newsom, William A.	1492
Newton & Sons Real Estate - Karl L. Newton	1374
Newton Bros. - Patrick W. Newton	821
Newton, Brian	1556
Newveer, H.	1187

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Nicely, Maxine M.	1010
Nicholls. Sabrina	448
Nickell. John	2860
Nickell, Roger	2862
Nickerson Lumber & Plywood Corp. - Robert Lopez, President	1181
Nicoll, John W.	2616
Nilsson, Ms. E.	1308
Nipp, Gordon & Eva	2467
No Name	882
No Name	983
No Name	984
No Name	1625
No Name	1912
No Name	1936
No Name	1988
No Name	2313
No Name	2485
No Name	2538
No. CA Council Federation of Fly Fishers - Richard Izmirian	1468
No. CA Log Scaling & Grading Bureau - K.L. Stayton	2435
No. Fork Chamber of Commerce - Don Dierberger, Director	1291
No. Kern Property Owners Association - Lorna Charlton	349
Noftel, C.	884
Noli, Bill	768
Norby Lumber Co., Inc. - John Norby	2472
Norcal Electric Supply - Roger W. Higgins	955
Norco Windows, Inc. - Stewart Lemke	8021
Noren. Edward, M.D.	2414
Noren, Mary E.	2415
Norris, Frank	2796
Norris. Larry L.	211
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Nourian. Gaizak	1389
Nuban, Carolyn	932
O'Brien, Chris	431
O'Brien. Gene	1519
O'Brien, Gerald E.	2447
O'Brien, Michael M.	22
O'Connell, Daniel	371
O'Connell, Robert	2492
O'Neill, Edwin R.	2030
O.B. Zuzum Tire Service - Dirk Nuzum	206
Oakeshott, Jeanne	161
Obeso, Mateo	1810
Ockershauser, Kris	648
Office of Student Affairs - Steven Coutre	523
Office Overload & Printing - Ellie Ruppender. Owner	1404
Ohland, Andre	835
Oldham, Charles	2057
Olivares, Patricia	2023
Oliver, Earl D.	2282
Oliver, Jimmy Joe	58

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Olmos. Domingo	2071
Olsen. Bruce M.	1977
Olson, Butch	234
Olson, Mrs. Angela L.	262
Orio. John D.	1014
Orr, Brian & Doreen	2489
Orr. Jeff & Linda	375
Orthman Sales & Service - Charles E. Peters	533
Ortiz. Elizateh T.	37
Ortiz, Octavio	2478
Orton's Equipment Co. - David Orton	1296
Orty. David A.	1791
Orvis San Francisco - Emil Gercke	1738
Orvis. Marian B.	137
Osa, Matt	2713
Ose. Max	1220
Ostergard, Jeff	1530
Otleman's Packaging - Kenneth E. Otleman	1321
Owens, Gene H.	600
Owens, Suzanne	433
Outdoor Adventures - Robert J. Volpert	345
Paananen, Naida	1146
Pace, Robert L.	1880
Pacific Fluid Systems - Stan Nelsen	715
Pacific SE Forest Products - Donald Crane	2521
Pacific/Hoe Saw & Knife - William R. McKillip	1084
Pack, Sue	1577
Padilla. James	1537
Page Equipment Sales, Inc. - Louis A. Wilson	494
Paige, Victor	2471
Palm, James A.	2516
Palmer, Daisy W.	1717
Palmer, Dean	518
Palmer; Robert N.	852
Palmer, Ron	2358
Palmieri, John	566
Paloma, Stephanie	2244
Paolini, Mario	265
Paradis, Kathleen	56
Paramont Supply Co. - Craig Erickson, Manager	1347
Paris, Lois L.	776
Park, Irene M.	8011
Parke. Jeanette F.	253
Parker Trucking - Donald & Janet Parker	2720
Parker, Paul	2393
Parks, Martin W.	1993
Parmenter, Derek C.	660
Paro, Julie M.	1130
Parr, Richard E.	646
Parrott. Dianne	145
Parsell, Mary	1158
Parson, Mary	454

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Parsons, Tracy	1331
Pasadena Casting Club, Inc. - Jim Edmondson	824
Pashayan, Charles, Jr., Congress of United States	8057
Pasillar, Ernie	1997
Pasillas, Steve	2865
Pasillas, Steve	8083
Pasterski. Robin & Trent	1668
Patalano, Louis	1315
Patterson, Nellie D.	2195
Patts, Carole	1029
Patwell, Steven W., M.D.	1285
Paul, P.	1261
Pawley, Kevin	964
Pawlick, Catherine	939
Pawlick, Gene F.	677
Pawlick. Margaret	678
Pawlick, Mrs. Beth	689
Paulsen, Mr. & Mrs.	2739
Payette, Marilyn	426
PDM Service Center - Connie Mac McNeal	259
Pearce, Sally	609
Pearl, Alfred M.	2495
Pease, Charles E.	2029
Peasley, Victora A.	1493
Peck, Anthony S.	2446
Peck, Arthur F., M.D.	1373
Peck, Phillip B.	1622
Peckner, Lloyd	635
Peltier, Larry	30
Pender, June	935
Penner, Tamara	2458
Pennington Enterprises - Stanley R. Pennington	256
Peralta, Alfredo	2384
Pereneuige. Paul A.	543
Peressenyi, Paul A.	1
Perez Trucking - Miguel Perez	303
Perez, Hector	2141
Perez, Inocencio	2193
Perez, Joaquin	1865
Performance Management Co. - Scott J. Simmerman	351
Perham, Dennis & Darleen	2451
Perisic, Catherine M.	2614
Peters, Charles F.	997
Peters, Paula	2317
Petersitge. Bruce	580
Peterson, Floyd	2209
Peterson, James E.	2494
Peterson, Rick	2760
Peterson, Ron	1106
Petitjean. L.A.	1667
Pettis, Claude M. III	1451
Pfeiffer, George R.	845

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PG&E - Bruce H. Nebit	2765
PG&E - P. Bruce Benzler, Director Land Planning	2297
Phillips, Connie & Robert	1589
Phillips, Donald D.	2012
Phillips, George H.	2454
Phillips, John	1506
Phillips, Ralph L., Ph.D.	1520
Picker Parts - Benjamin F. Anderson, Chairman & CEO	1697
Pickering. C.R.	2427
Piener, Philip	846
Pierce, Pat	23
Piet, Ruth San	2709
Pigott, C. Phillip, ChFC	1064
Pino, Mary	159
Pinsky, David	968
Pinsloy, Jim	795
Pinto, John	2194
Pizano, Richard	1939
Placer Co. Conservation Task Force - Helen Wauters	1221
Pland. Richard H.	2615
Plocher, Dennis	1459
Ploneis, David L.	851
Plumb, Steve	2058
Plumlee, Carol	1733
Plumley, J.W.C.	2644
Plummer, Marlene	1311
Plummer, Robert	1943
Pohorsky, Andrew T.	1463
Poitra. Steve & Michelle	2270
Polcuch, Eric	2573
Poole, Kenneth L., Inc. - Kenneth L. Poole, President	1353
Pooser Lumber Co. - Robert C. Pooser	2750
Pope Tire Company - George Pope	1004
Pope, Jim	74
Porterivlle Chamber of Commerce - James Stewart	1326
Porterivlle High School District - Jacob Rankin	2628
Porterville Area Environmental Council - Donald Zuckswert	2621
Porterville Aviation - Ed Wood, President	2368
Porterville Elementary School District - Jacob Rankin, Ed.D.	2627
Porterville Equipment Rental - Daryl Nicholson	128
Porterville Pallet Co. - George P. Stieb	238
Porterville Ready Mix, Inc.	512
Posey's Welding - Don Posey	668
Poston, Paul W.	1244
Powell, Arthur G.	1206
Powell, Janet	427
Powell, Roger	1926
Powell, Steve	1072
Powers, Marvin	324
Poulin, Cecile J.	896
Pratt's Transportation Service - Richard Pratt	537
Presley. Robert, State Senator	8067

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Pressnall, Dolores	1585
Preuss. F.A.	818
Preyer, Bernard G.	870
Prezelski, Pat	1263
Price & Paige - CPA's - William H. Stewart	674
Price, John	2223
Price, Mark 0.	778
Price, Sarah C.	651
Prince Associates, Inc.	1652
Profit, Michael Ray	2755
Protective Coatings, Inc. - Gene Noble	628
Provost, James R.	812
Provus, E.	1480
Provus, Edward	1979
Pruneda, Rene	2032
Pruneda, Rogelio	2128
Public Land Users Alliance - V.E. Johnny Johnson	8078
Pulido, Gloria	1962
Pulido, Richard	2108
Pumarejo, Ben	2221
Punkin, Timothy C.	1895
Purl's Sheet Metal - Michael Purl	1322
Quedow Ranch - Cowen Bowen	2582
Qugley, Kenneth J.	1802
Quigley, Joan	2196
Quigley, John	1869
Quinn Company - D.N. Cunningham	250
Quirarte, Laura	2469
Qulrarte, Louis A.	1174
R.D.N.	1891
Rabin. Syd	1991
Radalj, John	1232
Raddatz, Lorraine	224
Raddatz, Warren E.	264
Rader, Mrs. Ward T.	2583
Raffacle. G.	1167
Raffaele, Scott	1203
Raffle, Michele	1260
Rahl, John	2151
Raiklen, David	1292
Raines. Roy	104
Raisner, William M.	909
Ralph, Marty	498
Ramez, Dan	2144
Ramirez, Miguel B.	2015
Ramirez, Ronnie	2181
Rand, Deidre &Randy	2798
Rangel, Jose M.	1934
Ransdell. Robert R.	540
Rask, Irene E,	578
Rasmussen, V.L.	2093
Ratcliff. Charles H.	2055

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Ratner. Marc	1168
Rauch, Martin	2662
Rawl, June	1007
Rawson, Robert	1850
Ray, George P.	1357
Ray, Norma	2490
Ray, Robert	1009
Raymond, Elinor E.	1724
Raymone, Jatner John	1723
Rector & Sons Trucking - Larry Rector, Owner	1590
Redd, John	1338
Redding Lumber Transport - Al Shufelburger, President	8056
Redding, David & Susan	643
Redondo, Jose Luis R.	567
Reed Equipment Co. - Don Booker	1204
Reed, Dolores W.	530
Reed, Gary	2512
Reed, Sandy	1147
Reedley Chamber of Commerce - Lisa Bergthold	2411
Reese. Steven	2016
Reeves, Barry	2301
Reff. Deborah	1479
Regan, Catherine	652
Reid, L.	843
Reid, Les & Sally	737
Reilly, Leo	2232
Reimer, Bud	1591
Reimers, Ann	2816
Reliance Metalcenter - Milton D. Alley	473
Rempel, Robbin W.	1655
Rempel. Tamia	307
Remsen, Greg	2671
Remy, L.E.	a4
Rendon, Ernest	1916
Rennie, Ron	2390
Renwick, Leetha T.	554
Requeto. Thomas V.	2192
Requijo, Gilbert	8033
Resbitt, Helen	40
Resources Agency of CA - Gordon F. Snow	2491
Retech, Inc. - John N. Pringle	721
Retting, Comdr. V. Beauregard	55
Retting, N.B.	1013
Reyes, Jessie	2187
Reyes, Tony R.	8023
Reyna. Arthur	8037
Reynaga, Rudy	2043
Reynolds, Chris	1036
Reynolds, Kathryn G.	597
Reynolds, Winifred & Brewster C.	2777
Reznick, Mr. & Mrs. Emanuel	1063
Ricci, Manuel	2322

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Rice, Bonnie	2211
Richardsn. Gary L.	1436
Richardson, Barney	2508
Ricks, Marilyn J.	2366
Ridgecrest Chamber of Commerce - Nellavan Leckey, President	1376
Riee, Don	92
Rieland, Andrew L.	474
Ries. Shelley	2036
Riggs, Karen	343
Riley, Betty	1721
Rincon, Albert	2456
Rinde, Felix	1030
Ring, L.	1268
Ripley, Donna	1951
Ripley. John & Donna	2380
Rippee, James	1987
Rippetoe, Ernest	1801
Riippi, George	636
Risner. Donna	2455
Rivas, F. Pierre	1470
Riveil, Tom	2247
River Runner Magazine - Mark C. Larson	757
Rivera, David	2107
Rivera, Jesse	8038
Rivera, Mark A.	8048
Riverdale Irrigation District - Kimberley Mayfield	555
Rivers, Walter	736
Road, Georgina	86
Roat, Bob	2240
Roberts, George F.	1858
Roberts, Jack	844
Roberts, Janice E.	1757
Roberts, John H.. Jr.	10
Roberts, Kathy	1664
Roberts, Luther	1969
Roberts, Terri	106
Roberts, William	a20
Robertson, James	1254
Robertson, Robin	925
Robinson, John	773
Robinson, Melissa L.	509
Robinson, Ralla	2377
Robinson. Rodney	2756
Robison, Scott M.	11
Rocco, R.	255
Rocke, Janet C.	73
Rodin, Melin	1019
Rodriguez, Chris	2309
Rodriguez, Elias	2281
Rodriguez. Fred	2220
Rodriguez, Javier	2376
Rodriguez, Jessie	8051

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Rodriguez, Juan A.	2100
Rodriguez, Martin C.	1847
Rodriguez, Peter	1511
Rogers Machinery Co., Inc. - Jerry Chappelle, Manager	1359
Rogers, Brian	1870
Rogers, Dee	2325
Rogers, Don. Assemblyman	1201
Rogers, Doug	1025
Rogers, Gary	1920
Rogers, Jack	2776
Rogers, James B.	284
Rogers, Michelle	921
Rogers, Mr. & Mrs. Roy R.	546
Rogers, Ray	2364
Rohrer. Fred & Dee	146
Rola. John & Sandra	2343
Romero, Cristine	2035
Romero, Jesus	1931
Romley. Phillip	1554
Roogard, Larry M.	2477
Rooney. Peter	370
Roope, Gerald L.	2002
Rose, Paul B.	1442
Rose, Robert W.	2197
Rosedale, Ralph	1307
Rosezyk, Mary Lou	1681
Ross Equipment Co. - Randal Wells	1407
Roth. Edith	902
Roth. Mrs. Samuel I.	1423
Rowan, R.A. & Co. - Robert E. Wilson	577
Rowe's Electric - Phillip A. Williams	731
Rowe, Lisa M.	346
Rowe. R.M.	1001
Rowles, Mrs. Beverly	1675
Rouse, Michael W., O.D.	1075
Roush. Maggie	13
Rouverol. Teresa	1500
Royster. Karen L.	1779
Rubin, David M.	2258
Rubio, Fred M.. Jr.	1601
Rudobas, Ron	2356
Rudolph, Dale	692
Rueger, Brian A.	2642
Ruhland, Gary E.	2257
Rummelsburg, Jean	581
Runnels, Andy	8035
Ruschhaupt. Bud	2499
Ruseo. Gordon B.	2025
Russell, Julia	2665
Russell, Mary	51
Russell, William T.	2518
Ruszak, John	439

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Rutledge, Rod	1467
Rutschmann, Dr. Jacques	1413
Ryan, Catherine	70
Ryan, Patricia	624
Ryan, Tim & Barbara	2600
Sadler, Judy	1114
SAF S. San Joaquin Chapter - Robert Iwamoto, Chairman	2009
Sagebiel, John C.	176
Sager, Lee	811
Salazar. Inez	1651
Salem Equipment - Phil Judson	1398
Salfen. D.	1949
Salkow, Steven	1217
Sallarez, Joane	1225
Salvage Logging, Inc. - James W. Lundy	2496
Sambor, Helen	937
Samples, James	1974
San Gabriel Valley Fly Fishers - Bill Gerlach	1320
Sanborn, Alan	931
Sanchez, Francisco B.	2318
Sandberg, Craig	528
Santoyo, Manuel	1615
Saroyan. Robert	1256
Satterlee, Scott	1509
Sattler. Alfred	1387
Sawtelle Machine Shop - Terry Kwast	682
Sawyer, Silvia	2198
Save-The-Redwoods League	8076
Scenic Shorline Preservation Conf. - Fred Eissler	2712
Schaefer. William P.	2841
Schafer Pumps & Motors - L. Ostrom	1445
Schalscha, Kate	889
Scheer. LeRoy	1110
Scheiber. Dana	2226
Scheurich, Nancy Wahl	529
Schiller, Ron	2855
Schlaich, Kasper Jr.	2632
Schlichting, Bob, Mr. and Mrs.	1125
Schmaeo, Cathy	114
Schmer, D.	112
Schmidt, Jay W.	2113
Schmidt, Rudı	2549
Schnaar, Betty L.	1131
Schneider, David L. Dr.	1283
Schneider, Mary F.	1586
Schonest. Gary D.	2736
Schouest, Gary	2501
Schrier, Ted	1501
Schroeder, Kenneth	2295
Schwartz, B.	8052
Schwartz, Mary R.	2259
Schwartz, Wayne S. Dr.	341

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Schwayer. J.S.	1976
Schullery, E.D.	1183
Schultz. Alan E. Dr.	173
Schultz, Pat	1488
Schumacher. Eric	1011
Schumake, Carol	63
Schy, Leanne	1416
Scott, Fred J.	135
Scott, Joyce M.	842
Scott, Walter R. Inc.	557
Scow, Jan C.	2237
Seaman, Tammy	2075
Searls, R.T. Mr. & Mrs.	957
Seducca. Emanuel	784
Seeley, David	1207
Segal Ronald S.	832
Seitz, Robert M.	118
Self, Tommy Gene Ms.	1872
Selya, Manuel	17
Sequoia Forest Ind. - James Anthony, Executive VP	2359
Sequoia Forest Industries - Gene Brannan	1086
Sequoia Saw & Supply Co. - Gary Schurb	681
Sequoia Wood Products - Michael D. Kenney	8025
Serles, Edgar M.	1876
Serna, Amadeo	1631
Seward, Clifton	2610
Sewart, C.M.	142
Sexton. John	1438
Shafer, Ted D.	1599
Shaffer, Richard A.	758
Shannon Ranch - Jack R. Shannon	2746
Shannon, Gary W. MD	297
Shapiro, Howard H.	400
Shapley, Christopher	1430
Shapley. Lloyd	1112
Shapley. Peter	1526
Sharp, Robin	2310
Sharpe, Bonnie	31
Shaw, Roy	2294
Shave, B.	1849
Sheidenberger, C.	1159
Shekell, Margaret D.	468
Sheldon Oil Company - Jeffery B. Hopkins	8070
Sheldon, Larry	a93
Shelton, David	702
Shelton, Ray	2172
Shenanski. David E.	2731
Shepard, James S.	825
Shepardson & Blythe	1297
Shepherd, Samuel	2265
Sherman, D.	1223
Sherrill, Dan	1515

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Shiers. Ronald E.	1617
Shinaver, Kathleen	1039
Shoman, Judy	1417
Shorb, Keith	1609
Showalter. Holly	1129
Shrum, Leroy	2174
Shumaker, Ken	1079
Sides, J.M.	480
Siebert, Robert	1694
Sierra Club, Kern-Kaweah Chapter - Gordon L. Nipp	366
Sierra Club, Kern-Kaweah Chapter - Bill Neill	1096
Sierra Club, S. CA Water Res. - Larry Lacombe, Chairman	2277
Sierra Club, San Francisco Bay Chapter	1099
Sierra Club, Tehipite Chapter	2634
Sierra Ctr for Preservation of Biotic Diversity - Eric Beckwitt	1739
Sierra Pacific Fly Fishers - John E. Schubert	1333
Sierra Forest Products - Glen Duysen	2541
Sierra Pacific Industries - Ron Voss. Timber Manager	2077
Sierra Power Corporation - John Hamacher	2509
Sierra, Filbert	1603
Siesel, Steve	2243
Sifuentes, Jesus	1905
Sigford Logging - C.R. Sigford	221
Sigg, Jacob	1111
Signer, Roy	2743
Signer, Sara	2735
Siller Bros., Inc.	8072
Silva, Geralyn da	2242
Silva, Harold	1862
Silva, Ray	1910
Silver, Fran	12
Silverfarb, Janet	1946
Simi. Grovanm R.	497
Simington, Darlene	3
Simmons, Larry	958
Simmons, Mark	1528
Simmons, Steve	2081
Simms, Daniel L.	978
Simms. M.	746
Simms, Willis E.	1034
Simon Bros, Inc. - George Simon, Sr.	2261
Simon, Clifford	2184
Simons, John & Sue	571
Simons, Mark	541
Simpson, Larry	2061
Sims, James	2067
Singer, Ernestine	919
Sisco & Sisco Wire Rope & Rigging, Inc. - W.P. Strickland	506
Siv, Suzanne E.	2626
Sjostrom, Kenneth	1893
Skasol, Inc. - Don L. Marchman	2515
Skews, Geoff	2037

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Skinner, Judy	1662
Skinner, Mark	1008
Skresuig, Harlan A.	1838
Slayton, Henry	2086
Slechta, Richard	502
Slee, Kelly	8012
Slemmon, Edith L.	699
Sloat, Michael	2557
Slomanson. David	1780
Slone, Thomas H.	212
Slye, Richard	1961
Smith Auto Parts - Ronald Cochran, President	1051
Smith, C.	1262
Smith, Chuck	2307
Smith, Eric	1450
Smith, Jean A.	549
Smith, Larry D.	1753
Smith, Margaret	735
Smith, Mary	1565
Smith, Milo G.	2133
Smith, Rachel K.	134
Smith, Randy	1604
Smith, Richard E.	1568
Smith, Stephen	2709
Smith, Susan & Michael Mauldin	342
Smith, Susan M.	332
Smith, Susan MSW, LCSW	767
Smith, Theresa K.	2652
Snapp, Gusta & Kenneth	1341
Snider, Dennis, Jr.	1648
Snider, Gordon	948
Snyder, Bill	1699
Snyder, John	1971
So. CA Edison Co. - R.J. Juliff	2601
So. Fork Timber Industries - David Suhr	277
So. Fork Union Elementary School - Gary Bray, Superintendent	1748
So. Sierra Mining Council - William F. Inskeep	653
Sobel, Claudia	2267
Solan, M.	728
Solis, Benjamin	2064
Somera, Albert	2083
Somera, Allen	2361
Sonsalla. Jayne M.	2042
Sora, Mark	2210
Sorenson, James F.	1078
Sossamon, Larry	2146
Sowinski, Broofie A.	108
Spaite, Judith A.	2234
Spang, Richard N.	1304
Sparks, Mabel	1729
Speakman, Kathy	461
Spear & Jackson, Inc. - I.Gene Burman	496

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Specialized Hard Chrome - Gordon Crabtree. President	8062
Spencer, Lonnie	2371
Spiegel. Joel	2245
Spinks, Doug	373
Spohn, Michael	1764
Spooner, Nathan	2703
Sportsmens Co. of Central CA - Homer Harrison, Chairman	2008
Sportsmens Council, Cen CA - Henry Doddridge, President	1775
Spring Water Co. - Billy Cunningham, Owner	1409
Spring, Bruce M.D.	526
St. Germain, Arthur G.	1531
St. John, Mel	2585
Stafford. Kate K.	1737
Stafford, Larry	1822
Standage, Richard W.	2593
Standish. Doris	519
Stanislaus Co. League of Conservation Voters - Brian Ferrell	178
Stanley, Charles A.	687
Starbuck, Ed Forrell	1418
Stathos, Donald L.	231
Stayton, K.L.	2435
Stedman, Preston S.	8080
Steel Supply, Inc. - Paul Southard, President	1269
Stein, Michael	1704
Steinberg. Robert & Maria	739
Steinbergs, Dr. & Mrs. Dan	1411
Steinke. Doug	1178
Steinward. Margaret	1923
Stekel, Peter	718
Stella, Ed	1709
Steller, David D.	562
Stephen, J.M.	57
Stephens, Karen	435
Stephens, Stanley J.	1878
Stephenson, Thomas	1745
Stewart, Joan G.	8015
Stevenson, D.	1491
Stiber, Michael	607
Stillwell, George & Jeanie	314
Stilson, April	749
Stinson, Elizabeth	618
Stirling, Warren M. DDS	2567
Stivers, Donald C.	1706
Stock, Bert	922
Stockinger, Charles	52
Stockton. Laura	2738
Stoclting, Mark	569
Stohl, Kay	2158
Stoker, Carol	2255
Stone, Alice	8066
Stone, E.B. & Son, Inc. - Bradford G. Crandall	8074
Stone. Jeff	1644

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Stoner, Timothy R.	2608
Strachan, Don	2635
Strauss & Roberts	200
Strikny, Jerry A.	2153
Stringari. Tim & Kay	1175
Strong, Lynnda	417
Stroup, Richard	754
Stuart, Charles Mr. & Mrs.	992
Stubblefield. M.S. MD	667
Stuhr-Wood. Janet	2444
Stump, Theresa	2443
Styles. Robert	2561
Swanberg. Lee	1170
Swanbon, Jim	310
Swanda, W.H.	98
Swanson, John R.	305
Swearingen. Bill	1602
Swearinger. Jerry D.	1427
Sweeney, David	1524
Sweger, Alan	1472
Sugihara, Tommy Y.	1460
Swiriduk, Lynn C.	385
Suits, Elizabeth	1992
Suk. Tom	2821
Sukumar, N. Dr.	2418
Sullivan, Tim	1504
Summerville, Muriel	1713
Sunset Sanitation Service - Karen A. Lambert	126
Superior Filter Service - John A. Kangles	1325
Suprenant, Ronald	413
Sussman, Deborah	152
Sutherland, Mark	472
Suverkrup, Patti	781
Suydam. Rick	491
SW Co. Federation of Fly Fishers - Richard F. Lange, President	1832
Taguchi, Charles, Y.	1954
Tait. Dale N.	2096
Takaki, Dan	1824
Tarosovis. Diane	2126
Tarpley, Les	2018
Tate, Phil	2367
Tatum, Dale	2507
Taxpayers Association - Rose Marchette	2679
Taylor, Bob	2510
Taylor, Ellis Mr.	2602
Taylor, Flora B.	476
Taylor, Kenneth H.	670
Taylor, Lois P.	1672
Taylor, Mark	2370
Taz, Tonia	924
Teague. Charles	a020
Teague. Donald Mr. & Mrs.	192

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Teitelbaum, Paul	979
Teno, Judy	399
Term, Danen	2168
Terry, Bill	1892
Terry, c.	26
Tharp. E.M.. Inc. - Morris A. Tharp	205
Tharp, Judy	1975
Thaw, Steven	722
Thayer, Robert Ph.D.	536
The CHY Company - James P. Johnson, Forester	8077
The Kern Plateau Assn., Inc. - Ardis M. Walker	1582
The Live Oak Press - David Mike Hamilton	1774
The Merchant Magazine - David Cutler	495
The Nature Conservancy - Steve McCormick	2630
The Northlight Co. - Ralph W. Tucker, President	573
The Northlight Co. - Ralph W. Tucker, President	1354
The Planning and Conservation League	2832
The Wilderness Society - Jay Watson, Regional Assoc.	1758
The Wildlife Society San Joaquin Valley Chap. - Scott E. Frazier	2664
Theotig, Georgette	1288
Thomas, Bonnie	616
Thomas, Madeline	7
Thomas, Maurice A.	a73
Thomas, Rick	8032
Thompson, Doug	1805
Thompson, Jan	1222
Thompson, Mary T.	1735
Thompson. Maye	694
Thompson, Mike	1790
Thompson, Millie	8006
Thompson, Robert	2269
Thompson, Susan	827
Thorne, Rene J.	467
Ticberreu, H.	611
Tidwell, Don	1018
Tighe. Pat	1693
Tillis, F.H.	1558
Tim O'Connor Timber Felling - Tim O'Connor	626
Timberline Logging - Terry Northcutt	508
Timmons, Iris	397
Tinkle, Harold E.	1104
Tollefson, Mr. & Mrs. R.	1300
Tonsig, T.	301
Tonty, Don	300
Torres-Ochoa, Mario A.	1844
Tostevin, Breck C.	1462
Trager, John G.	638
Travers, Beverly	27
Travers, Bevery	1265
Traynor, Phillip, MPA	230
Treadway, John D.	783
Trenhaile, Stan	1327

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Trenhaile, Stanley & Phillis G.	1289
Trenhaile. Steve	664
Trevino, Evaristo	1766
Trevino, Martin	1762
Trevino, Ruben	1760
Triangle Lines, Inc. - Thomas Baily, President	1698
Triangle T/Stride Corp. - Steve Newton, Manager	1399
Triesen, Jim	2334
Tristan. Jose	1619
Trotter, B.	401
Truck Parts, Inc. - Robert E. Webb	861
Trujillo, Javier	8040
Tsai. Helen	1074
Tuckabury, Patricia, M.D.	602
Tucker, Anne	1138
Tulare Co. Board of Supervisors - Clyde R. Gould	2758
Tulare Co. Cattleman's Association - Mike Bennett, President	8058
Tulare Co. Economical Development Corp. - Edward F. Graves	2657
Tulare Co. Farm Bureau - John Corkins	2502
Tulare Co. Farm Bureau - John S. Corkins 2nd. VP	1657
Tulare County Audubon Society - Rich Howard	2505
Tulare County Audubon Society - Richard F. Howard	2607
Tulare County Audubon Society - Bard McAllister	1998
Tulare Lake Basin Water Storage Dist. - Brent L. Gordon	1360
Turner Crane Service Co. - H.L. Turner	698
Turner, Susan	493
Turner, Thomas J.	336
Turnupseed Electric Service, Inc.	1484
Turrill, Marilyn	2395
Tway, Robert	617
Tweed, Wm.	679
Tyhurst, Becky	90
U.S. Department of Transportation - FHA, Willis Kisselburg	288
U.S. Dept. of the Interior - Patricia Sanderson	2708
U.S. Environmental Protection Agency - Charles M. Murray, Jr.	8060
Ukiah Machine & Welding, Inc. - Ronald W. McGehee	325
Ulfeldt, Mr. & Mrs. Victor	532
Ulsh, Dale Logging - Dale Ulsh	1394
Umber, Donn	930
Underwood, David L.	398
Unger, Arthur & Lorraine	900
University of CA San Francisco - Bjorn W. Nilson MD, M.P.H.	1245
University of California	185
University of Santa Cruz - David Cope	357
Unterberger, Joe	429
Urban, David L.	489
Urrico, John	966
Urrico, Rick	977
Utt, Linda	8087
Uyene. Harry	48
Vaegele, Lois J.	50
Vafeades. Jean	2591

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Val Court, George & Sheri	2452
Valdez, Rogelio	2142
Valdez, Rosa	1886
Valentine, Patricia	2705
Valkass. Maris & Anna	1119
Vallaoine, Philip	1812
Vallejo, Joe	2105
Valley Boiler, Inc. - Donald L. Vassar	586
Valley Electric - H. Lee Dempsey, Jr.	662
Valley Employers Association - Robert T. Cherry	591
Valley Management Systems - Raymond E.Cope	1068
Valley Pacific Builders - Kevin M. Riffer	641
Valley Steel Construction - John B. Antonio	2779
Van Arsdale, Leon, DDS	275
Van Dillen, David E.	762
Van Hus. Mark	1914
Van Oppen. Ree	394
Van Sant. Gary R. & Judy J.	1275
Vance. Chris	2769
Vander Vear, Michael	1792
Vartanian Family	788
Vayles, Rocky	1839
Veatch. Catherine	2825
Vega, Charles	1937
Verdegaal Brothers, Inc. - Bill Verdegaal	1109
Vernon, Maxine Realty - Lola Adams	1082
Vernon, Maxine Realty - Maxine Vernon	1083
Vesperman, Gary	1066
Vester, M.	996
Villar. John A.	779
Villegas, Frank	2118
Vining, John	2304
Visalia Electric Motor Shop - Gene V. Quesnoy	298
Vivian, L.D.	39
Vlasek, Greg .	340
Von Raesfeld. Robert	1274
Voraas, Daniel R.	1696
Vorguard, Lindy L.	1365
Vorreyer. R.W.	1534
Votion, Jack & Marlene	2483
Voyles, D.L.	2007
Vuich. Rose Ann - CA State Senator	1402
Wade, Gene E.	2003
Wade, Tom	1386
Waggoner. John	726
Wagner Electronic Prod, Inc. - Delmar Wagner	198
Wagner, Kermit L., Agricultural Consultant	1317
Wagner, Stanley J.	2420
Wahl. Greg	941
Waldman, Katherine	515
Walhood, Richard & Linda	1597
Walker, Alan	867

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Walker, Bud	2565
Walker, C.T.	1363
Walker, Connie	416
Walker, Donald	1118
Walker, Gayle M.	2053
Walker, Jeff	2227
Walker, Kenneth L.	1804
Walker, Marlen	1610
Walker, Patricia	1134
Walker, Randell S.	2669
Walker, Steve	2792
Wall, Walter	1410
Wallace, Ron F.	1636
Wallae, Pete	1817
Wallin, Bettine	162
Walsh. Barbara A.	850
Walsh, David B.	1665
Walsh, Laura S.	1783
Walters, Wayne R.	2526
Walton, B.	424
Walton. Brad	404
Walton. Dan	2674
Ward, Donald	aaa
Ward, Gary	2001
Ward-Schmid Company, Inc. - Gary C. Nerland, President	695
Wardell, John	2861
Warden, Johnny	1368
Ware, Gary	1437
Warhank, John D.	1433
Waryst. Mrs. Alan	2715
Waterhouse, Nancy	465
Watkins, Gary	2124
Watkins, Jimmy	2407
Watkins, Oscar	2514
Watkins. Richard	1873
Wayne, D.	2308
Weatherman, Dennis	2784
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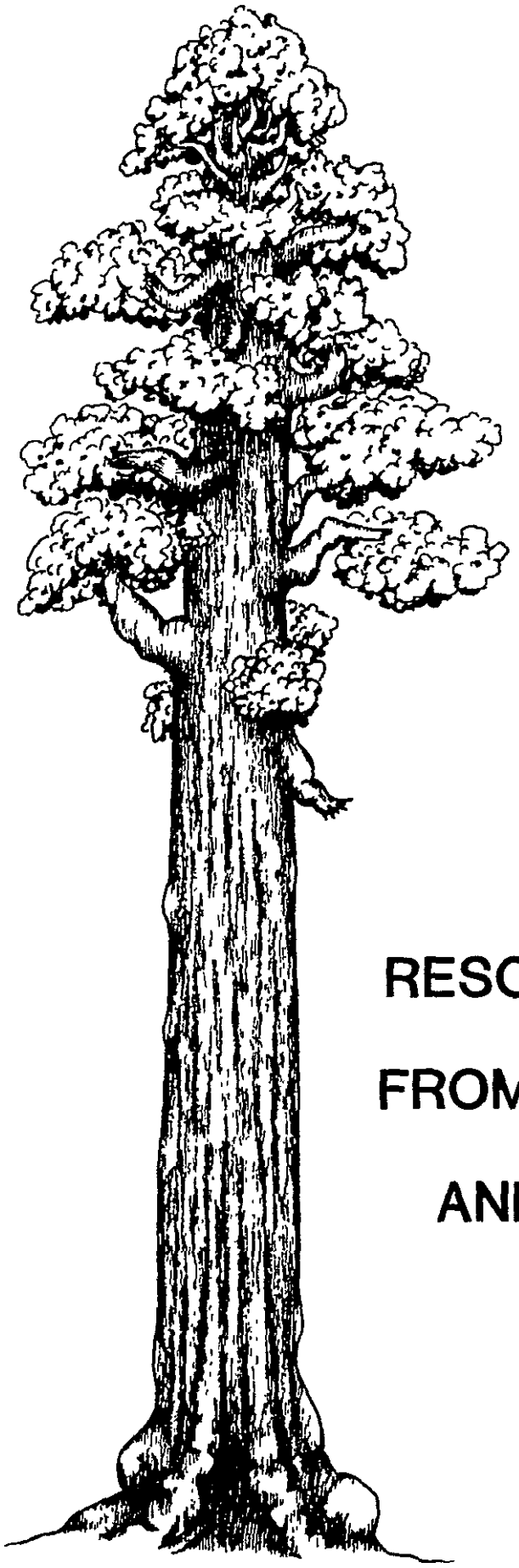

Section 7

RESOLUTION OF LETTERS FROM ELECTED OFFICIALS AND PUBLIC AGENCIES

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CHARLE" PASHAYAN. JR
17TH DISTRICT CALIFORNIA

129 CANNON BUILDING
WASHINGTON, D C 20515
(202) 225-3341

COMMITTEE ON
INTERIOR AND INSULAR
AFFAIRS

COMMITTEE ON
POST OFFICE AND CIVIL
SERVICE

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES

April 29, 1986

Mr. Jim Crates
Forest Supervisor
Sequoia National Forest
900 *West* Grand Avenue
Porterville, California 93257

Dear MI. crates:

I appreciate this opportunity to share with you my observations on the Sequoia National forest Draft Land and Resource Management Plan.

I share in the concerns that have been expressed in both the draft plan and the draft environmental impact statement. and generally concur with the resource elements *that* are discussed and the management direction that is proposed as the preferred alternative (PRF).

I do feel that the PRF, as well as other alternatives, meets the requirement of Section 3(d)(1) of the Forest and Rangeland Renewable Resources Planning Act of 1914, which states in part that "It is the policy of tne congress that all forested lands in the National Forest System be maintained in approprrate forest cover with species of trees, degree of stocking, and conditions of stand designed to secure the maximum benefits of multiple use sustained yield management in accordance with land management plans." as well as other provisions of that Act and the National Forest Management Act of 1976.

I have noted that for the past 25 years the Forest has provided an average 90.87 million board-feet of timber and one decade--from 1969 to 1979--the Forest provided an average of 120.8 million hoard-feet. This range of offering must be retarned. in my view, to meet the requirement of Section 14(e)(1)(C), which states in part that in the sale of trees from the National forest System the Secretary [of Agriculture] shall "...consider the economic stability of communities whose economies are dependent on such national forest materials...."

1 The ability of the sequoia National Forest to maintain a positive net cash flow from tuber--as it has throughout the 1980s--should be recognized and retained with sufficient flexibility to address shortterm obstacles.

I also noted that In the fish and wildlife habitat and rangel and management section that an effort will be made to treat 13,000 acres of
2 chaparral to benefit wildlife. While identification of the chaparral conversion is a Step forward in Winter range management for deer and other wildlife species, it has been suggested to me that the plan also identify some summer range habitat improvement.

PLEASE REPLY T O

☐ WASHINGTON OFFICE

☐ HOME OFFICE FRESNO COUNTY
1702 EAST BULLARD AVE SUITE 103
FRESNO CALIFORNIA 93710
(209) 487 5300

☐ HOME OFFICE KINGS COUNTY
804 NORTH IRWIN
HANFORD CALIFORNIA 93230
(209) 582 2898

☐ HOME OFFICE TULARE COUNTY
331 WEST CENTER STREET
VISALIA CALIFORNIA 93291
(209) 627 2700

☐ HOME OFFICE KERN COUNTY
301 HIGH STREET
DELANO CALIFORNIA 93215
(805) 725 7371

During a recent meeting with Forest Service personnel in Washington it was pointed out to me that a December 1985 Forest Service Instruction requires an inventory of off-highway vehicle (OHV) ways. According to that
3 policy the inventory is to include o w ways far 4x45, and two and three-wheeled vehicles. I trust that such an inventory is included in the frnal report.

I concur with the comments you have made relative to wilderness and wild and scenic river designations. The recommendation relative to the North Fork Kern River, with the addition of that portion of the river from the Johnsondale Bridge to the Kern-Tulare County line, is included in H.R. 4350, a bill passed earlier this month by the House of Representatives. The draft recommendation regarding the South Fork Kern River also is incorporated into H.R. 4350 as passed by the House. This legislation now is pending in the U.S. Senate where passage by that body and concurrence by the President will add both to the wild and scenic river system.

As for the Kings River. I support your decision to segment the main
4 stem and I agree with your recommendation to defer any decision until such time as the study of the Rodger's Crossing Dam Project is completed. In the interim, the area will be managed for its highest potential.

The decision to develop the potential of the Peppermint ski site and expansion of the Shirley Meadows facility and to defer decisions on the
5 potential sites at Sherman Peak and Mitchell-Maddox is prudent and has been endorsed by ski enthusiasts and others.

One of the biggest challenges you and the Staff of the Sequoia National Forest face in bringing a Forest Management Plan to fruition is the uncertainty of decisions not subject to the planning process itself. Budgetary
6 constraints can and do affect any of a multitude of missions, as do the restraints of legal actions in the courts. In order to meet the mission charged to you by the Congress the plans must of necessity be lenient on the one hand so that these finacial and legal obligations do not thwart the purposes for which the Forest was established.

Sincerely yours.

cc: Mr. Zane Smith

Congressman Charles Pashayan, Jr.

Resolution:

1. We believe that the Final Plan is the result of a thorough analysis of alternatives that included environmental as well as social and economic factors. Your concern for the economic stability of communities whose economics are dependent on national forest materials is equally shared by the Forest administrators. The planned harvest level is 101.6 MMBF (97 MMBF Green Timber and 4.6 MMBF Salvage). This approximates historical levels. We anticipate no economic changes to the local timber industry and related businesses.

2. Regarding your wildlife concerns, summer range habitat improvement is coordinated through the cooperative deer herd management plans developed by the California Department of Fish and Game. Also, many of the completed chaparral treatment projects or those proposed are located in areas utilized by deer during the summer and winter. The Rincon. Lloyd Meadow and Bull Run Basin burns are located in the 4,000 to 5,000 foot elevational ranges which encompass portions of both winter and summer deer ranges.

3. The Plan includes overall direction for the management of OHV's, identifying that they will be restricted to designated roads and trails. However, it does not contain the inventory referenced. The Plan directs that the Forest undertake study of and develop a trail management plan. This effort will identify, in detail, the trail system for hikers. equestrians, and OHV's on the Forest. As such. it will deal with wheeled vehicles. This will include use of parts of the Forest road system to link trails together and/or provide riding opportunities.

4. Enactment of HR-799 in November 1987 resolved the matter of Wild and Scenic River status for the controversial Segment 1 of the Kings River. As a principal involved in this matter, you clearly understand the issues and the details of the resolution do not warrant repititon here.

5. Study of potential ski sites at Sherman Pass and/or Mitchell-Maddox is included as a part of the Preferred Alternative. It is difficult to say when this might occur, but our best projection is during the second decade. Unmet demand will be a key factor in triggering any study. With Peppermint and other major proposals in the southern Sierra Nevada (outside of the Sequoia NF) demand may not exist in the time envisioned. In the meantime, we will manage these areas with consideration for possible development at some future time.

6. The complexity of the budget issue has been a matter of concern to many. Hopefully, we have helped foster a better understanding of the matter by including a special Appendix on the subject (see FEIS, Appendix L).

SALA BURTON
5TH DISTRICT CALIFORNIA

HOUSE OFFICE BUILDING
WASHINGTON DC 20515
PHONE (202) 225-4965

DISTRICT OFFICE
450 GOLDEN GATE AVENUE
SAN FRANCISCO CA 94102
PHONE (415) 556-4862

Congress of the United States
House of Representatives
Washington, DC 20515

COMMITTEE ON RULES
SELECT COMMITTEE ON HUNGER
DELEGATE
NORTH ATLANTIC ASSEMBLY

May 2, 1986

Mr. James A. Crates
Forest Supervisor
Sequoia National Forest
400 W. Grand Avenue
Porterville, California 93257

Dear Mr. Crates:

I am writing to express my concerns about the direction of management of the Sequoia National Forest as expressed in the Proposed Forest Plan.

1 My constituents use the Sequoia National Forest, as they do the other forest areas of California, and I have grave fears that current management directions will result In the destruction of what we have all come to expect from our forests.

2 The attraction of recreation is drawing more people to our national forest lands. Most of the proposed Forest Plan seems aimed at the extraction of resources from forest lands at the expense of the many attractions for the recreationist who looks at National Forest lands as belonging to and benefiting all of us in providing a unique and valuable range of outdoor activities. You must, therefore, recognize that increased demand and re-balance the multiple-use theory of management, even planning for future protection of the resources from destruction by the recreationists themselves. Any management plan must take into consideration this increased demand and attempt to balance multiple use with proper management for the future.

3 Another concern relates to continued intensive management of our timber resources -- a practice for which there appears to be insufficient supporting evidence and which will apparently continue to produce less than an optimal income to the forest. In fact, I understand that over 50% of timber sales are actually uneconomical when all costs are factored in. The effect of inappropriate timber management results in degrading other values of the forest which are becoming increasingly important to the inhabitants of the earth.

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBERS

I am a cosponsor of legislation in Congress to protect the Kings River, which is among the most magnificent of the Sierra rivers and presesvation of which could rank among the most significant accomplishment of the Sequoia National Forest. Acquiescence to developers of the Rodgers Crossing project would severely limit the sustainability of the forest to attract recceationists, protect fisheries and other wildlife habitat and truly maintain the interests of the public.

4 I am very pleased, however, with the progress of the North and South Forks of the Kern River through the Wild and Scenic Rivers designation process in Congress. Inclusion of those river segments will represent a particularly valuable addition to the protected rivers accessible to southern Californians.

My continuing commitment to wilderness issues leads me to comment on the deletion of so many precious areas from protective status. Congress did not intend for "released" lands to be rendered ineligible for wilderness status by the building of roads. These
5 areas, exemplified by Kings Canyon and Slate Mountain should remain preserved by administrative action and not opened for timber harvest or off-road vehicle use, or any other use that degrades their natural values. Future generations must have the option of deciding the fate of current roadless areas and unless they are preserved now, that option will not be available for those who follow us.

There are a number of other substantive issues which 'have been raised by my constituents, most of which are addressed in the "Conservation Alternative". It is my hope that you will give serious consideration to these concerns and that adjustments in the
6 management plan will be considered to more fairly reflect the interests of the public at large.

Sincerely,

SALA BURTON
Member of Congress

SB:jl/s

Congresswoman Sala Burton

Resolution:

1. The concepts and requirements of the many laws enacted by the Congress, especially since 1960. have been full incorporated into the analysis and decision-making processes of this Plan. We believe the Final Plan is the result of a thorough analysis of alternatives that included environmental as well as social and economic factors. We have utilized the ideas and knowledge of many individuals from both within governmental agencies and throughout the private sector.

   The Multiple-Use Sustained-yield Act of 1960 requires that we "develop and administer the renewable surface resources of the national forest for multiple-use and sustained yield of the several products and services obtained therefrom." Yet, other Acts (e.g., Wilderness Act, National Environmental Policy Act, National Forest Management Act, and the Forest and Rangeland Renewable Resources Planning Act contain specific requirements to look at all values and to develop a balanced program that will benefit the American people. This includes the wise use of resources, as well as provisions for recreation and/or preservation. The Preferred Alternative (RCM) will provide a balanced program over the long term.

2. The Plan fully recognizes the increased recreation demand and has dealt with it in many ways. A few are reiterated here. All are discussed in the Plan. Twenty-four percent (about 264,000 acres) are set aside for wilderness, 20 percent of the area to be harvested will be accomplished by uneven-aged silvicultural methods, five new botanical areas will be established, while four other areas will undergo action leading to their establishment as Research Natural Areas. In addition. recently enacted legislation established 118 miles of Wild and Scenic River on the Sequoia and Inyo NF's, and in Sequoia and Kings Canyon National Parks. These rivers were all being studied by the Forest Service for possible inclusion within the Wild and Scenic River System.

   Increased recreation demands often result in user conflicts and/or the need for resource protection. The Plan assures management to protect resources. In addition, there are major changes in use. For example, OHV use will be limited to designated roads and trails. Wilderness management plans will be developed for new wildernesses with a recognition that a permit system may someday be necessary when these fragile environments become overcrowded to the point where resource protection is needed. A comprehensive trail plan will be developed after examining the needs of all users. Ski area development will be studied, thus considering a use of only minor importance heretofore.

3. The Record of Decision explains the below-cost timber sale question. Please refer to that part of the document.

4. Enactment of legislation in November 1987 resolved the issues associated with Wild and Scenic Rivers on the Sequoia NF. This included establishment of the Kings River Special Management Area which addressed the matter of dam construction on the Kings River, and the

designation of both the North and South Fork Kern Rivers as components of the national system.

5. Relative to your wilderness concerns, the Sequoia portion of the Kings River RARE II Area was being analyzed within the Sierra National Forest's Land and Resource Management Plan. Their proposed plan recommended a non-wilderness designation. However, Kings River Wild and Scenic River Legislation (HR-799, November 1987) designated this area as a Special Management Area, thus resolving this issue.

   Concerning Slate Mountain and the other RARE II Roadless Areas that were released to multiple-use, the Forest has no intentions of building roads merely to reduce their wilderness potential. Roads are built as a service to other resources. They provide the access needed for land management activities. As is shown in Appendix C of the FEIS, it will be some years before access and timber harvest are undertaken in many areas.

6. The "Conservation Alternative" has been studied in considerable detail. Specific Forest Service resolutions to the various parts of this compendium of management proposals have been incorporated into Chapter 2 and Appendix N of the Final Environmental Impact Statement.

   * Please note that the Special Mangement Area contained in the Kings Wild and Scenic River Legislation contains the Kings River Further Planning Area.

1402

California State Senate

ROSE ANN VUICH
STATE SENATOR
FIFTEENTH SENATORIAL DISTRICT
FRESNO AND TULARE COUNTIES

March 7, 1986

Mr. James A. Crates
Forest Supervisor
Sequoia National Forest
900 W. Grand Avenue
Porterville, Calif. 93257

Dear Mr. Crates:

I am writing in reference to the proposed Sequora National Forest Land and Resource Management Plan.

My staff has been studying the EIR. and the Draft Forest Plan for the Sequoia Forest, and we are of the opinion that the preferred alternative best fits the multi-use concept, and the perpetuation of the natural resources of the forest.

We feel that although it would be possible to harvest a greater yield of timber under some of the other alternatives, there are many unknowns that can happen if the optimum is used.

While the three nulls that utilrze the Sequoia, have the capability of more footage, they can draw from other forests, and will not be subject to a shortage. This plan also calls for recreational development, and
1 wilderness allotment. It is felt that it is a balanced plan. We must continue to remember that the present management is only a temporary custodian for the future, and we should leave our natural resources in as good a shape or better than when we found them.

Thank you for the opportunity to comment.

Sincerely,

ROSE ANN WICH

RAV:et

State Senator Rose Ann Vuich

Resolution:

1. We believe that the Final Forest Plan is the result of a thorough analysis of alternatives that included environmental as well as social and economic factors. This Plan has incorporated the ideas and knowledge of many individuals from both within governmental agencies and throughout the private sector. It is, in our opinion, a balanced Plan.

2680

COMMITTEES
Long Term Care
Agriculture
Labor & Employment
Public Investments
Finance & Bonded
Indebtedness

Caucus

Committee Referee
Rent and
Rules

Assembly
California Legislature

BILL JONES
ASSEMBLYMAN THIRTY SECOND DISTRICT

CHAIRMAN
ASSEMBLY RURAL CAUCUS

VICE CHAIRMAN
ASSEMBLY LABOR & EMPLOYMENT COMMITTEE

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DISTRICT OFFICE
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Suite D
Visalia CA 93277
TELEPHONE (209) 734 1182

DISTRICT OFFICE
1285 W Shaw Suite 104
Fresno CA 93711
TELEPHONE (209) 224 7833

FROM Porterville Dinuba Exeter
Three Rivers and Springville
ENTERPRISE 14463

April 25, 1986

Mr James A. Crates, Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, California 93257

SUBJECT. Sequoia National Forest Land and Resource Management Plan

Dear Mr Crates:

We have been reviewing the Draft Forest Plan and EIR for Sequoia Forest, and are of the opinion that the preferred plan, with some minor revisions, best addresses the issues of economic return, recreational uses and environmental protection for the Forest. You and your colleagues are to be commended for the thorough way in which you addressed the complex issues in the two documents, and the exhaustive efforts at Obtaining public input throughout the process.

1 The principal revision of the preferred plan we would recommend is in the area of fisheries. We note there is no direct habitat improvement Work done for fisheries and would ask you review the reasons why this is so and urge this work be done Where possible

Thank you for the opportunity to Comment on this most important effort

Sincerely,

BILL SONES

BJ bw

cc Mr Kent Duysen
Mr John Corkins
Mr Dick Keefe

Assemblyman Bill Jones

Resolution:

1. We share your concerns relative to the fisheries management discussion in the Draft EIS and Plan. The Final Plan and EIS have been modified to include fish habitat improvement work. Please refer to Chapter 3 of the Plan under Fisheries.

1201

Assembly
California Legislature

PLEASE RESPOND TO
SACRAMENTO ADDRESS
STATE CAPITOL
SACRAMENTO CA 95814
TELEPHONE (916) 445-8398

DISTRICT OFFICES

BAKERSFIELD CA 93301
TELEPHONE (805) 395-2927

SOUTH MAIN STREET
SUITE 3
TULARE CA 93274
TELEPHONE (209) 688-2864

DON ROGERS
ASSEMBLYMAN THIRTY THIRD DISTRICT

COMMITTEES 1985-86
Vice Chairman
Natural Resources
Local Government
Public Safety
Member Rural Caucus

March 26, 1986

Mr. James A. Crates, Forest Supervisor
Sequoia National Forest
900 W. Grand Avenue
Porterville, CA 93257

Dear Mr. Crates:

As a State Assemblyman, I represent parts of Tulare and Kern Counties. I also operate a small company in the Bakersfield area. I am writing to you regarding the proposed management alternatives for the Sequoia National Forest.

In my opinion, current use of Forest Service lands serve the many and varied demands of people in our state. The utilization of the renewable timber resource has many benefits for Tulare and Kern Counties. The timber industry utilizes the same suppliers and Services as many of the oil companies in my district and now more than ever, they play a part in the economic well being of the community.

As you know, oil production and its associated employment have already been reduced because of lower world oil prices. The direct payments to the counties of my district from National Forest receipts represent dollars of increasing significance in view of this uncertain oil future.

In 1985, Tulare County received over $611,000 and Kern County over $250,000. If Federal budget cuts are on the way, increased receipts from the National Forest could provide the counties a measure of relief.

The people of Tulare and Kern County will benefit from timber
1 harvest levels at or above the level shown in your preferred alternative and I urge that you adopt a management plan to do so.

1 Thank you for giving me an opportunity to voice my support for a continuation of the harvest of this renewable resource at present or slightly increased levels.

Also I appreciate the cooperation and service that your organization provides for many of my constituents.

Yours truly,

Don Rogers

DON ROGERS

DR/sc

Assemblyman Don Rogers

Resolution:

1. The economic well-being of those communities who are dependent on national forest materials is a concern shared by Forest administrators. As shown in the Record of Decision, local economic effects were one of several factors considered in determining the Forest's allowable sale quantity (ASQ). The average annual volume harvested for the last 27 years (1960-1986) was 92 MMBF. This ranged from 57 MMBF in 1982 to 125 MMBF in 1977. The projected harvest level is 101.6 MMBF (ASQ is 97 MMBF and 4.6 MMBF Salvage), well within the historical levels sold by the Forest. We believe this volume of harvest will allow the continued balance of multiple uses that have existed while maintaining a viable forest industry in the local counties.

1567

[illegible]
[illegible] Capitol
[illegible] CA 95814
[illegible]

District Offices
[illegible] Stockdale Highway
[illegible] 112
[illegible]field CA 93309
[illegible] 395 2673

[illegible] W. Lancaster Blvd. No. 1
[illegible] CA 93534
[illegible] 3544

[illegible] N. Chura Lake Blvd.
[illegible] B
[illegible] CA 93555
[illegible] 5816

Assembly

California Legislature

PHILLIP D. WYMAN
ASSEMBLYMAN THIRTY FOURTH DISTRICT

[illegible]
[illegible]
[illegible]

COMMITTEES
Transportation
Judiciary
Labor and Employment
Water Parks and Wildlife

MEMBER
[illegible] Commission
[illegible] Legislative Budget
[illegible]

April 4, 1986

Mr. James A. Crates
Forest Supervisor
SEQUOIA NATIONAL FOREST
900 W. Grand Avenue
Porterville, CA 93257

Dear Mr. Crates,

This letter is in response to your request for public comment concerning the proposed management plan for the Sequoia National Forest.

1 First, I wish to express my support for the reasonable request of the Timber Industry concerning the annual amount of timber to be harvested. Second, I believe that it is essential that social and economic considerations be given as much weight in forest plan decisions as are environmental concerns. Lastly, because California is the second largest lumber and timber producer in the nation, and provides over 100,000 jobs to Californians it is imperative that the industry be allowed to flourish for the economic well-being of the state.

Thank you for your thoughtful consideration on this very important subject.

Sincerely,

Phillip D. Wyman

PDW:rkh

Assemblyman Phillip D. Wyman

Resolution:

1. We believe the reasonable requests of the Timber Industry have been met in the Preferred Alternative, which includes an annual harvest level of 101.6 MMBF (97 MMBF Green Timber and 4.6 MMBF Salvage). The average annual volume harvested for the past 27 years was 92 MMBF with a range from 57 MMBF during 1982 to 125 MMBF in 1977.

   Concerning social and economic considerations, the Record of Decision shows that local economic effects were one of several factors considered in determining the allowable sale quantity. Since the proposed level of harvest will approximate historical levels, we anticipate no economic changes, to the local timber industry and related businesses.

1444

FIRST *SUPERVISORIAL* DISTRICT
COUNTY* OF *KERN

ROY ASHBURN
SUPERVISOR

[illegible] Main Street
Delano, CA 93215
[illegible]

[illegible]

[illegible]

Toll Free 1 800 221 3625

March 27, 1986

Mr. Jim Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Dear Jim:

I have had numerous meetings and received many comments from residents of my Supervisorial District regarding the Draft Management Plan far the Sequoia Forest. I'd like to pass along to you my thoughts regarding this issue.

During my many years of dealing with Forest Service issues, I have cereainly dealt with many that are controversial. However, the public reaction to this Draft Plan is stronger and more vocal
1 than any I can remember. Almost universally, the comments express deep concern that the interests of all parties involved Were not eaken into consideration. From the initial presentation of the Plan, the communities affected have felt as If their comments Were not being adequately addressed, nor were their concerns really being taken into account. In fact, many feel that they have not really had the opportunity to have their questions answered at all.

2 Of course, the presentation of a 50 year management plan will be greeted with a wide divergence of opinion, but my goal is to ensure that those opinions are not discounted, but rather used to help re-define and focus ehe future of our forest.

I appreciate the extension of the public comment period on the Plan, and the additional hearings which have been scheduled. Both timber industry representatives and recreationists have
3 expressed to me their concerns over limits on harvesting and on the practice of clear cutting, and I hope that, in review of the Draft Plan, there issues will be carefully considered

I hope thae these comments are helpful to you. I would be glad to discuss any of these issues further with you.

Best regards,

Roy Ashburn
supervisor
First District

RA/scb

Kern County Supervisor Roy Ashburn

Resolution:

1. Throughout the land management planning process, the Forest has been committed to providing broad opportunities for public involvement. Initial scoping in 1979-1980 included meetings in several locations with the public, government agencies, and employees. Public comments were analyzed, resulting in 14 issues now identified in Chapter 2 of the Final Plan.

   At several points during the preparation of the Draft, informational news letters were sent to all those who had expressed an interest in the Forest Plan.

2. After the Draft Environmental Impact Statement and Draft Forest Plan were issued, public meetings were held in six cities. At each meeting the organization of the documents was explained and a question/answer period followed. Public hearings were held in Visalia and Kernville to allow verbal comment. Announcement of these meetings and hearings received widespread media coverage. Each of these meetings, hearings, and various media contacts encouraged public comment. The Forest received about 3,000 responses to the Draft documents from a broad range of interests, including organized groups, individuals, and public agencies.

   The Preferred (PRF) Alternative responds to public concerns surfaced since the Draft was published. A comparison of the difference between the Preferred Alternative (PRF) in the Draft and the Preferred Alternative in the Final will show the results of public input.

3. You asked specifically about "limits on harvesting and on the practice of clear cutting." The average annual volume harvested for the last 27 years (1960 - 1986) for the Sequoia National Forest was 92 MMBF. The Plan recommends an annual Timber Harvest of 101.6 MMBF (97 MMBF Green Timber and 4.6 MMBF Salvage) through the planning period--a volume that our analyses suggest can be sustained over time. Concerning clearcutting, we recognize this silvicultural regeneration system has been highly controversial. Current professional land management practices and public law enacted over the last 15-18 years have reduced much of this controversy. The Sequoia, in the Preferred Alternative, proposes to manage 20 percent of the suitable land by uneven-aged silvicultural methods. In addition, young growth and clumps of mature trees will be saved on tractor loggable ground whenever feasible for regeneration, wildlife, and visual purposes.

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US DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
211 Main Street. Room 1100
San Francisco, Califomla 94105

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA

January 17, 1986
IN REPLY REFER TO
HPP-09

Mr. James A. Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, California 93251

Dear Mr. Crates:

We have reviewed the draft environmental impact statement and proposed forest plan far the Sequoia National Forest Land and Resource Management Plan in Tulare, Kern, and Fresno Counties, California, and provide the following comment.

> At the present time. there are no known projects within the California Department of Transportation's Federal-aid highway program that will impact or be impacted by the proposed management plan. If and when a future Federal-aid highway project affecting Sequoia National Forest is proposed, it will be coordinated with the U.S. Forest Service.

We appreciate this opportunity to review the subject draft EIS and forest Plan.

Sincerely yours.

Willis Kisselburg, Jr.
Willis Kisselburg, Jr.
Director. Office of Planning and Program Development

U.S. Department of Transportation

No Forest Service resolution required.

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE FLIGHT TEST CENTER (AFSC)
EDWARDS AIR FORCE BASE CALIFORNIA 93523

REPLY TO ATTN OF: DE, Stop 210

20 MAR 1986

SUBJECT: Sequoia National Forest Land and Resource Management Plan (Draft Forest Plan) November 1985

TO: James A. Crates, Forest Supervisor
sequoia National Forest
900 West Grand Avenue
Porterville, California 93257

1 Headquarters Air Force Flight Test Center at Edwards AFB appreciates the recent opportunity to review your Draft Environmental Impact Statement (DEIS) an6 Draft Forest Plan (DFP) We also wish to thank you and your staff for taking the time to discuss portions of this important plan with Department of Defense personnel. The following comments are offered.

1 a. Noise. A large portion of the Sequoia National Forest lies within the military R-2508 Restricted Area Complex (see Atch 1). The R-2508 Complex runs from just south of Edwards AFB north to Big Pine and from approximately 10 miles east of the Kem River Canyon to Death Valley This complex is the site of extensive military aircraft testing and operational flights. In FY 85, an average of 373 aircraft flew in the Complex each duty day for a total annual sortie count approaching 88,000 These numbers are expected to increase significantly over the next few years. Speeds are subsonic except in the Panamint Valley and the southern pact of the Complex; however. except in the Death Valley area. there are no restrictions to supersonic flight. Although a floor of 3.000 feat above the surface is voluntarily imposed in the national parks and monuments located within the area. flight altitudes go down to as low as 100 feet above the surface on specified low altitude routes As a cesult. military overflights may occasionally be a source of annoyance to visitors seeking solitude and, while overflights may detract some from total solitude. they will not eliminate the overall opportunities for solitude in the designated wildemess areas

2 h Fire Fighting Operation US Department of Agriculture Forest Service conducts air operations foe detection and control of forest and wilderness fires. when thase air operations ace conducted in areas used by military aircraft, the potential for mid-air collision exists Request USDA Forest Service advise air traffic control facilities at the earliest possible time when Forest service aircraft are operating in areas specifically used by military aircraft An example of potential conflict would be a fire in wilderness and forest areas within R-2508. If Forest Service aircraft ace deployed to fly in the R-2508 Complex, Edwards AFB Approach Control and Edwards AFB Central Coordinating Facility need to be advised as soon as possible In areas outside R-2508, the FAA air traffic control facility with

responsibility for the area needs to be notified of Forest Service aircraft flying within their airspace. Air traffic nonessential to combating the fire can then be cautioned about the area. thus reducing the potential for mid-air collisions.

c Visibility: We wish to draw your attention to the AFFTC's unique
3 requirements for exceptional visibility The California Air Resources Board Resolution 82-51 (see Atch 2), dated 22 September 1982. recognizes DoD's need for exceptional visibility Reductions in visibility have a direct adverse effect on the flight test and evaluation mission of the Center. Particulate matter emitted in wood smoke from prescribed forest fires could have a direct impact on visibility reduction in our region AFFTC staff attended the recent California smoke Management Workshop in order to present our visibrlity concerns and become actively involved in the smoke management planning process. We were informed that approximatley 70 percent of the particulate matter given off from prescribed fires lies in the 2 5 micorn range and below Particulate matter in this size range is very effective at reducing visibility due primarily to scattering and adsorption In addition. these fine particulates have long residence time in the atmosphere Thus a potential exists for short and long term impacts to visibility reduction if burns are conducted under unfavorable meteorological conditions for our downwind air basin. AFFTC staff met with Sequoia National Forest and Region 5 Air Quality staff at the smoke Workshop. We will continue working with your staff to improve compatible smoke management efforts. We will also be reviewing the draft smoke management polrcy document in the near future Hopefully. wa can cooperate on monitoring future upwind prescribed burning in order to better define the impacts to visibility reduction from such sources. With such data in hand. we can then work effectrvely towards formulating mitigations. Due to our unique situation, in which visibility requirements exceed the state standard of 10 miles over half the horizon. we suggest visibility and the impacts from prescribed burning be fully addressed in the final EIS as a separate component of air quality, as well as in future project specific burn environmental assessments.

In addition to visibility impacts in our air basin, we are concerned about weekday visibility impacts over the National Forest Weekday military flying missions are conducted in portions of R-2508 airspace which could overlie National Forest areas where prescribed burns are conducted Weekday burning and it9 smoke plumes could temporarily reduce visibility along our flying routes This may present a safety hazard to both our operations and your aerial ignition and observation aircraft Request your burning operations coordinate the times and locations of burns with Edwards AFB Central Coordinating Facility ((805)277-2508) when weekday burns will be conducted under R-2508 In this manner, our pilots will be aware of burning operations in your area

2 It is the AFFTC's intention to continue to work together with sequoia National Forest personnel an future plans Hopefully. we ca preserve our unique capability for conducting aircraft research and development. while maintaining a "good neighbor" relationship with other federal agencies We

are willing to provide your forestry Staff with a comprehensive briefing on our activities that will allow us to maintain our mission capability while encouraging compatible use for the area

3. Point of contact at *the* AFFTC is Mr Javad Hada at (805) 277-4730

FRED ROCHEZ, Col, USAF
FRED ROCHEZ, Co
Director of Civil Engineering

2 Atch
1 History
2. CARB Res 82-51

Department of the Air Force

Resolution:

1. We recognize your concern about noise and the potential to be a source of annoyance and loss of solitude for Forest visitors. Current regulations relative to the allocation of air space over the Forest, however, seems appropriate for the planning period. Future decisions involving priorities between wilderness solitude and National Defense training missions more appropriately belong in the political/ legislative arena for resolution. Recent enactment of PL-100-91 will result in the Forest Service undertaking an assessment to determine any adverse impacts to wilderness resources. No details on how this assessment will be done are available now.

2. The potential mid-air collisions between military and Forest Service aircraft is certainly a problem with potentially significant consequences. Procedures exist for notifying Edwards AFB approach control and the FAA when sustained firefighting air operations that involve several aircraft are operational. Procedures are needed, however, to notify the proper air-traffic controllers for other flights within the R-2508 complex. This is beyond the scope of this Plan and will be pursued for resolution.

3. Relative to visibility concerns, the Forest is aware of the Air Force requirement for exceptional visibility and will continue to work closely with Air Force staff. Sequoia National Forest and the Air Force share a common concern for continued air quality vigor in the Southern Sierra. We hope to develop some cooperative projects that will establish baseline pollutant concentrations and transport patterns in the Walker Pass area.

   The effect of prescribed fire on air quality and specifically visibility along with proposed smoke arrangement strategies will be addressed in greater detail as future project level environmental assessments and burn plans are developed.

   Air Force notification of prescribed burns conducted under R-2508 has been implemented into our current procedure and incorporated into the Standards and Guidelines of the Final Plan.

2708

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
PACIFIC SOUTHWEST REGION
BOX 36098 • 450 GOLDEN GATE AVENUE
SAN FRANCISCO, CALIFORNIA 94102
(415) 556-6200

APR 25 1986

ER 85/1699

James A. crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257-2035

Dear Mr. crates:

The Department of the Interior has reviewed the draft EIS and proposed management plan for the Sequoia National Forest and has the following comments. For ease of review, the specific comments are referenced in [illegible] appearance i[illegible]t documents with a [illegible]te set for [illegible] plan [illegible] the EIS, followed by specific re[illegible] [illegible]c[illegible]ns.

Plan Specific Comments

Page 1-1, section A

1- We suggest that, associated with the monitoring there should be sane more definite provision for updating the Plan as legislative directives, Forest Service policy or local, regional, or national needs change. Updating should include opportunity for public and other agency review and comment. A 50-year plan with no opportunity for change may become a liability rather than an asset.

Section B

2- If the intent is to increase public benefits as stated, and since there are provisions in the Plan for timber harvest, grazing, hunting, water production. etc., it seems these things should be part of the vision statement. The vision statement mostly includes recreation/esthetic concerns.

Page 1-2, Section E

3- When can an appeal be taken?

Pages 2-1 thru 2-11	4-	Neither the Forest Plan (pages 2-1 thru 2-11) nor the EIS (pages 1-3 to 1–10) identifies minerals exploration and development as an issue or concern associated with the management of the Sequoia National Forest, yet the Bureau of Land Management has frequently voiced their concerns regarding the development of mineral resources an the forest. Geothermal Leasing in Monache Meadows being the most recent example.
	4-	Minerals exploration and development including impacts of implementing renewable resource standards, guidelines and related decisions on mineral resources should be treated as an issue in the Sequoia NF. planning pmcess.
Page 2-9	5-	"No new energy production is anticipated in the next 10 years."; however, on 3-14 it is stated, "Preliminary proposals for additional generation capacity of 23 [illegible] have been made." and "Potential energy development will n[illegible] li ely be an expansion of existing or cons[illegible]on of new hy[illegible] Also this does not reflect the geothermal potential in Monache for, at least, exploration.
Page 2-11	6-	Tradeoffs between stream and wetland protection. and the production of goads and services. This could also eliminate or severely reduce mined exploration and development in the zone. This impact should be identified and discussed.
Page 3-3 1st paragraph	7-	Is the in lieu of taxes payment of $500,000 to $1,000,000 a per year amount, or that much for the five-year period?
Page 3-3	8-	Lifestyle. me last line should he expanded to read, "by providing forage for livestock."
Page 3-6	9-	social Groups in Foothill Communities. Valid miring claims impart real property rights on National Forest public land. To exclude the major property right holders from this "Social Group" section seems misleading, especially in light of the fact that historically, most of the foothill communities began as mining communities.
Page 3-8	10-	6.a. Native American Populations. This section refers to Native American populations within the Forest but does not identify the Kawaiisu Indian group. Since the Kawaiisu traditionally occupied the southem portion of the Forest Plan area

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and some descendants of the Kawaiisu still live in the region perhaps this group should be identified in the plan.

Page 3-8 6.a.2) Tubatulabal Indian Group.

11- The statement concerning commercial pinyon nut gathering suggests that the Forest is currently issuing commercial permits. It is our understanding that commercial pinyon nuts harvesting within the Forest has not occurred in the past nor at the present time. If this sentence relates to the 1982 contract on BLM in the Chimney Peak area, "complete with commercial gatherers" is probably not an accurate description of the situation. There have been only a few commercial permits issued by the BLM during the past 10 years and these were not within Rockhouse WSA. me permits were issued only after evaluating the crop ta determine that there was not significant reduction in the availability of nuts for the general public (noncommercial use) and for wildlife.

Page 3-9 12- C Resource Elements, a. Air Quality. The oil and gas industry in the south end of the San Joaquin Valley may contribute significantly to air pollution on the Sequoia National Forest.

Page 3-10 2. Cultural Resources.

13- Paragraph 2. This paragraph refers to food processing sites and bedrock mortars as though they were different types of cultural features. To clarify the sentence, perhaps it should read as follows: "The most common archaeological site types include lithic quarries."

14- Paragraph 7. me paragraph refers to 36 CFR 60.6 as containing the criteria for evaluation of site significance. The reference number is incorrect. it should be 36 CFR 60.4.

15- Paragraph 7. The last sentence refers to ethic which is incorrect. me ethic should be deleted and replaced with ethnic.

page 3-12 16- 4. Earth Resources. There should be some mention of flood hazard and floodplain management--perhaps in this section. We were unable to locate any discussion of this issue elsewhere in the document.

3

Page 3.19 17- b. Wildlife. Little Kern golden trout is a threatened species and should be listed under part 6.,6) along with California Condor, Peregrine Falcon and Bald Eagle.

page 3-24 18- 11. Pest Management. No mention is made of bubonic plague, but it must exist in Forest campgrounds as it is found over the southern Sierra region.

Page 3-26 19- Paragraph 6 "...five mines in operation." Do these mines possess valid existing rights? If so, it should be specified so the public is not confused with the segregative effective effects of wilderness designation.

Page 3-27 20- The 3rd paragraph, 2nd sentence, last clause states "...,the Forest is open to mineral development subject to the mitigation of impacts to surface resources." Yet the impacts of implementing this standard an mineral exploration and development are not addressed in the DEIS.

21- Assessment of the impacts on mineral exploration and development of the implementation of renewable resource standards, guidelines and decisions that tend to limit, restrict or inhibit development of the mineral resources would clarify. This assessment should be not only for the proposed action, but all alternatives.

Fage 3-28 22- 16. Office of Information and Interpretive Services. The San Francisco Bay area, also a significant population center. is within a four-hour drive of the north end of the Forest. Bay area visitors comprise a significant portion of the visitors to the National Parks and, we suspect. to Sequoia National Forest.

Faga 3-31 23- Table 3.4. The last ROS Class is shown as RU and the previous definitions do not include an RU Class. Should this be R/U?

Page 3-33 24- f. Winter Recreation opportunities and Page 4-3, I Economic Condition. We have significant concerns about the effects of the proposed Mitchell-Haddox ski area. That ski area, which according to the draft Plan will contribute most of the increase in economic growth, will undoubtedly have significant effects on Kings Canyon and some effect on Sequoia National Parks. Mitchell Peak is actually within Kings Canyon National Park. A major ski area next to the park designated wilderness, will certainly compromise the

4

quality of the wilderness experience there and undoubtedly increase winter use significantly.

24- Increase in cross-country skiing, while compatible with wilderness, could easily reach a volume that would compromise solitude. Encroachment of snowmobiles (which are rountely associated with ski areas) an the wilderness is also a real and significant threat. Further, the sights and sounds of a major ski development from the park wilderness muld be deleterious.

24- Another significant potential effect muld be the dramatic increase in traffic through Grant Grove to access the ski area. There would also be potential pressure for improving (widening, straightening) or rerouting the mad through the park to improve traffic flow. The ski area would also have a detrimental effect on the quiet winter beauty of Grant Grave by an increased number of skiers using the concession facilities. although increased clientele would benefit the concessioner financially.

25- 2nd paragraph 8the line - "pacific Crest National Recreation Trail" should read **Pacific** Crest Scenic Trail.

Pages 4-2, 4-3, 4-4 26- Forest Goals have elements which are potentially negatively impacting to mfneral resource exploration and development, yet these potential inpacts are not addressed in the EIS or identified in the EIS summary or Environmental Consequences section. Typical examples am found in Recreation items 9 and 10 on page 4-2, wildlife and Fish item 1 on page 4-3, and Water, Soil and Air item 3 on page 4-4.

Page 4-7

Fisheries, Wildlife, and Sensitive Plants. Our primary concerns are relative to wildlife, as follows:

27- The proposal calls for habitat maintenance for only one pair of nesting condors. From aut review of historic records of just the Dennison Ridge area of the Parks, them have been at least several nesting pairs in that area over time. We believe that the Forest Plan should have limits on other uses that would retain condor habitat suitable for at least a half-dozen nesting pairs. The habitat should be managed sa that they could be reintroduced at any time.

We support plans, as proposed, to provide habitat for peregrine falcons.

5

28- Recognizing that the same spotted owls and northern goshawks use portions of the Forest and National Parks, we believe it is important that sufficient habitat be perpetuated for their support. We also recommend a management plan for the pileated woodpecker, another sensitive species. Consideration of this species should be made in timber harvest plans because, even though it prefers old growth timber, it will use second growth areas.

29- We recommend an inventory be made of the willow flycatcher (sensitive species) and an analysis of the effects of the encroachment into its habitat by the exotic brownheaded cowbird.

30- Two sensitive species of mammals found in the southern Sierra. but not addressed in the Plan, are the red Fox and fisher. Since both inhabit old growth timber and older second growth, plans for habitat management should include these species.

Page 4-8.j

31- 2) Fire Management. We recommend continuation of coordinated fire management planning on areas of contiguous boundaries between the Forest and the Parks. This is not mentioned in the plan.

Page 4-8.k
Minerals

32- The statement, "The Sequoia National Forest contains few large reserves of highly valuable minerals" is contradictory to the EIS summary (page 12) which indicates that the forest contains 670,000 acres of medium and 335,000 acres of very high/high mineral potential for gold, uranium, and tungsten.

Page 4-10.n

33- Vegetation, 5) Timber. Our major concerns regarding several timber plans involve those areas that either adjoin the Park boundaries or are located upstream or upslope from proposed timber harvest sites (i.e., Chimney Rock/Stony Creek, Redwood Mountain, Grant Grove and Dennison Ridge). Timber sales should be managed so that erosional effects from sale areas do not adversely affect Park resources and values. Esthetic effects to vistas from Park areas and along the Generals Highway also should be considered in timber management plans. Further, provisions to minimize the effects of timber harvest traffic through the Grant Grove area should be included in the timber management plan.

Pa e 4-18 and 4-79

34- The management direction Por Off Highway vehicles and its implication in relation to mineral exploration 2nd development on the Porest is very confusing. tbw does

the designation "limited to designated routes" affect mineral exploration? On page 4-19 (Zone C) what does the statement "...over 40% slope, or with vegetation which generally precludes travel;.." imply in relation to mineral exploration?

Page 4-21 — 35- Wild and Scenic River - South Fork of the Kern (Segment 1): A small portion of the river crosses public lands administered by the BLM in the vicinity of Pilots Nob. Prescribed management actions for this section should be coordinated with the Caliente Resource Area (Page 4-21 and 4-22 were ! twice in the Forest Plan).

Page 4-23 — 36- Trails and Wilderness. There is no mention of the dose coordination of wilderness management policies between the NPS and USFS nor of the fact that the Forest issues permits for many of the trailheads that eventually feed or pmvide access to the Parks. The Forest issues permits far trips that eventually enter the Park and we are dependent upon them to do so and appreciate very much their assistance and cooperation in this effort. Some mention ought to be made of this cooperation.

Page 4-32 — 37- Energy. We would he interested in any energy development proposal that could in any way affect the resources or values within the Parks.

Page 4-34 — 38- Management Prescriptions. No standards, goals and objectives. or restrictions are identified for mined activities mder any Prescription.

Page 4-37 — 39- Table 4.3 - Management &ea Prescription Summary. Note a significant concern is that the Rescription summary section cannot be readily related to a specific geographic portion of the Forest. This table lists a prescription code. 801 for Blue Oak savanna for example, but it is impossible to determine from the map which portion of the General Dispersed Recreation area is represented by that code.

Pages 4-38 thru 4-100 — 39- Management Area Prescriptions. We have no additional comments on the specific area prescriptions as described other than the comments made above. One exception is to reiterate the previous comment as it relates to these descriptions, there is no way to relate which portions of the various vegetative zones are represented by the pmposed management prescription. We recommend that the map show the area covered by each area prescription so that the reader can readily see what geographic portion of the Forest is covered by each proposed Prescription.

7

Page 5-1

40- Monitoring and E aluati dards. We courage a monitorin e and m t part of the p rpos fo ito ll is to 'i r Pl an r ll e revisions e needed. We a s note th th j a provision k r evaluation of t lt if t d fo update or modification There is no di r f th d fo update or for any ol or r agency r of gn f di s o the a We ev such a review process is in best i of th . the agency and th blic being erv A window for period c impc om who manage adjoi ing land is impc t.

Page App. A-1

41- rce a o r of keeping informed of ac tio o l s l waters adjacent to the pa the National Park Ser lc d appreciate the opportunity to review many of th esc l identified in this section he se we are p interested in are:

Dome Land Wilderness
Gold Tr it Wilderness
S Sierra Wilderness
Boundary Marking and pasting
Pacific Crest Trail Management Plan
North Fork Kern River Boating Management Plan
Kings River White Water Boating Management Plan
Fire Management Implementation Plan Corridor
Viewshed Plans
Jennie Lakes Wilderness
Monarch Wilderness
North Fork Kern River
Deer Herd Plans

DEIS Specific Comments

Page 38 Summary

38 - Alternatives: Minerals is not identified as a separate. specific market resource along with timber and recreation. As a result:

a. The preferred and current alternatives, which are based on 1980 and 1985 use levels, do not recognize. nor address opportunities lor mineral development (since none was occurring).

b. The other alternatives (especially the High Market Emphasis Alternative) do not recognize the market "potential" of future mineral development which could be significant (rentals and/or royalties from geothermal).

8

Page 2-36

42- Minerals and Geology (Forest-wide standards and guidelines). (These comments also apply to page 4-31 of the Forest Plan.)

This section indicates that surface resources are planned without considering mineral potential or possible restriction on mineral development. me tone conveyed is that proposed mineral projects would be authorized only when conflicts with previously planned surface resources could be resolved. If mineral resource development is considered only on a "case-by-case basis," it cannot be planned. Since the use of surface resources is being planned, any subsequent proposed mineral development will inevitably conflict dth this predetermined use.

43- Federal agencies are directed to foster and encourage orderly development of mineral resource by private industry. This direction is documented in the Mining and Minerals Policy Act of 1970, and the National Materials and Minerals Policy, Research and Development Act of 1980. The Bureau of Land Management's minerals responsibilities and authority include lands in the National Forest System. BLM is directed to make public land available for orderly and efficient mineral development under the principles of multiple-use management. This responsibility can only be accomplished if mineral resource development is given consideration equal to that of surface resources when formulating management objectives.

It is recamended that basic minerals guidelines refrain from emphasizing Me inpacts to surface resources caused by mineral development. Instead guidelines and standards should reference and briefly describe the following:

1) Minerals management policy - responsibility and authority of BLM on National Forest Land.
2) Surface Management Regulations pertaining to mineral development under the 1872 Mining Law (36 CFR 228).
3) Regulations and policy pertaining to mined material development (36 CFR 228.43).
4) Construction and maintenance standards for access roads, building sites. etc. (standard stipulations).
5) Since there are no leasable hardrock mineral resources on the Forest, this section would be an appropriate place to state this fact and explain the geologic conditions which make it true.

9

6) Policy and standards applied to geothermal leasing Reference 43 CFR 3201.1-3: leasing by USDI with USFS consent.

Page 2-36

me purpose, method and use of the geologic resource inventory is not stated either in the plan or the EIS. There is also no definition for "Order 3 standards." It is not clear whether or rat the inventory includes mineral resources.

44- It is recommended that an appendix be added which describes the geologic resources inventory, its purpose, and its effects on planning. "Order 3 standards" could be defined in the glossary, included in general guidelines mder "minerals," or described in an appendix. me purpose and effect of the inventory should be fully addressed. Of primary concern is the effect of the inventory on management objectives and possible plan amendments it my generate. Making minerals an issue would increase the flexibility of the plan and allow full use of the inventory. Also applies to page 431, Appendix 8-3 of the Forest Plan.

Pages 2-124 and 2-146 38- High Market Emphasis and High Production Emphasis. These alternatives, at least, should address the lifting of withdrawals from/closure to mineral development to be consistent with the definition of each alternative.

Page 3-22.6.a 10- Native American Populations. Same comments as noted under Forest Plan (3-8.6.a.).

Fage 3-23.6.a.2 11- Tubatulabal Indian Group. Same comments as mted under Forest Plan (3-8.6.a.2.).

Page 3-28.2 Paragraph 3 13- Cultural Resources. Same comments as noted mder Forest Plan (3-10.2. Paragraph 2).

Page 3-29 Paragraph 5 14- Cultural Resources. Same comments as noted under Forest Plan (3-10.2. Paragraph 7).

Page 3-71 38- Mineral potential ratings are not defined or supported by any referenced analysis. Without some background information forming the basis for these ratings. the reader has m way of judging their accuracy or applicability. Including a description of the rating process in "modeling and analysis" section of Appendix B would be most helpful. It may also be appropriate to reference available resource-inventory records maintained in a particular office.

Page 4-14

45- Summary of Socio-Economic Effects, Alternatives CED and PRF. Since the preferred alternative includes a proposal for major ski areas, we recommend there should be some indication of effects on the socio-economic situation of the area.

Page 4-17

46- Wildfires and Rescribed Burning. Where possible, prescribed fire and prescribed natural fire should be coordinated between the Forest Service and Parks to avoid temporary periods of cumulatively heavy buildup or smoke in local areas.

Page 4-29

47- 1) Soil Resource. me document predicts overall positive effects an soil productivity for the preferred alternative; however, it does not address the potential offsite effects to the park from timber harvest, especially in the Stony Creek area where the park lies downstream from the proposed timber harvest area.

Page 0-37.e

48- Energy Production and Conservation. No mention of e e me ajority f the Forest i i as p valuable by the USGS)

Page 0-39

49- Facilities. The preferred alternative includes a proposal for development of a major ski area in the Mitchell-Maddox area yet the facilities Section here, which describes roads, does not include a description of the potential effects of the construction of a major mad to access the ski area. While we recognize that a detailed analysis would be made in a future assessment, the fact that a mad would be needed for the proposed ski area and that there would be significant effects should be mentioned here. We have the same concerns regarding the proposed development as outlined above for the Plan.

page 4-45

27- 2) Wildlife. me statement does not adequately address the potential effects of the proposed action, whether positive or negative, at least for those species that depend cn both the Park and the Forest. There is no description of what potential effects managing for only one pair of California condors will have on the potential recovery or demise of the species. me same may be said for the other species that we addressed above in the section dealing with the Plan; spotted owl, willow flycatcher. pileated woodpecker, etc.

11

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Page 4-55.j

50- Lands, Alternatives PRF and CED. There should be some comment on the coordination of land line locations between the Forest and Park, where appropriate, and the potential effects of an accurate, as Opposed to an inaccurate, boundary.

Page 4-57

38- Contains the following statement: "Based on minimal mining activity.. .supply of minerals locally or regionally would not be substantially affected by actions proposed in the alternative."

This statement is only true for present supply and does not consider underdiscovered or subeconomic resources. This statement is also unsupported by facts or analysis given in the document. A major adverse effect of the alternatives may be the removal of lands from availability to mineral exploration or development, or, severe operating restrictions. It is recommended that mineral resources be included as an issue so that the EIS may fully address the impacts of surface protection/development to mineral resource exploration and development. A map showing the proposed withdrawals overlaid on a geologic map containing mines, prospects, mineral occurrences and known trends would be a useful tool Par such an analysis. This information is usually considered to be too detailed for a general land use plan; therefore, it is recommended that the plan merely show a map depicting the proposed withdrawals (overlaid on mineral potential) and include a statement that the implementation of a withdrawal will depend upon a site specific environmental assessment and mineral report to evaluate impacts to mineral resources.

Environmental Consequences.

This section evaluates the impacts to mineral resources in terms of acres to be withdrawn from mineral entry under each alternative. No information on the location of the withdrawals is provided; no mineral ie -e— data or analysis is present in the document. Without this information, the reader is unable to relate the action to its impacts on-the-ground. A map, depicting proposed withdrawals and mineral potential areas, would correct this deficiency. The method used to determine the mineral potential of an area should be presented in an appendix.

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2709

It should also be noted that a site specific land report and mineral report is required, in most cases, before a locatable or leasable mineral withdrawal will be considered by the Secretary of the Interior (Federal Land Policy and Management Act of 1976, Sec. 204(c)(2)(12); 90 STAT 2752).

Page 4-57

51- Using table 4.24 the range of alternatives proposing mineral withdrawals in areas of very high, high and medium mineral potential aggregating varies from 19% to 22% of the Sequoia National Forest. This is an increase of 4% to 9% over the base year 1982. Roughly 1/5 of the Sequoia National Forest is, or is proposed, to be withdrawn from mineral entry. It is recommended that alternatives be considered which reduce the [illegible] of [illegible] lands, [illegible] a ratio [illegible] is [illegible] to why this option [illegible] consider[illegible] In [illegible] increase in the [illegible] withdrawn should be included on page 16, as a key [illegible] tal cons[illegible]

Page 4-57

52- [illegible] Pa[illegible] firm ci[illegible] a[illegible] tl point on blanket administrative with [illegible] rals from [illegible] are pre[illegible] [illegible] is [illegible] [illegible] t [illegible] [illegible] ly [illegible] [illegible]). Even low temperature geothermal so[illegible] [illegible] space eati[illegible] buildings, [illegible] icing roads [illegible] [illegible] s [illegible] similar app[illegible] ions which se[illegible] recreation pu[illegible]s

Page 4-65.a

24- Recreation, Alternative PRF. Far the proposed Mitchell-Maddox downhill ski area, the statement fails to address the potential effects of such a development on the overall pettern and numbers of forest recreation users.

Pages 4-97 and 4-108

33- Timber and Vinal Resources (respectively). Between these two sections there is only superficial treatment of the effects of the timber harvest as proposed in the preferred alternative. While there are goals in the draft management plan to retain high quality visual resources from Highway 180 and the Generals Highway, there is no specific mention of the effects of timber harvest on these highways. Yet it is clear that timber harvest areas as depicted in the maps will be visible from portions of these highways.

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Page 4-138

53- Paragraph 6. The purpose of this EIS is to address impacts to and from other resource decisions (since Minerals is not identified as an issue). Management has the flexibility to limit and prohibit mineral development in any area by limiting access (withdrawal classifications. etc.) when impacts are addressed through the EIS process. To say the irreversible actions are outside the scope of this EIS is incorrect.

Page 5-1

List Of Preparers

54- Neither of the mining geologists are credited with input to the "Environmental Consequences" section. Input is limited to descriptive information for the "Affected Environmental" section.

It is recommended that a minerals specialist be a member of the team preparing the plan, since this field requires unusual technical expertise, industry and economic familiarity, and application of mining law and mineral policy. This is especially important when mineral resources is an issue.

Maps

55- We recommend that maps should reflect BLM management designations for that particular resource activity or mt delineate BLM land at all. me problem exists where USFS lands are designated for ORV activities and BLM lands around Chimney Peak stand out from all other lands as white in color which could be interpreted as "undesignated." They would then be vulnerable to Increased unauthorized ORV activities.

56- After reviewing the Environmental Consequences section, we have the general impression that description of the effects of the various proposals appears superficial. Much of what should be description of effects is actually more discussion of the proposal alternatives.

57- Specific Resource Program Comments

Wild and Scenic Rivers

We support the Plan's pmposed designation, under the National Wild and Scenic Rivers Act of the South Fork and Middle Fork of the Kings River which are also located within Sequoia and Kings Canyon National Park. also we compliment the Forest on its efforts to evaluate the Nationwide Rivers Inventory segments contained an the Forest. However, with respect to the Kings River, we note that evaluation has been deferred on Segment I because it muld be inundated if the pmposed Rodgers Crossing Dam is constructed. Since a decision on whether or not to construct this project has not been made, the eligibility of Segment I should be evaluated in order that this

factor can be considered in determining the impacts and environmental tradeoffs of the project. It would be more proper to defer on the suitability question for this river segment rather than eligibility, which addresses the current condition of the river regardless of future proposed uses.

Cultural Resources

58- the accompanying Forest Plan does not satisfactory address cultural resources (i.e., only 1 or 2 pages total count contain any information on prehistoric or historic resources compared with well-developed section on Other resources and activities the Forest must deal with).

It is stated that the Forest has a completed cultural resources overview which is a positive initial step now that 20% of the Forest has been inventoried and approximately 1,100 sites are known, many of them significant. This is an excellent base for the Forest to develop a real management plan which might provide — in addition to the legislative mandates and the compliance process — a series of projected (5-year) management directives/objectives/alternatives with a discussion of how each directive will be implemented. Clearly the Forest has a known series of projected actions (i.e., mad construction, reforestation, perhaps mineral leasing, etc.) that will affect cultural resources. Schedules for survey should be presented then revised on an annual basis. For known sites -- which ones are scheduled for fencing/signing or other interpretation? Are any sites scheduled for research through data recovery? What about public education prefects Mat my be scheduled? Is there a monitoring program and how is it conducted?

The development of the recommended management plan should be coordinated with the State Historic Reservation Office to insure compatibility of goals with the State's Comprehensive Reservation Planning Process. .

The DEIS satisfactorily addresses cultural resources, although several minor problems should be noted:

1. the document contains no Table of Contents which makes location of pertinent cultural resources data and alternative actions being discussed difficult.

2. The range of known site types is not discussed in the archaeological overview.

3. Pertinent legislative mandates regarding cultural resources are listed, however, not discussed. me laws are llsted in the Glossary Appendix of the MIS, but there is no reference with the text that the information may be found there.

4. No definition of an archaeological site is presented in the Glossary; in fact, except for several pieces of legislation, the Glossary is deficient in cultural resources definitions.

5. One discrepancy appears on page 3-29; it is stated that about 1,100 sites have been recorded and that 235 have been evaluated for significance (paragraph 2). The succeeding paragraph (3) then goes on to state that "roughly 15% of recorded properties have been evaluated for significance." These two figures should be reconciled.

Mineral Resources

59- As the preceding comments strongly indicate, my concerns revolve around the issue of minerals and the scope of minerals average in both the plan and the DEIS. For example, there is insufficient discussion of the probable effects of renewable resource prescriptions on mineral exploration and development, with the exception of the impacts of wilderness and other types of withdrawals on mfneral access. Yet Forest Service planning regulations, 36 CFR subpart 219.22(f) calls for the forest planners to determine the probable effect of renewable resource prescriptions and management direction on mineral resources and activities, including exploration and development. Our review has shown that, with regard to minerals and mineral development, these documents are deficient. The data that is present on mine? is vague, inconclusive, and difficult to understand.

To rectify these deficiencies, we suggest the following be added to the report:

1 A map which shows all available mined land within the forest and its corresponding potential for minerals.

2 Maps which show the availability of mfneral land with respect to management restrictions and mineral potential under each alternative.

3 A table under each alternative which correlates the total number of acres of each category of mineral potential which are to be withdrawn with the total number of acres of each category of mineral potential which exist in the forest.

4. A table under each alternative which correlates the total number of acres of each category of mineral potential which will be restricted through management policies with the total number of acres of each category of mineral potential which exist in the forest.

5. Discussion of all of the above.

6. Discussion of how each of the alternatives will affect minerals and mineral development.

of the Forest plans and DEISs reviewed this year, those from Region 1 were clearly the best with regard to minerals. We recommend the EISs and Forest Plans from the Helena and Beaverhead National Forests as examples of excellent format and context. We are enclosing tables from each as specific examples.

16

One change in the Plan and EIS would go a long way in presenting a clearer picture of the role of minerals in overall Forest Service planning, and would do much to alleviate the impression of a negative, reactionary approach to dealing with minerals. That change is the inclusion of a detailed minerals policy statement - under "Forest Goals" in the Plan, and
43- under "Direction Common to all alternatives" in the DEIS. The Pacific SW Region of the Forest Service is currently working on such a policy which will resemble the minerals policy of the BLM. Whether the policy is officially complete or mt, there is available bmad objectives with respect to mineral policy which can be stated or paraphased in these documents. If the Forest Service is not prepared to make a specific or general minerals policy statement, then the minerals policy of the BLM, whfch currently has minerals responsibilities on the Forest. should be used. This is critical if the public and future managers seeking direction from this Plan are to know what the planning objectives are.

Such planning objectives are clearly laid out for virtually all major forest resources except minerals, Chapter I, Section 8 of the Plan. This is the Vision Statement, which spells out the goals of the Forest with respect to 11 bmad objectives having public benefit. The need to include mineral objectives in the Vision Statement is all the more critical as a result of the anticipated shift of full mineral responsibility and authority from BLM to the Forest Service mder the interchange.

We appreciate the opportunity to comment on these documents.

Sincerely,

Patricia S. Port

Patricia Sanderson Port
Regional Environmental Officer

Enclosures
Examples of Mineral Tables

cc:
Director, DEPR w/incoming
State Director, BLM
Regional Director, NPS
Regional Director, S
Regional Director, BR
Chief, BM

Category A — Withdrawn or proposed for withdrawal from mineral entry.

1. Wilderness areas.
2. Wild and scenic rivers
3. Sites for facilities
4. Historic and cultural sites
5. Developed recreation sites.

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Category B — Statues or executive orders require specific protection or mitigation measures.

1. Proposed wilderness areas.
2. Congressionally mandated wilderness study areas.
3. RARE II Further Planning arras.
4. T&E Species.
5. Roadless (Type I) dispersed recreation areas.
6. Culturally significant areas.

Category C — Special conditions exist on lands which require special lease stipulations or plan of operation conditions.

1. Big game winter range.
2. Elk calving area.
3. Riparian area.

Category D — Standard lease stipulations and plan of operation conditions apply.

1. Timber production areas.
2. Existing mineral processing areas.

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Table II-11

Mineral Evaluation Report

Alternative A

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	101,081	230,311	0	0	A	0	193,812	66,868	70,612
B	12,765	172,068	16,648	2,395	B	0	42,167	6,927	154,782
C	972	104,542	1,858	722	C	0	50,639	10,238	47,217
D	58,218	875,119	357,782	213,140	D	0	856,082	340,999	307,178

Alternative B

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	101,081	76,532	0	0	A	0	177,613	0	0
B	2,471	116,094	19,317	3,369	B	0	35,877	10,914	94,460
C	29,666	467,929	220,241	115,770	C	0	474,729	191,967	166,910
D	39,818	721,428	136,762	97,043	D	0	455,906	221,941	317,204

Alternative C

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	128,066	481,154	329,998	165,242	A	0	704,850	267,623	131,987
B	3,835	105,873	223	110,690	B	0	27,091	7,832	75,767
C	10,889	169,777	8,569	11,263	C	0	95,162	29,873	75,463
D	30,246	625,104	37,530	38,993	D	0	315,597	119,704	296,572

Alternative D

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	127,970	402,124	201,920	125,976	A	0	564,337	193,234	100,399
B	4,072	207,232	44,843	14,872	B	0	83,296	49,076	138,657
C	22,309	302,479	50,680	24,115	C	0	190,031	68,515	141,037
D	18,685	470,073	78,877	51,294	D	0	305,026	114,207	199,696

Table II - 11 cont.

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Alternative F

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	112,520	326,993	40,857	125,976	A	0	433,889	98,997	73,460
B	5,277	112,218	29,458	12,822	B	0	46,025	23,517	90,233
C	38,575	560,449	151,230	36,396	C	0	370,867	180,352	235,431
D	16,664	405,538	123,090	49,458	D	0	291,919	122,166	180,665

Alternative G

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	101,081	85,511	40,857	0	A	0	225,309	2,140	0
B	3,004	139,404	0	0	B	0	18,517	12,730	111,161
C	33,572	459,851	188,380	97,431	C	0	446,052	178,442	154,740
D	35,379	697,507	147,083	118,461	D	0	454,037	231,720	312,673

Alternative H

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	101,081	152,261	12,907	0	A	0	126,769	68,868	70,612
B	95	185,669	13,068	0	B	0	42,368	63,272	93,192
C	27,092	466,101	226,368	132,792	C	0	503,529	197,358	151,466
D	44,768	566,754	135,220	83,345	D	0	397,530	154,971	277,586

Alternative I

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	128,405	809,421	330,757	168,615	A	0	868,419	329,759	259,020
B	1,750	66,933	636	943	B	0	6,136	1,462	62,664
C	9,885	116,556	3,679	9,090	C	0	80,952	11,709	46,549
D	32,996	388,998	41,248	37,609	D	0	207,193	82,102	211,556

Alternative W

Energy					Non-Energy				
Access Category	Low	Mod	High	Very High	Access Category	Low	Mod	High	Very High
A	118,629	355,544	32,039	0	A	0	304,971	106,567	94,674
B	1,561	91,450	1,966	3,225	B	0	21,094	8,748	68,360
C	38,655	506,842	170,956	119,536	C	0	437,432	176,320	222,237
D	14,191	428,072	171,359	93,496	D	0	379,203	133,397	194,518

The amount of elm high and vary high potential oil and gas lands available for development, with only standard Forest wide surface protection requirements varies from a low of 28% in the Wilderness Alternative J to a high of 7X in the RPA Alternative B. The Preferred Alternative E has 64% of the high and very high potential oil and gas lands completely available for development with only standard restrictions.

The amount of high potential lands that are completely unavailable far oil and gas development because of existing and proposed mineral withdrawal varies from a la of 10% in the Commodity Alternative C to a high of 672 in the Wilderness Alternative J. The Preferred Alternative E would result in 13% of the high potential oil and gas lands being unavailable for development. This includes portions of the existing Scapegoat Wilderness and the proposed Big Log addition Lo the Gates of the Mountains Wilderness that would be withdrawn from mineral entry.

TABLE II-13

Non-Energy Minerals
(Percent of high and vary high potential
hods going to various management categories

Alternative	Management Category A-totally restricted	B-highly restricted	C-moderately restricted	D-standard restrictions
A-current direction	0%	9%	9%	83%
B-RPA	at	62	14%	80%
C-high commodity	0%	6%	20%	74%
D-economic efficiency	0%	9%	18%	73%
E preferred	0%	U	34%	622
E-departure	0%	4%	34%	62Z
F-wilderness/ commodity	10%	2%	162	67%
G-high amenity	1%	1%	11%	61%
H-wildlife	0%	9%	40%	51%
J-wilderness	32%	7%	10%	51%

Helena N.F.

U.S. Department of Interior

Resolution:

1. Please note that the Forest Plan is to be thoroughly revised in 10-15 years. Please see Chapter 5 of the Forest Plan for the Monitoring Plan.

2. Please see the revised Vision Statement (Chapter 1, Section B of the Plan) for a more comprehensive look at the future of the Sequoia National Forest.

3. The Forest Plan may be appealed within 45 days of the date of the Record of Decision.

4. Neither the public nor the Forest Service identified minerals as important enough to qualify for either a public issue or a management concern. The Sequoia National Forest is not a highly mineralized area. It has been heavily prospected in years past and is currently under scrutiny by many prospectors. There is only one operating mine on the Forest and it employs only one person. For over a million acres of land, this speaks volumes on the importance of minerals on this Forest.

   Within the planning period, prospecting will continue; however, few. if any, mines are expected to materialize. If, for some reason, the minerals picture reverses itself, changes to the Plan can be recommended.

5. There is a great difference between proposal and actualities. Pages 2-9 of the Draft Forest Plan say no actuality is anticipated, pages 3-14 of the Draft say several proposals have been made. There is no conflict in these two statements. Also, the Monache proposal has been turned down since publication of the DEIS.

6. Restrictions on stream and wetland protection will not eliminate or even severely restrict mineral exploration. Very few mining operations on the.Sequoia are in or near streams or wetlands.

7. This is an annual amount.

8. Thank you.

9. While miners.have an interest in the Forest, they are not considered a separate social group. Most miners would be considered part of the "Working Family" group.

10. Thank you for pointing out this omission. A reference to the Kawaiisu has been added.

11. This section has been corrected to reflect your comment by dropping the last sentence.

12. Recent information indicates that there may be more opportunity for pollutant transport into the Forest from the Kern oilfields than previously thought. In light of this information, Sequoia National Forest plans to monitor in the Kern River drainage near the southend of the Dome Land Wilderness as funding becomes available. Sequoia National Forest is currently communicating concerns to the California Energy Commission and EPA.

13. The test has been corrected to clarify the discussion.

14. The correction has been made -- Thank you for pointing out this error.

15. This typing error has been corrected.

16. A discussion of flood hazard and floodplain management is in Chapter 3, Section C.22.d. of the Plan.

17. Changes in the EIS and Plan reflect the Forest's legal requirement for management of sensitive, rare, and threatened and endangered species. The Little Kern golden trout is a federally listed, threatened species for which a recovery plan has been prepared. The Forest will follow that recovery plan in an effort to increase numbers of Little Kern golden trout. See also Chapter 3 of the FEIS.

18. A short paragraph expanding this discussion pertaining to pest impacts other than timber management has been added to this section.

19. We currently have only one operating mine on the Forest and it has not yet been through a validity hearing.

20. To date, prospectors, and the miner, have been willing to do those things that reasonably mitigate potential damage to the environment that would occur through their operations. This is not a large enough issue to fully deserve an examination. On-the-ground, the present low-profile system is working.

21. Such an assessment is not needed for this planning period.

22. By far the greatest proportion of visitors to the Sequoia National Forest come from the Los Angeles Basin. About 90 percent of all visitors originate from there.

23. The deficiency noted in this table has been corrected.

24. We appreciate the concerns expressed about the effects of a ski area developed at Mitchell-Maddox. As is pointed out in this section of the Plan, Mitchell-Maddox is just one of the sites on the Sequoia NF which appears to be most promising for development. The computer modeling used for the Plan picked up development of these sites because of their apparent positive economic values.

It is important to understand that computer modeling merely provided an indication to consider development in the future (versus not considering any additional developments). Before any decision is made

on any future ski area development, it will be necessary to follow NEFA requirements--that is, prepare a Project Level Environmental Impact Statement. As part of this effort, issue identification/ scoping will occur. Full public participation (including coordination with the National Park Service) is an integral part of the process. Concerns such as those identified would most certainly be identified and dealt with in detail during this study. As in all evaluations of this nature, a no-action scenario (continuation of current management activities) would be an alternative. Finally, demand for additional facilities of this type will trigger the NEFA process. If there is little or no demand, there will be no need to pursue a study.

25. We have corrected the reference to the PCT on this page.

26. Analyzing potential impacts to a very small program is not cost-effective and has not been identified as an issue or a management concern.

27. The Plan has been revised to follow the California Condor Recovery Plan.

28. Please see changes to the EIS and Plan that show the Forest is following Regional Guidelines. Spotted owl population surveys have been conducted on Sequoia NF since the 1970's. Beginning in 1982 work began, using Region 5 Guidelines, to establish a network of spotted owl habitat areas across Sequoia NF. In 1987, with the completion of field surveys a network of 40 habitat areas totalling 66.000 acres was established. The only harvest of timber that has taken place in any of the habitat areas since their establishment was the harvest of timber already under contract in those areas. In many cases even this timber was substituted for timber volume located outside of the habitat areas. For more details on current spotted owl management on Sequoia NF, please see Chapter 3 of the FEIS or Plan. Also see Appendix B of the Plan for identified research needs for the spotted owl.

Space is considered as a habitat element in Chapter 3 of the FEIS. The pileated woodpecker is classified as a Special Interest Species by the Forest Service, not a sensitive species and consequently there is no special management considerations. Its habitat needs will be met by the Plan's provisions for the retention of five percent old growth and special management of riparian and meadow influence zones. Please see expanded portions of the FEIS and Plan for details of the management of the spotted owl and goshawk.

29. Phacelia nashiana and Carex tompkinsii are listed in the revision in Chapter 3. Calochortus straitus and Mimulus pictus are no longer listed as sensitive.

30. Changes in the EIS and Plan reflect the Forest's legal requirement for management of sensitive, rare, and threatened and endangered species. Welfare of the flora and fauna is a high priority. However, we are mandated to manage for a variety of uses which limits the

concentration on a single resource such as wildlife. See also Table 3.15, Chapter 3 of the FEIS.

31. Chapter 3, Section C.7 of the Forest Plan shows revised text.

32. Reserves are normally expressed in tonnages and there are very, very few mineralized areas that have large reserves. The acreages cited reflect only the broadest type of geologic data. Scrutiny by prospectors and development of mines is by far a better measure of mineral value.

33. There is not a specific discussion of effects of timber harvest along highways on the Forest, nor is one deemed necessary. By definition, the sensitivity levels assigned to roads lead to Visual Quality Objectives (VQO's). The VQO's set limits for visual treatments and, thereby, relate to the effects on highway views. Specifics are discussed in project level environmental analyses.

34. The OHV Management Direction for the Sequoia NF has been modified considerably from the Draft Plan. The final direction does not include any limited (open) areas where OHV travel of designated routes is permitted.

    Specifically relating to mining activities, incidental access of designated routes can be permitted (see item b under Zone B under the revised write-up in the Plan, Chapter 4). Those involved in varying phases of mineral prospecting, exploration or development would be included under this heading. The reference to "...over 40% slope, or with vegetation which generally precludes travel..." was meant to give readers an understanding that much of the National Forest is not conducive to OHV travel--most folks could not or would not be able to ride in these areas. Again, mineral related activities will be covered under operating plans and, therein. are different than the rules which apply to general recreationists.

35. Since no recommendation for W&SR is proposed, management involvement by the F.S. on river segments outside the N.F. boundary is not envisioned. If, per chance, a change in our recommendation occurs, and this segment of the river is included in W&SR legislation and is so designated, F.S. involvement in planning will be necessary. In this case, coordination with the Caliente Resource Area would be appropriate.

36. A Standard and Guideline to our Recreation section has been added which prescribes our continuing working relationship with the NPS in coordinating management activities (see FEIS Chapter 2, Forest-wide S&G's and Plan, Chapter 4). Further, some wording has been added to Chapter 3 of the FEIS and Chapter 2 of the Plan to highlight this coordination.

37. See 36 above. Again, coordination with the NPS will be a part of our Plans.

38. In our judgement, the program is not large enough or of general public concern to warrant this level of detail in the Plan. NEPA requirements will result in appropriate levels of public involvement.

39. In determining which prescription attaches to which area, the reader must determine the vegetation type from the Vegetation Map and the management emphasis from the Management Emphasis Map. The prescriptions listed on Table 4.3 of the Plan are specific to the combinations of these found on the Sequoia NF. The page number of each prescription is then indicated on the table.

40. As a matter of course, the Forest Plan will be revised within 10-15 years. It is also possible that an inability to meet the standards set out in the Plan will trigger an earlier revision.

41. The National Park Service is welcome to review any of these.

42. Conflicts between legal planned and legal unplanned activities are resolved through vegetation, mitigation and possible revision. There have been no unresolvable conflicts to date.

43. As to a Minerals Policy, this item is being formulated at the Regional Level and would be incorporated into this Plan.

44. Order 3 Geologic Resource Inventory has been added to the glossary. The purpose of this inventory is to describe regional geologic factors and designation of these factors as well as geologic resources. It would also address how these affect land allocations, general facility locations and management alternatives. Additional information is available in Exhibit 1 of FSM 2881.

45. All ski areas will be the subject of separate project EIS's in which socieconomic effects will be analyzed at length.

46. Prescribed fire and smoke management coordination between Sequoia National Forest and Sequoia and Kings Canyon National Parks is addressed in Chapter 2, Section E, Direction Common to All Alternatives.

47. Our goals in managing the forest are a) to maintain the long-term productivity of the Forest's soils, and b) to prevent any significant reductions in water quality. We are committed legally, morally, and professionally to meeting these goals. Consequently, we designed each of the alternatives to meet these goals. Some of the alternatives would result in less soil erosion, but all meet our goals of protecting soil productivity and water quality.

48. Geothermal resources are considered to be of minor importance on the Sequoia NF at this time. Little interest has been shown in this area and there has been no development for heating or power.

49. The proposed road will also be included in the site-specific EIS for the Mitchell-Maddox area. We prefer to deal with all of the effects

of the proposed project in that document rather than splitting the analysis between trio documents.

50. The location of land lines between National Forest Systems land and other Federal land will be done eventually, but it is of low priority. Generally, conflicts between Federal agencies are either minor (and solved on the local level) or major (and solved at the National level). Neither has a place in this Plan.

51. It should be noted that the area withdrawn from mineral entry in base year 1982 consists of 98 percent wilderness and 2 percent other. Wilderness is created by Congress and would only be deleted by Congress. The 2 percent that is not in wilderness is not a significant management concern. On a case-by-case basis, it could be important for one project, but for planning purposes, probably not.

52. The withdrawals are not "blanket" withdrawals because they address very specific areas. In addition, the withdrawal process includes an environmental assessment. Preclusion of use of geothermal or other mineral resources would, by necessity, be carefully weighed.

53. We maintain that such (irreversible) actions are outside the scope of this EIS. The decision to mine is not in our control. It is generated by outside interests and our ability to limit access is very limited. It is also not something that can be accomplished in a short time, nor is it something we should do. Our aim would be to encourage the extraction of valuable minerals and to insure that environmental concerns are addressed and mitigated as needed.

54. Our minerals specialists were consulted constantly in the preparation of the Plan.

55. A good point has been raised. In order not to create a wrong impression with readers, maps have been modified to include a tone so that BLM lands do not show as totally white in color.

56. We hope that Chapter 4 is more substantive in the FEJS than in the DEIS.

57. *The* final EIS has been modified to include eligibility information on Segment 1 of the Kings River, as requested. Suitability information is not included, and a recommendation on Wild & Scenic River designation will continue to be deferred. Enactment of current legislation could resolve all of the questions about this portion of the Kings River.

58. A) As stated on 1-10 "planning is an issue driven process." Cultural Resource Management was not identified as an issue during the initial scoping process. Consequently, cultural resources are not discussed in the same detail as some other programs and resources which were identified as issues for this plan.

B) The purpose of the LMP is to set goals for overall Forest management. Most of the detailed information which is suggested

here for inclusion in the EIS is more appropiately developed and presented in activity plans. This will be done as an outcome of the Forest Planning Process. One must also keep in mind that the Forest CRM Overview (Cultural Resources Overview of the Southern Sierra Nevada (1984)) is incorporated by reference in the Plan and provides considerable information relative to this program. Coordination with the State Historic Preservation Office is ongoing and will occur as part of our detailed planning efforts.

C) 1) This level of detail in the table of contents is not deemed necessary--if added, it would throw cultural resources out of balance with other resources.

2) Please review the Cultural Resources section of Chapter 3. A technical discussion of each site type is not necessary to an understanding of cultural resources as an affected environment. For a more scholarly exposition, please consult the Cultural Resoures Overview for the Sequoia NF, incorporated by reference as part of the Forest Plan.

3) The legislative mandates for cultural resources are not discussed; this is not deemed necessary in this type of document. However, a general overview of the compliance process is presented for information under Cultural Resources, Chapter 3.

4) We have reviewed the glossary in light of your comment. In our opinion, no additional definitions are necessary for the general public to read and interpret the cultural resource narratives.

5) You are correct. This discrepancy has been corrected.

59. Much of what you suggest is available in working papers. Comparing the Sequoia with Region 1 is fraught with error, since they are a highly mineralized area and numeral concerns and issues are at much higher levels.

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IN REPLY REFER TO:

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CA-930.12

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

RECEIVED
4/30
MP Staff

ER 85/1699

APR 29 1986

Mr. Zane Smith
Regional Forester
U.S. Forest Service
630 Sansome Street
San Francisco, CA 94111

Dear Mr. Smith:

We have reviewed the Sequoia National Forest Proposed Plan and DEIS and have the following comments:

COMMENTS AND OBSERVATIONS SPECIFIC TO THE PROPOSED FOREST PLAN:

Pages 2-1 thru 2-11 — 4- Neither the Forest Plan (pages 2-1 *thru* 2-11) nor the EIS (pages 1-3 to 1-10) identifies mined exploration and development as an issue or concern associated with the management *of* the Sequoia National Forest, yet the Bureau of Land Management has frequently voiced their concerns regarding *the* development of mineral resources on the forest, Geothermal Leasing in Monache Meadows being the most recent example.

Solution — 4- Minerals exploration and developrent including impacts of implementing renewable resource standards, guidelines and related derisions on mineral resources should he treated as an issue in the Sequoia NF. planning process.

Pages 2-9 — 5- "No new *energy* production is anticipated in the next 10 years."; however, on 3-14 it is stated, "Preliminary proposals for additional generation capacity of 23 Megawatts have been made." and "Potential energy development will most likely be an expansion of existing or construction of new hydroelectric facilities." Also this does not reflect *the* geothermal potential in Monache for, at least, exploration.

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Page 2-11

6- Tradeoffs between stream and wetland protection, and the production of goods and services. This could also eliminate or severely reduce mineral exploration and development in the zone. This impact should be identified and discussed.

Page 3-6

9- Social Groups in Foothill Communities. Valid mining claims impart real property rights on National Forest public land. To exclude the major property right holders from this "Social Group" section seems misleading. especially in light of the fact that historically, most of the foothill communities began as mining communities.

Fage 3-8

6.a. Native American Populations.

10- This section refers to Native American populations *within* the Forest but does not identify the Kawaiisu Indian group. Since the Kawaiisu traditionally occupied *the* southem portion of the Forest Plan area and some descendants of the Kawaiisu still live in the region perhaps this group should be identified in the plan.

Page 3-8

6.a.2) Tubatulabal Indian Group.

11- me statement concerning commercial pinyon nut gathering suggest that the Forest is currently *issuing* commercial permits. It *is* our understanding that commercial pinyon nut harvesting within the Forest has not occurred in the past nor at the present time. If *this* sentence relates to the *1982* contact on BLM in the Chimney Peak area, "complete with commercial gatherers" is probably not an accurate description of the situation. mere have been only a few commercial permits issued by the BLM during the past 10 years and these were mt within Rockhouse WSA. me permits were issued *only* after evaluating the crop to determine that there was not significant reduction in the availability of nuts for the general public (noncommercial use) and for wildlife.

Page 3-10

2. Cultural Resources.

13- Paragraph 2. *This* paragraph refers to food processing sites and bedrock mortars as *though* they were different types of cultural features. To clarify the sentence, perhaps it should read as follows: me most common archaeological site types include lithic scatters. bedrock milling features, middens, rock art, and Ltthic quarries.

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	14-	Paragraph 7. me paragraph refers to 35 CFR 50.5 as containing the criteria for evaluation of site significance. me reference number is incorrect, it should be 36 CFR 60.4.
	15-	Paragraph 7. The last sentence refers to ethic which is incorrect. me ethic should he deleted and replaced with ethnic.
Page 3-26	19-	Paragraph 6 *...five mines in operation." " Do these mines process valid existing rights? If so, it should be specified so the public is not Confused with the segregative effects of wilderness designation.
Page 5-27	20-	The 3rd paragraph, 2nd sentence, last clause states "...,the Forest is open to mineral development subject to the mitigation of impacts to surface resources." Yet the inpacts of implementing this standard on mineral exploration and development are not addressed in the DEIS.
Solution	21-	Assess the impacts on mineral exploration and development of the implementation of renewable resource standards, guidelines and decisions that tend to limit, restrict or inhibit development of the mineral resources. This assessment should he not only for the proposed action, but all alternatives.
Page 3-33	25-	2nd paragraph 8th line - "Pacific Crest National Recreation Trail" should read Pacific Crest National Scenic Trail.
Page 4-2, 4-3 4-4	26-	Forest Goals have elements whfch are potentially negatively impacting to mineral resource exploration and development, yet these potential impacts are not addressed in the EIS or identified in the EIS summary or Environmental Consequences section. Typical examples are found in Recreation items 9 and 10 on page 4-2, Wildlife and Fish item 1 on page 4-3, and Water, Soil and Air item 3 on page 4-4.
Page 4-3 k Minerals	32-	me statement. "The Sequoia National Forest contain few large reserves of highly valuable minerals" is contradictory to EIS summary (page 12) which indicates that the forest contains 670,000 acres of medium and 335,000 acres of very high/high mineral potential for gold, uranium, and tungsten.

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Pages 4-18 and 4-19	34-	The management direction for Off Highway vehicles and its implication in relation to mineral exploration and development on the forest is very confusing. How does Me designation "limited to designated routes" affect mineral exploration? Gr page 4-19 (Zone C) wnat does the statement "...over 40% slope, or uith vegetation which generally precludes travel.. ." imply in relation to mineral exploration?
Page 4-21	35-	Wild and Scenic River - South Fork of the Kern (Segment 1): a small portion of the river crosses public lands in the vicinity of Pilots Nab. Prescribed management actions for this section should be coordinated wrth the Caliente Resource Area (Pages 4-21 and 4-22 were printed twice in the Forest Plan).
Page 4-3b	38-	Management Prescriptions, No standards, goals and objectives, or restrictions are identified for mineral activities under any Prescription.

COMMENTS AND OBSERVATIONS SPECIFIC TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Page 3.8. Summary .	38-	alternatives: Minerals is not identified as a separate, specific market resource along with timber and recreation. As a result:

a) me preferred and current alternatives, which are based on 1980 and 1985 use levels, do not recognize, nor address opportunities for mined development (since none was occurring).

b) me other alternatives (especially the High Market Emphasis Alternative) do not recognize the market "potential" of future mineral development which could be significant (rentals and/or royalties from geothermal).

Page 2-36	42-	Minerals and Geology (Forest-wide standards and guidelines). (These comments also apply to page 4-31 of the Forest Plan.)

This section indicates that surface resources are planned without considering mineral potential or possible restriction M mineral development. The tone conveyed is that proposed mineral projects would he authorized only when conflicts with s: planned r'ice esources could be resolved. If m resource development is considered o , cn a "case-by-case basis," it cannot be planned. Since the use of

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surface resources is being planned, any subsequent proposed mineral development will inevitably conflict with this predetermined use.

43- Federal agencies are directed to foster and encourage orderly development of mineral resource by private industry. This direction is documented in the Mining and Minerals Policy Act of 1970, and the National Materials and Minerals Policy, Research and Development Act of 1980. The Bureau of Land Management's minerals responsibilities and authority include lands in the National Forest System. BLM is directed to make public land available for orderly and efficient mineral development under the principles of multiple-use management. This responsibility can only be accomplished if mineral resource development is given consideration equal to that of surface resources when "" dating management objectives.

It is recommended that basic minerals guidelines refrain from emphasizing the impacts to surface resources caused by mineral development. Instead guidelines and standards should reference and briefly describe the following:

1) Minerals management policy - responsibility and authority of BLM on National Forest Land.
2) Surface Management Regulations pertaining to mineral development under the 1872 Mining Law (36 CFR 228).
3) Regulations and policy pertaining to mineral material development (36 CFR 228.43).
4) Construction and maintenance standards for access mads, building sites, etc. (standard stipulations).
5) Since there are no leasable hardrock mineral resources on the Forest, this section would be an appropriate place to state this fact and explain the geologic conditions which make it true.
6) Policy and standards applied to geothermal leasing Reference 43 CFR 3201.1-3: leasing by USDI with USFS consent.

Pages 2-25 thru 2-28 of the "Draft Coast/Valley Resource Management Plan and EIS" (Attachment 1) are included as one example of the "standard operating procedures" for mineral resources.

Page 2-36 44- me purpose, method and use of the geologic resource inventory is not stated either in the plan nor the EIS. mere is also no definition for "Order 3 standards." It is not clear whether or not the inventory includes mineral resources.

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		It is recommended that an appendix be added which describes the geologic resources inventory, its purpose, and its effects on planning. "Order 3 standards" muld be defined in the glossary, included in general guidelines under "minerals," or described in an appendix. me purpose and effect of the Lnvmtory should he fully addressed. Of primary concern is the effect of the inventory on management objectives and possible plan amendments it may generate. Making minerals an 'issue would increase the flexibility of the plan and allow full use of the Inventory. Also applies to page 431, Appendix 8-3 of the Forest Plan.
Pages 2-134 and 2-146	38-	High Market Emphasis and High Production Emphasis. These alternatives, at least, should address the lifting of withdrawals from/closure to mineral development to be consistent with the definition of each alternative.
page 3-22 6.a.	10-	Native American populations. Sam comments as noted under Forest Plan (3-8 6.a.).
Page 3-23 6.a.2	11-	Tubatulabal Indian Group. Same comments as noted under Forest Plan (3-8 6.a.2).
page 3-28 2 Paragraph 3	13-	Cultural Resources. Same comments as noted Under Forest Plan (3-10 2 Paragraph 2).
Page 3-29 Paragraph 5	14-	cultural Resources. Same comments as noted under Forest Plan (3-10 2 Paragraph 7).
Page 3-71	38-	Mineral potential ratings are mt defined or supported by any referenced analysis. Without sone background information forming the basis for these ratings, the reader has m way of judging their accuracy or applicability. Including a description of the rating process in "modeling and analysis" section of Appendix 8 would be most helpful. It may also be appropriate to reference available resource inventory records maintained in a particular office.
page 4-37 e.	48-	Energy Production and Conservation. No mention of geothermal resources. The majority of the Forest is classified as prospectively valuable hy the USGS (1976).
page 4-57	38-	Contains the following statement: "Based on minimal mining activity...supply of minerals locally or regionally would mt be substantially affected by actions proposed in the alternative."

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This statement is only true for present supply and does not consider underdiscovered or subeconomic resources. This statement is also unsupported by facts or analysis given in the document. A major of the

38- ati / l t removal of lands from bil to n :r explora fc or development or severe operating restrictions. It is recommended that mineral resources be included as an issue so that the SIS may fully address the impacts of surface protection/ development to mineral resource exploration and development. A map showing the pmposed withdrawals overlaid on a geologic map containing mines, prospects, mineral occurrences and known trends would be a useful tool for such an analysis. This information is usually considered to be too detailed for a general land use plan; therefore, it is recommended that the plan merely show a map depicting the pmposed withdrawals (overlaid on mineral potential) and include a statement that the implementation of a withdrawal will depend upon a site specific environmental assessment and mineral report to evaluate impacts to mineral resources.

Environmental Consequences

This section evaluates the impacts to mineral resources in terms of acres to be withdrawn from mineral entry under each alternative. No infomation on the location of the withdrawals is provided; no mineral resource data or analysis is present in the document. Without this information, the reader ts unable to relate the action to its impacts on-the-ground. A map, depicting proposed withdrawals and mineral potential areas, would correct this deficiency. me method used to determine the mineral potential of an area should be presented in an appendix.

It should also be noted that a site specific land report and mineral report is required, in most cases, before a locatable or leasable mineral withdrawal will be considered by the Secretary of the Interior (Federal Land Policy and Management Act of 1976, Sec. 204(c)(2)(12); 90 STAT 2752).

Page 4-57

51- Using table 4.24 the range of alternatives proposing mineral withdrawals in areas of very high, high and medium mineral potential aggregating varies from 19% to 22% of the Sequoia National Forest. mis is an increase of 4% to 9% over the base year 1982. Roughly 1/5 of the Sequoia National Forest is, or is proposed, to be withdrawn from mineral entry. It is recommended that alternatives be considered which reduce the amount

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of withdrawn lands, or, that a rationale is provided as to why this option was not considered. In addition, the increase in the acreage withdrawn should be included on page 16, as a key environmental consequence.

Page 4-57 52- Last Paragraph. Finn decisions at thfs point on blanket administrative withdrawals from mineral entry are premature. Stated purpose is to protect capital investments within recreation site (primarily ski areas). Even low temperature geothermal resources arr ideal for space heating buildings, de-icing mads and Parking facilities and similar applications which serve recreation purposes.

Page 4-138 53- Paragraph 6. me purpose of this EIS is to address impacts to and from other resource decisions (since Minerals is mt identified as an issue). Management has the flexibility to limit and prohibit mineral development in any area by limiting access (withdrawal classifications, etc.) when impacts are addressed through the EIS process. To say the irreversible actions are outside the scope of this EIS is incorrect.

Page 5-1 List of Preparers

54- Neither of the mining geologists are credited with input to the "Environmental Consequences" section. Input in limited to descriptive information for the "Affected Environmental" section.

It is recommended that a minerals specialist be a member of the team preparing the plan, since thfs field requires unusual technical expertise, industry and economic familiarity, and application of mining law and mineral policy. This is especially important when mineral resources is an issue.

Maps 55- Recommend that maps should reflect our management designations for that particular resource activity or not delineate ELM land at all. The problem exists where USFS lands are designated for ORV activities and BLM lands around Chimney Peak stand out from all other lands as white in color which could be interpreted as "undesignated." They would then be vulnerable to increased unauthorized ORV activities.

Wilderness Rockhouse Basin CA-010-029

The Draft as addresses the Bureau's wildemess review

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or nonsuitability of this area for wilderness will be forwarded to the Forest Service for consideration along with the official public hearing transcript - held in Bakersfield on January 9, 1986.

MANAGEMENT CONCERNS APPLICABLE TO THE PROPOSED PLAN AND DRAFT E IMPACT STATEMENT

As the preceding comments strongly indicate, many concerns revolve around the issue of minerals and the scope of minerals coverage in both the plan and the OEIS. For example, there is insufficient discussion of the probable effects of renewable resource prescriptions on mineral exploration and development, with the exception of the impacts of wilderness and other types of withdrawals an mineral access. Yet Forest Service planning regulations, 36 CFR Subpart 219.22(f) calls for the forest planners to determine the probable effect of renewable resource prescriptions and management direction on mineral resources and activities, including exploration and development.

One change in the Plan and EIS would go a long way in presenting a clearer picture of the role of minerals in overall Forest Service planning. and would do much to alleviate the impression of a negative, reactionary approach to dealing with minerals. _That change is the inclusion of a detailed minerals policy statement under 'forest Goals" in the Plan, and wider "Direction Common to all Alternatives" in the OEIS. The Pacific SW Region of the Forest Service is currently working on such a policy which will resemble the minerals policy of the BLM. Whether the policy is officially complete or not. the W.O. and R.O. of the R.S. do have bmad objectives with respect to mineral policy which can be stated or paraphased in these docunents. If the Forest Service is not prepared to make a specific or general minerals policy statement, then the minerals policy of the BLM (attached), which currently has minerals responsibilities on the Forest, should be used. This is critical if the public and future managers seeking direction from this plan are to know what the planning objectives are.

Such planning objectives are clearly laid out for virtually all major forest resources except minerals, Chapter 1, Section 8 of the Plan. This is the Vision Statement, which spells out the goals of the Forest with respect to 11 bmad objectives having public benefit. The need to include mineral Objectives in the Vision Statement is all the more critical as a result of the anticipated shift of full mineral responsibility and authority from BLM to the forest Service mder the interchange.

To summarize, specific recommended changes are:

PLAN

43- 1. Under forest Goals, page 4-4, Mineral and Geology, the one sentence statement should be replaced with a complete Forest Service or BLM minerals policy statement, making this section comparable in scope to the detailed goals outlined for other resources.

STANDARD OPERATING PROCEDURES 5-8-8

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Fuelwood

It is the general intent to refrain from disposal of fuelwood. There are small areas where trees may appear to be abundant enough to support limited fuelwood disposal, but limited public access, the declining of native hardwood vegetation types, and the uneconomical management that would result from such an activity, eliminates fuelwood disposal from further consideration.

Hazardous Waste

Management of the planning area will follow all procedures outlined in the Hazardous Materials Management Program Paper which includes all pertinent federal, state, and local laws, regulations, and orders (BLM - Draft 01/16/84). All new mandates will be incorporated as they become final.

Livestock Grazing

A. Encourage livestock industry participation in grazing management by developing cooperative management agreements on leases which meet the criteria of: 1) an operators good stewardship; 2) joint agreement on objectives for the allotment; 3) having the ability to allow flexibility; 4) recognition by the operators that they have no authority to manage or exclude other uses.

B. Land treatment areas and seedings will be rested until seedlings are sufficiently established to resist pull-up from grazing.

C. Livestock watering developments will be constructed for and safe for wildlife use, as identified.

D. Wherever feasible, livestock watering and handling facilities will be located a minimum of 1,200 feet from riparian zones, water sources susceptible to trampling, meadows and sensitive species habitat, in order to minimize impacts to other resources.

E. Removal of vegetation and surface disturbances will be minimized when developing rangeland improvements, and surface rehabilitation measures will be applied.

F. Water sources that are susceptible to livestock trampling will be protected.

Minerals Reference to comments on DEIS p 2-36

Management of mineral resources on public land open to mineral entry, leasing, and disposal (mineral material sales) will be conducted in keeping with the Bureau's Mineral Resources Policy (Appendix 1).

The criteria outlined below governs the management of the mineral resources on public land within the planning area. These criteria are broken out for each mineral resource operant (i.e., exploration, pre, and post-lease/plan approval/permit) for each group of mineral disposal types (i.e., oil and gas, locatable, and other leasable and salable minerals) as addressed in the alternatives.

2-25

Encl 1-1

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General

The National Environmental Policy Act places a requirement on each management decision regarding mineral development or disposal, to address each impact at that decision level using the criteria developed through Title 40 CFR guidelines. In addition, other federal, state, and local laws, regulations, and orders govern our responsibilities for decision making on mineral related actions as well as placing a responsibility on the mineral operators to comply with these laws, regulations, and orders.

A. Oil and Gas

1. Exploration. Exploration activities are authorized under the Mineral Leasing Act of 1920 (MLA; 41 Stat. 437) and the regulations at 43 CFR 3040. Oil and gas exploration activities are allowed on federal surface managed by the Bureau after notification on an approved form by the operator. The Bureau does not permit or approve operations, but will assure that operations are conducted to avoid or minimize adverse impacts to other resource values.

2. Pre-lease. The issuance of an oil and gas lease is authorized under the MLA. Guidance and requirements are outlined in the regulations at 43 CFR 3100. All oil and gas lease offers will be evaluated for impacts that may be caused from issuance of the lease and the attendant development and production activities associated with the lease, prior to issuance. Stipulations to ensure orderly and sound development of the mineral resource and reclamation practices will be made a condition of approval of an oil and gas lease.

3. Post-Lease. All post lease construction and production activities are authorized under the MLA, the regulations at 43 CFR 3100, and the terms and conditions of the lease. Each discrete activity is submitted on an approved form for approval by the Bureau. At the time of application or notice, each discrete activity will be analyzed for its impact on other resource values as a requirement of NEPA. In addition to the terms and conditions placed on post-lease activities as a condition of approval, all activities must be conducted in compliance with Part 3100 of the regulations and the attendant oil and gas orders and notice to lessees (NTLs).

B. Locatable Minerals

All actions (exploration, location, development, and patenting) regarding the locatable mineral resources on the public land are authorized under the General Mining Law of 1872 (GML; 17 Stat 91). Other laws allow for exploration, location, development, and patenting within areas of special designations or ownership, such as: land patented under the Stockraising Homestead Act, 39 Stat. 364; development of locatable and leasable minerals of the same tract, PL 585 (68 Stat 708); location of uranium claims on land classified or known to be valuable for coal, 69 Stat. 679; location and patent of non-mineral land associated with a placer mining claim, 74 Stat 7; and location and development of locatable minerals in land withdrawn for powersite purposes, PL 359 (69 Stat 681). In addition, the regulations at 43 CFR 3700 and 3800 govern the operation of activities.

End 1-2

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Exploration, development, and production activities conducted an mining claims will be evaluated for known or inferred impacts to other resource values in order to determine whether they rill cause undue or unnecessary degradation to the public land (43 CFR 3809). Activities conducted under a notice (3809) will be evaluated to determine if completed activities are in compliance with tho required reclamation standards as defined in the regulations. Activities canducted under a plan of operations (3809/3802) will be analyzed by the environmental process prior to approval to determine if tho activities as proposed will cause undue ar unnecessary degradation to tho public land. snd the reclamation as proposed follows standard practicer to ensure complete rehabilitation of the disturbed area to a condition as near as practical to what existed prior ta approved activities.

Far activities on mining claims in which mineral activities will substantially impact other resource values worthy of protection, far mining claim locations in areas of high public interest far other resource values, or in areas where minerals not subject to location are being extracted and removed under the premise of the GML, a determination as to the right of the mineral claimant to locate his claim based an a discovery of a valuable mineral deposit will be investigated.

Mining claims will be investigated in order to determine the validity of the discovery of a valuable mineral deposit an application for mineral patent.

c. Other Leasable and Saleable Minerals

1. Exploration far solid leasable minerals is authorized pursuant to tho MLA and by the regulations at 43 CFR 3500: for geothermal resources pursuant to the Geothermal Steam Act of 1970 (GSA; 84 Stat. 1566) and the regulations at 43 CFR 3200; and mineral material disposals (sales) pursuant to the Materials Act of 1947 (MSA; 61 Stat 681) and the regulations at 43 CFR 3600. All activities under this section require approved permits prior to conduct of exploration operations. These permits will be reviewed through the environmental process to determine impacts from exploration activities and develop stipulations to approval of the permit to ensure that there will be no or minimal adverse impacts to other resource values.

2. Pre-leasing. Leasing of geothermal resources is authorized under the GSA and Part 3200 of the regulations; issuance of preference right leases and competitive mineral (solid) leases is authorized under the MLA and Part 3500; and disposal of mineral materials by sales contract or free use permit (FUP) is authorized under the MSA and Part 3600 of the regulations. Prior to approval of any lease or permit in the planning area. an environmental analysis of the proposed lease ar permit Issuance will be made in order to determine the impacts to other resource values.

Areas of special resource values or high public interest for other resource values may be determined unsuitable far leasing or permitting. These areas will be assessed for their impacts to the mineral resource, and alternatives to no leasing will bo addressed in the environmental analysis of lease or permit issuance. Stipulations on post-lease

2–27

End 1-3

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activities and/or standards of reclamation will be made a condition for approval of the lease or permit.

3. Post-Lease. All post-lease construction, mining, development, and/or production activities are authorized under the MLA, the regulations at 43 CFR 23, 3200 or 3500, the terms and conditions of the lease, and/or Geothermal Resource Orders. At the development stage for mineral material activities, authorization is pursuant to the terms of the contract or Permit. All leasable mineral (geothermal and solid) development requires an approved plan of development. Prior to approval of the plan, each discrete activity proposed will be analyzed for its impact on other resource values as a requirement of NEPA. In addition to the terms and conditions placed on post-lease activities as a condition of approval, all activities must be conducted in compliance with Part 23, 3200, or 3500 of the regulations and attendant Notices and Orders.

Oil and Gas Leases - Extraneous Roads

All oil and gas leases on public land within the planning area will be managed to eliminate extraneous roads, wherever feasible, following review of necessity by leasehold operators.

Noxious Weeds

Plants designated as noxious weeds will be managed according to the Federal Noxious Weed Act of 1974.

The California Department of Food and Agriculture is responsible for the designation and eradication of noxious weeds for the state. Procedures developed by the California Department of Food and Agriculture and the Bureau of Land Management are listed in the Memorandum of Understanding between the two agencies.

Paleontology

A. Paleontological resources will be preserved and protected in accordance with 36 CFR 2, Section 2.1 (iii), 36 CFR 2, Section 2.5 (a) and (b) and 43 CFR 8000.0-6 (c)(2).

B. Paleontological resources are protected under the Antiquities Act of 1906 and collecting, in general, has been identified as a resource use within the planning area; however, no information on significant sites has been collected. Therefore, all "type" locations and significant vertebrate fossil sites will be managed for protection when identified.

Realty

A. Consistency with County General Plans and zoning will be maintained with Department regulations and Bureau policy for all realty actions.

B. Federal, state, county, and local agencies desiring access to their land across public land will be encouraged to sign a cooperative agreement with BLM for management of the access, rather than applying for a right-of-way.

End 1-4

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BUREAU OF LAND MANAGEMENT
MINERAL RESOURCES POLICY

This statement sets forth BLM policy for management of mineral and energy resources on public lands. It reflects the provisions of three important acts of Congress. the Mining and Minerals Policy Act of 1970, the Federal Land Policy and Management Act (FLPMA) of 1976, and the National Materials and Minerals Policy, Research and Development Act of 1980. This policy statement represents a commitment by BLM to implement th [illegible] consistent [illegible] BLM's [illegible]

[illegible] and Minerals Policy Act of 1970 declares that it is the continuing policy of the Federal Government [illegible] and encourage [illegible] the development of a stable domestic minerals industry and [illegible] economic [illegible] of [illegible] resources.

The Federal Land Policy and Management [illegible] reiterates that the 1970 Mining and Minerals Policy Act be implemented and directs that public [illegible] be [illegible] managed in a manner which recognizes the Nation's need for domestic sources of minerals and other resources. FLPMA also provides for improved inventory, planning, and decision processes.

The 1980 National Materials and Minerals Policy, Research and Development Act restates the need [illegible] 1970 [illegible] requires the Secretary of the Interior to improve the quality of minerals data [illegible] and use [illegible] 1982, the President delivered to Congress the first annual [illegible] required by [illegible] act. [illegible] provided [illegible] guidance to implement these acts.

The BLM recognizes a public [illegible] and energy [illegible] some of which are critical and strategic. BLM is responsible for making public lands available for orderly and efficient development of [illegible] of balanced multiple management

The following principles will guide BLM in managing mineral resources on public lands.

1. Except for Congressional withdrawals, public lands shall remain open and available for mineral exploration and development unless withdrawal or other administrative action is clearly justified in the national interest.
2. BLM [illegible] of public land mineral resources in a manner [illegible] economically and [illegible] and [illegible] resources.
3. BLM will process mineral patent applications, permits, operating plans, [illegible] exchanges, leases, and other use authorizations for public lands in a timely and efficient manner
4. BLM's land use plans and multiple-use management decisions will recognize that mineral exploration and development can occur concurrently or sequentially with other resource uses The Bureau further recognizes that land use planning is a dynamic process and decisions will be updated [illegible] data are evaluated.
5. Land use plans will [illegible] geology and energy and mineral value on public lands through more effective geology and energy and mineral resource data assessment.
6. BLM will monitor salable and leasable mineral operations to ensure proper resource recovery and evaluation, production verification, diligence and inspection and enforcement of the lease, sale or permit terms. BLM will ensure receipt of fair market value for [illegible] by statute
7. The Bureau will maintain effective professional, technical, and managerial personnel knowledgeable in mineral exploration and development.

[illegible] will be [illegible] diately and further clarified where necessary through specific guidance to the field.

Robert F Burford

Director, Bureau of Land Management

Date: MAY 29 1984

Encl 2-1

5-8-86
I708

43- 2. The one sentence statsnent presently included under Forest Goals (referred to above, should be placed in Chapter 1, page 1, under "8. Vision Statement" as one of the bulletized intentions of the Plan.

DEIS

43- 1. The complete Forest Service or BLM minerals policy statement, as [illegible] above, st[illegible] be [illegible] in [illegible] 2, [illegible] page 2-23, [illegible] Common to All [illegible]

38- 2. Under each separate alternative, Management Prescriptions need to address the affect of that alternative on mineral resource exploration and development (i.e., opportunities, exclusions, restrictions).

We appreciate the opportunity to comment on these docunents.

Sincerely,

Ed Hastey
State Director

Enclosures:
Encl. 1 - Standard Operating Procedures
Encl. 2 - BLM minerals Policy

cc:
DSO, Mineral Resources
CH, Bakersfield

U.S. Department of Interior (BLM)

Resolution:

1. Neither the public nor the Forest Service identified minerals as important enough to qualify for either a public issue or a management concern. The Sequoia Forest is not a highly mineralized area, it has been heavily prospected in years past and is currently under scrutiny by many prospectors. There is only one operating mine on the Forest and it employs only one person. For over a million acres of land, this speaks volumes on the importance of minerals on this Forest.

   Within the planning period, prospecting will continue; however, few, if any, mines are expected to materialize. If, for some presently unknown reason, the minerals picture reverses itself, changes to the Plan can be recommended.

2. There is a great difference between proposal and actualities. Page 2-9 says no actuality is anticipated, page 3-14 says several proposals have been made. There is no conflict in these two statements. Also, the Monache proposal has (since the DEIS) been turned down.

3. Restrictions on stream and wetland protection will not eliminate or even severely restrict mineral exploration. Very few mining operations on the Sequoia are in or near streams or wetlands.

4. While miners have an interest in the Forest, they are not considered a separate social group. Most miners would be considered part of the "Working Family" group.

5. Thank you for pointing out this omission. A reference to the Kawaiisu has been added.

6. This section has been corrected to reflect your comment by dropping the last sentence.

7. The test has been corrected to clarify the discussion.

8. The correction has been made -- Thank you for pointing out this error.

9. This typing error has been corrected.

10. We currently have only one operating mine on the Forest and it has not yet been through a validity hearing.

11. To date, prospectors, and the miner, have been willing to do those things that reasonably mitigate potential damage to the environment that would occur through their operations. This is not a large enough issue to fully deserve an examination. On the ground, the present low-profile system is working.

12. Such an assessment is not needed for this planning period.

13. We have corrected the reference to the PCT on this page.

14. Analyzing potential impacts to a very small program is not cost-effective and has not been identified as an issue or a management concern.

15. Reserves are normally expressed in tonnages and there are very, very few mineralized areas that have large reserves. The acreages cited reflect only the broadest type of geologic data. Scrutiny by prospectors and development of mines is by far a better measure of mineral value.

16. The OHV Management Direction for the Sequoia NF has been modified considerably from the Draft Plan. The final direction does not include any limited (open) areas where OHV travel of designated routes is permitted.

Specifically relating to mining activities, incidental access of designated routes can be permitted (see item b under Zone B under the revised write-up in the Plan, Chapter 4). Those involved in varying phases of mineral prospecting, exploration or development would be included under this heading. The reference to "...over 40 percent slope, or with vegetation which generally precludes travel..." was meant to give readers an understanding that much of the NF is not conducive to OHV travel -- most folks couldn't or wouldn't be able to ride in these areas. Again, mineral related activities will be covered under operating plans and therein are different than the rules which apply to general recreationists.

17. Since no recommendation for W&SR is proposed, management involvement by the F.S. on river segments outside the NF boundary is not envisioned. If, per chance, a change in our recommendation occurs, and this segment of the river is included in W&SR legislation and is so designated, F.S. involvement in planning will be necessary. In this case, coordination with the Caliente Resource Area would be appropriate.

18. In our judgement, the program is not large enough or of general public concern to warrant this level of detail in the Plan. NEPA requirements will result in appropriate levels of public involvement.

19. Conflicts between legal planned and legal un-planned activities are resolved through vegetation, mitigation and possible revision. There have been no unresolvable conflicts to date.

20. As to a Minerals Policy, this item is being formulated at the Regional Level and would be incorporated into this Plan.

21. Order 3 Geologic Resource Inventory has been added to the glossary. The purpose of this inventory is to describe regional geologic factors and designation of these factors as well as geologic resources. It would also address how these affect land allocations, general facility locations and management alternatives. Additional information is available in Exhibit 1 of FSM 2881.

22. Geothermal resources are considered to be of minor importance on the Sequoia NF at this time. Little interest has been shown in this area and there has been no development for heating or power.

23. It should be noted that the area withdrawn from mineral entry in base year 1982 consists of 98 percent wilderness and 2 percent other. Wilderness is created by Congress and would only be deleted by Congress. The 2 percent that is not in wilderness is not a significant management concern. On a case-by-case basis, it could be important for one project, but for planning purposes, probably not.

24. The withdrawals are not "blanket" withdrawals because they address very specific areas. In addition, the withdrawal process includes an environmental assessment. Preclusion of use of geothermal or other mineral resources would, by necessity, be carefully weighed.

25. We maintain that such (irreversible) actions are outside the scope of this EIS. The decision to mine is not in our control; it is generated by outside interests and our ability to limit access is very limited. It is also not something that can be accomplished in a short time, nor is it something we should do. Our aim would be to encourage the extraction of valuable minerals and insure that environmental concerns are addressed and mitigated as needed.

26. Our minerals specialists were consulted constantly in the preparation of the Plan.

27. A good point has been raised. In order not to create a wrong impression with readers, maps have been modified to include a tone so as BLM lands do not show as totally white in color.

2708

United States Department of the Interior

FISH AND WILDLIFE SERVICE
SACRAMENTO ENDANGERED SPECIES OFFICE
2800 Cottage Way, Room E-1823
Sacramento, California 95825

April 25, 1986

Mr. James A Crates
Forest Supervisor
Sequofa National Forest
9110 West Grand Avenue
Porterville, California 93721

Subject: Proposed Land and Resource Management Plan and Craft Environmental Impact Statement for the Sequofa National Forest (#1-1-86-I-74)

Dear Mr. Crates:

This letter contains our comments on selected aspects of the Sequoia Forest Plan relatfng to threatened and endangered species. Cur comments are restricted to those elements of the plan that have the greatest potential to conflict with the survival of candidate. proposed, or listed species. We do not have sufffcient staff resources to critically review other elements in the plan to determine if they are consistent with your assumptions and projections for threatened and endangered species. Other divisions of our agency may submit comments separately concerning other fish and wildlife issues.

1 Generally, we believe that the resolution of issues involving listed species is best achieved through the normal Section 7 consultation process on a project-by-project basis when more specific information is avaflable concerning potential project fmpacts. Therefore, we recommend that you initiate formal consultation on those components of the selected alternative that may affect listed species at the time such projects appear on your planning horizon.

The listed species that occur on the Sequoia Forest include the Little Kern golden trout (Salmo aquabonita whitei), American peregrine falcon (Falco peregrinus anatum), bald eagle (Haliaeetus leucocephalus), and California condor (Gymnogyps californianus). Of these, only the Little Kern golden trout is restricted in distribution to the Sequoia National Forest. The management direction for the preferred alternative states that the Little Kern Golden Trout Management Plan will continue to be implemented; that two pairs of falcons will be established on the Forest; and that habitat will te maintained cn the Forest at least one pair or' condors.

2 With respect to the California candor. the proposed plan makes a commitment to protect only 2,000 acres and one nest site. This falls short of what would be required to fully implement recovery goals of the California Condor Recovery Plan (1984). The Starvation Grove Nest Site Management Plan alone appears to contain about 2,000 acres of habitat.

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Thus. the stated acreage output will not provide habitat to meet management goals for nestfng and roosting sftes recmended in the California Condor Recovery Plan (USFWS 1984) and Forest Service Habitat Management Plan for the California Condor (Carrier 1971). These documents call for protection of nestfng and roosting sftes. There fs one additional nesting site of record and numerous roosting sftes for the Sequofa. The Recovery Plan specifically recommends preservation actions for the Basket Peak and Breckenridge Mountain roosts. The proposed plan does not reflect protection of these areas. In addition, we have worked With your staff in the past to set asfde acreage to. protect the Lion Ridge roost area (see informal consultation #1-1-83-I-184). Thus, we advfse that the goals be revised to include an estimate of additional acreage needfng management as condor habf tat, and that the preferred alternative fnclude protection of condor nestfng and roosting sites.

2

In addition to listed species. several candidate plant and animal specfes occur on the Sequoia Forest. Included among these candidates is the Shirley Meadow mariposa (Calochortus coemleos var. westonff). This plant is the subject of a conservation agreement and management guide developed fn 1984. Candfdate species assigned to Category I are taxa for which the Fish and Wildlife Service has substantfal information on hand to support listing. We antfcfpate the eventual development and publication of a proposed rule to list such species as threatened or endangered. The level of threats facfng taxa fn Category 1 determines the priority order for listing package development. Candidate species assigned to Category 2 are taxa for which the Fish and Wildlife Service has some information to indicate that listing may be appropriate. However. substantial additional biological data will be required to support a listfng proposal. and ftis likely that some taxa fn Category 2 will not warrant lfstfng. Candidate species are not afforded legal protection under the Endangered Specfes Act.

The candidate plants on the Sequoia National Forest fnclude:

Common Name	kientific Name	Category
Shirley Meadow marfposa	Calochortus ccemleos var. westonii	I
Piute navarretia	Navarretia sectiloca	1
Kernville poppy	Gchscholzia crccera	2
Springville clarkia	Clarkia sarinovillensis	2
Kern River daisy	Erigeron multiceos	2
Piute buckwheat	Eriogonum breedlovei var. breedlovei	2
Twisselman buckwheat	Eriogonum twisselmannii	2
Greenhorn adobe lily	Fritillaria striata	2
Bald Mountain potentilla	Horkelia tularensis	2
Shevock's monkeyflower	Mimulus shevockii so. nov. ined.	2
Twisselmans nemacladus	Nemacladus twisselmannii	2
Nine Mile Canyon phacslfa	Phacelia novemmilensis	2
Piute jewelflower	Streptanthus cordatus var. piutensis	2

The management di: for the preferred t states that sensitive plants v be treated as if they a fied as

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threa d or . We are avaflable to provide c
is if you follow this nan :ion and t infor
su in pi that ay affect these : lida t

The candidate animal species that occur on the Sequoia Forest include *the* Kern River rainbow trout (Salmo aairdneri gilberti), Kern Canyon
3 slender salamander (Batrochoceps simatus), Tenachipi slender salamander (Batrochoceps stebbinsi), California wolverine (Gulo gulo luteus), and Sierra Nevada fox (Vulpes vulpes necator). All of these canaiaate animals are assigned to Category 2

The wolverine and Sierra Nevada fox were widely distributed in the Sierra Nevada historically. Because only sketchy infoimatian is available concerning their arrent distribution, we have no specific recommendations on haw habitats in the Forest should be managed for *these two* species. The Tehachapi slender salamander is known from *the* vicinity of Paris Lorraine and the Caliente Creek drafnage south of the Sequoia Forest. However, populations could also occur in those areas of the Forest that encompass the Piute Mountains. A significant portion of the geographic range of the Kern Canyon slender salamander is within the Sequoia National Forest. This species has been exclusively found distributed on north-facfng canyon wall slopes in Kern Canyon and tributary drainages ahove the Kern River flood line, from about 1500 to possibly 3000 feet in elevation. *The* small size and apparently disjunct distribution of known colony sites makes them extremely vulnerable to extirpation *frcm* single catastrophic events. Management planning for this area should emphasize protection and mafntenance of the extant salamander habf tats.

The Kern River rainbow trout was thought to be extinct until recent electrophoretic studies by Dr. Graham Gall of the University of California, Davis. confirmed that a genetically distinct trout still exists in the historic range of S. g. gilberti. Its current distribution includes a sh& reach of the upper Kern River and a small number of its tributaries in the Sequoia Forest. It is not known how many populations still exist or how large these populations are. How this fish has maintained its genetic integrity in the face of repeated hatchery trout introduc is not known There are no known physical barriers to isolate the stem populati from ntrodu monids. Potential threats to this fish include: (1) lagging and the road building associated with timber harvest activities. (2) mall hydroelectric development, (3) mfneral development. *(4)* unauthorized transplants of nonnative fishes, (5) habitat modifications that would break down existing isolating mechanisms, (6) excessive angling harvest, and (7) acid precipitation.

The proposed plan contains no specific management prescriotions for
4 protecting the Kern River rainbow trout. Any protection that is afforded thfs species would be coincidental with other management prescriptions, such as wilderness designation or riparian habitat managment. *The* proposed plan spcifically notes that "Other than continued implementation of the Little Kern Golden Trout Management Plan, no *other* direct fisheries habitat improvement is planned."

In view of the d inc: that are pr In the plan for
ivities tl have t pota to iflict wfth fishery
agement : as nu, re fi vehfcle traffic.
livestock grazing. and mineral development, we questfon haw fish-cabitat conditfons fn "most streams will be maintained in thefr current condition." Just to maintain habftat conditfans will require increasing levels of monitoring and management to counter these potential threats.- We see no evidence fn the proposed plan to insure that such monitoring and management will be forthcoming. The Sequoia National Forest currently does not have a professional fishery biologist an its staff to
5 evaluate and monitor the impacts of conflicting actfvftfes on fish habftat conditions. The position formerly held by Richard Standage has been vacant for over one year. and there is no indication in the plan that thfs posftfan will ever be filled. Without such fishery expertfse. we believe that the fishery problems associated with conflicting land uses may not be recognized. let alone corrected. Similarly, unless such technical expertise is avaflable, we questfon how the Forest will be able monitor habitat condftfons. even to the limited extent specified in Chapter 5 of the proposed plan. We also questfon bow adequats monitoring can be performed to ascertain that all populations of ffsh and wildife an the Forest are maintained at viable levels for only $6,000 annually.

Even if the Forest does commit the resources needed to maintain habitat condftfons for the Kem Rfver ranibow trcut in thefr arrent state. there is no assurance that thfs ffsh wfll survive. Only 31.5: of tha stream habitat occupied by fish in the Sequoia National Forest fs rated as good or better (Standage 1983). Most of the habitat occupied by Kem River rainbow trout in the smaller tributaries is fn poor condition (Standage 1983). The rwafnfng habftat fn the mainstem of the Kem Rfver is not isolated by physical barriers and thfs populatfon may be dftplaced ff other trout species become establfshed fn this reach of rfver. Few data are avaflable concernfng the total population sire and distribution of thfs fish and virtually no information is available concerning populatfon trends. Surveys are needed to document baseline conditfons and to evaluate the vulnerability of thfs ffsh to be land use changes proposed in the plan.

The system proposed in the plan far monitoring the status of fish and
6 wildife utilizes a habftat capability model. Yet the existence of avallable physfcal habftat provides no assurance that a species will be able to use ft. The principal factor in the decline of the Little Kern golden trout to threatened status was introgressive hybridization with an introduced species. The Kem Rfver rafnhw trout fs vulnerable to thfs same threat. Several of the activitfes that would be authorized in the proposed plan would increase the likelihood of unauthorized fish transplants by improving human access fnto the uoper Kern River basin. A monitoring program that relies solely on habitat capability rould not detect such a threat. Given the long reporting interval specified in the plan relative to such monitoring, f t fs possible that the Kem Rfver rainbow trout could be displaced by an unauthorized ffsh transplant before the problem fs even detected and reported.

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In view of the foregoing discussion, we belfeve the proposed plan fs deffcfent fn the manner It treats candfdate animal species. Wfth respect to the Kem Rfver rainbow trout, we recommend that the plan address the potential problems associated with thfs ffsh by (I) conducting baseline surveys to document the size of the population and its distribution on the Forest, (2) assessing arrent habitat condftfons and the management actions needed to maintain the genetic integrity of this ffsh, (3) assessing the threats that would he posed by conflicting activities, (4) makfng a commitment to maintain adequate professional fishery support staff to respond to conflicts that may adversely affect fish populations. and (5) modifying and expanding the proposed monitoring system.

4 Problems similar to those described above for the Kem Rfver rainbow trout also exist with respect to the two distinct 'golden' trouts that are native to the South Fork Kern River drainage. We suggest that an approach sfmilar to that recommended above for the Kern River rainbow trout also be taken for these two ffshes.

'Thank you for the opportunity ta review the subject documents. We would appreciate receiving notfce cf future actfvfties that relate to the revision and implementation of the proposed plan. Please contact Dave Harlow or Ed Lorentzen at FTS 460-4866 (916/978-4866) ff you have any questions.

Sincerely,

David L. Harlow

for Gail C. Kobetich
Project Leader

cc:
Chief, Endangered Species, Portland, OR (AFA-SE; Attn: Ralph Swanson)
Pacific-Southwest Regional Office, U.S. Forest Service, 630 Sansome Street, San Francfsco, CA 94111 (Attn: Gale Avant)
Field Supervisor, Ecological Services, Sacramento, CA (ES-S)

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REFERENCES

Carrier, W. D. 3371. Habitat management plan far *the* California condor. U.S. Forest Service. 51 pp.

Standage. R W. 1983. Analysis of *the* Management Situation: Sequoia National *Forest* Fisheries. Tule River Ranger District, U.S. Fares: Service, 56 pp.

U.S. Fish and Wildlife Service. 1984. California condor recovery plan. Portland. OR. 110 pp + appendices.

U.S. Department of Interior (Fish and Wildlife Service)

1. Normal consultation on a project-by-project basis will continue and remain the Forest's main link to the Fish and Wildlife Service regarding threatened, rare, or endangered species.

2. The Plan has been revised to follow the California Condor Recovery Plan.

3. We agree that surveys are needed. The Kern River rainbow is not currently listed in a protected status and not enough information is available at this time to determine the need for protection. As this information is gathered, the Forest will develop management direction and guidelines as needed.

4. Our current and proposed management of resources in and around fish habitat is to emphasize riparian-dependent resources over non-dependent resource activities such as timber harvesting. Our use of Best Management Practices and prescriptions, developed through our Forest Riparian Standards and Guidelines, will maintain fisheries habitat. Improvement of fishery habitat will occur through erosion control projects, removal of fish barriers, planting of willows and other plants to stabilize banks and provide shade, and installing structures such as boulder clusters to increase the number and size of pools. All these improvement measures are currently, and will continue to be, implemented as opportunities are identified.

5. The Forest has taken positive steps toward obtaining fisheries expertise. A Fisheries Biologist now works on the Sequoia and Sierra National Forests to provide technical expertise. She is assisted by many field personnel, such as wildlife biologists, range conservationists, and timber planners, in basic inventory monitoring of fish habitat resources and identification of problem areas needing restoration project work.

   Through implementation of Best Management Practices (BMP's) and the Forest Riparian Standards and Guidelines, the Forest will maintain current fish habitat resources.

6. Fish habitat monitoring is a component of overall monitoring of streamside management zones and riparian management as addressed in the monitoring section of the Plan. Monitoring of habitat capability will be related to fish population studies.

   Introduced species management is the responsibility of the State.

8060

1 MAY 1986

Mr. James A. Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Dear Mr. Crates:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled SEQUOIA NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN: TULARE, KERN AND FRESNO COUNTIES, CALIFORNIA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because we are concerned about potential impacts to forest resources such as watersheds, water quality, riparian and meadow areas, beneficial uses and soils. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

Ne appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Roberta Blank, Federal Activities Branch, at (415) 974-8187 or FTS 454-8187.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (4 pages)

Surface Water Resource

1. On page 3-38, the DEIS States that "Water quality is protected by applying Best Management Practices (BMPs) in accordance with a cooperative agreement with the California State Water Resources Control Board." The 1981 Management Agency Agreement between the State Water Resources Control Board and the Forest Service certified that BMPs developed in the §208 Plan would constitute sound water quality management and that implementation of these practices would constitute compliance with substantive and procedural requirements of state water pollution control law as mandated by 5313 of P. L. 95-217. It should be noted, however, that implementation of BMPs does not constitute compliance with Water quality standards per se. In the event that a Sequoia National Forest project, undertaken with or without appropriate BMPs, creates a water quality problem or causes a standards violation, the state and Regional Water Quality Control Boards retain the authority to carry out their responsibilities for management of environmental quality. In addition, the DEIS indicates on page 3-31 that 'Currently, the Sequoia National Forest does not have a water quality monitoring program." Water quality monitoring would be important to assess compliance with water quality standards and the success of BMPs.

2. The FEIS should address compliance with the California Antidegradation Policy. This policy states "where the existing quality of the water is better than the Standards set, that such existing high quality will be maintained until it has been demonstrated to the State that anv change will be consistent with maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial uses of such water and will not result in water quality less than that prescribed in the policies." This policy is reiterated in Federal regulations (40 CFR 131.13(a.2)). The FEIS should evaluate the projected degradation of water quality due to cumulative watershed impacts from timber harvesting, reforestation ground preparation, prescribed burning, mechanical vegetative treatment, ski area development and new road construction. in terms of the Antidegradation Policy.

3. The discussion of cumulative watershed impacts on pages 4-30 to 4-35 indicates that for alternatives PRF, CUR, CED, MKT, PRO and WLI, "the potential cumulative watershed impact index remains below 300 until the fourth and fifth decade when it nearly doubles at which time increased mitigation will be needed." The FEIS should address the relationship between the watershed index and water quality degradation, in terms of impacts to beneficial uses and discuss what additional mitigation measures would be required and how successful these would be.

Standards and Guidelines

1. With regard to dispersed recreation management, we encourage efforts to prevent damage to sensitive meadow areas from recreation use. Also of concern is the potential for Giardia infestations in backcountry streams that receive dispersed recreation Use. The FEIS should discuss known or suspected Giardia problems. If there is monltorlng or a plan of action for this problem, it should be included in the Final Forest Plan.

2. The Standards and Guidelines €or riparian and meadow areas are inadequate. However, the discussion indicates (Plan, p. 4-27) that in the future a Riparian Area Management Plan, including Standards and guidelines, will be composed. EPA suggests that interim forestwide riparian standards and guidelines that offer increased protection for sensitive riparian areas be applied until specific quidelines are established by the management plan. The FEIS should address when the Riparian Area Management Plan will be completed and discuss whether funds have been budgeted for such a plan. The management plan should include wet meadow areas.

3. The Standards and Guidelines for Soil and Water do not specifically address the use of herbicides. The FEIS should present guidelines used to protect surface and ground water from herbicide runoff and drift. Provisions to monitor these constituents in municipal watersheds should be included in this discussion.

Vegetative Competition

1. The FEIS should discuss the relationship between the method of timber harvesting used (i.e., even age management) and the need for herbicide use to achieve regeneration.

   Is it possible, in this southernmost extent of the Sierra Nevada, that clearcut or seed tree harvest regimes change the microclimate (due to removal of shade and moisture) in cutover areas? Would this make reestablishment of seedlings difficult. while concurrently improvlng the Site for brush species, thereby requiring herbicide use?

2. The FEIS should discuss whether there is a reforestation backlog on the Forest. If so, what is the extent of this backlog and how does it affect modeling assumptions for growth and yield used to predict outputs' Impacts of such a reforestation backlog on sediment levels and water quality should be discussed.

Soils

1. Page 3-36 indicates that quantitative information about soils Properties and forest management practices is scarce and that little is known about the tolerance of forest soils to withstand impacts without seriously impairing productivity. The table on page 3-35 indicates that the Forest has a large proportion of highly erodible soils. Page 2-207 states that under the Preferred Alternative there is only a moderate likelihood of maintaining soil productivity. Page 3-35 states that productivity can best be maintained if the soil surface layer is maintained and there is a continued supply of forest humus. The above statements are of concern because most of the alternatives proposed use primarily clearcut and seed tree methods of harvest, which cause the maximum amount of disturbance to the soil surface. The FEIS should indicate what a moderate likelihood of maintaining soil productivity means with regard to sustained yield, and impacts to other resources such as watershed, water quality, beneficial uses and riparian and meadow areas.

2. ?age 2-211 states that the "quality of the fishing experience will decrease" under the Preferred Alternative. The FEIS should explain this statement. The DEIS also states that trout levels will remain constant throughout the planning period for alternatives where the cumulative watershed impact index nearly doubles in the fourth and fifth decades. The FEIS should discuss the cumulative watershed impact index values with regard to fishery levels.

Yonitorlng and Needs

It appears that additional study is needed in the areas of riparian and soils management to ensure that the Forest can establish output goals that also protect Eorest resources and productivity. We recommend that the Forest make study of these issues a priority, and gather more baseline information on soil tolerance and water quality before proposing increases in outputs. It appears that these factors may influence the assumptions upon which this Forest Plan is based.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential enviromntal impacts requiring substantive changes to the proposal. me review my have disclosed opportunities for application of mitigation measures that could be accomplished with m more than minor changes to the proposal.

EC—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures m y require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to pmvide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the m action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EFA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. P A intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary. but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data. analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. P A believes that the identified additional information, data. analyses. or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

Environmental Protection Agency

Resolution: (Note: The numbers of the topic responses key to those in the incoming letter.)

Surface Water Resource

1. The Forest Service realizes the State's authority to carry out its responsibilities for management of environmental quality. As part of the "Water Quality Management For National Forest System Lands In California," the Forest will be monitoring riparian areas following "Riparian Standards and Guidelines for the Sequoia National Forest" (January 1986).

2. The FEIS indirectly addresses compliance with the California Antidegradation Policy. By implementing Best Management Practices (BMP's), improving watershed conditions with restoration projects, and obliterating unneeded roads, the FEIS projects only water quality increases.

3. The Potential Cumulative Watershed Impact Index is only a barometer for all soil disturbing activities by alternative per decade. It does not project water quality degradation. With BMP's, beneficial uses will not be significantly impacted. Additional mitigation measures will be addressed within the "Water Quality Management For National Forest System Lands In California" process for new BMP's.

Standards and Guidelines

1. To minimize recreation use impacts in meadows and riparian areas, camping within 100 feet of a stream or lake is discouraged. The use of untreated stream or lake water is also discouraged. The Forest Service information services emphasizes both of these areas and recently published "Is The Water Safe?" (a pamphlet on giardia).

2. The Forest composed a document "Riparian Standards and Guidelines for the Sequoia National Forest", January 1986, and is in the process of implementing it. The Forest Plan calls for $30,000 per year for implementation. The riparian area includes meadows.

3. The analysis of pesticide environmental impacts will be fully documented in a separate environmental analysis or an environmental impact statement. Provisions to monitor these water quality constituents in municipal watersheds will be addressed in those documents.

Vegetative Competition

1. Appendix G of the EIS discloses the state-of-the-art knowledge, in condensed form, on timber management and the relationship between the method of timber harvesting used and the need for herbicide use to achieve regeneration.

2. The reforestation backlog identified as a result of NFMA (1976) has been completely eliminated on the Sequoia National Forest.

Soils

1. Our goal in managing the Forest is to maintain the long-term productivity of the Forest's soils and to prevent any significant reduction in water quality. Consequently, we designed each of the alternatives to meet these goals.

2. As stated before. Potential Cumulative Watershed Impact Index is only a barometer for all soil-disturbing activities by alternative on the Forest. It does not project actual soil movement or sediment delivery to streams, much less the impact on fisheries. With BMP's. sedimentation from these activities will have an insignificant effect on fisheries.

Monitoring and Needs

1. The Monitoring Plan identifies two methods for evaluating impacts on earth resources. Soil productivity and water quality will be monitored utilizing cumulative watershed impact analysis. Meadow, riparian area, and associated values will be monitored by validating the application of BMP's through systematic sampling as described in the Forest riparian standards and guidelines.

Resources Building
1416 Ninth Street
95814
(916) 445-5656
TDD (916) 324-0804

California Conservation Corps
Department of Boating and Waterways
Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO CALIFORNIA

Air Resources Board
California Coastal Commission
California Tahoe Conservancy
California Waste Management Board
Colorado River Board
Energy Resources Conservation And Development Commission
San Francisco Bay Conservation and Development Commission
State Coastal Conservancy
State Lands Division
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Boards

Mr. Chuck Pickering
U.S. Forest Service
900 West Grand Avenue
Porterville, CA 93257-2035

April 24, 1986

Pear Mr. Pickering:

The State has reviewed the Sequoia National Forest Plan, submitted through the Office of Planning and Research. Review was coordinated with the Stat4 Lands Commission, Regional Water Board, and Departments of Conservation, Fish and Game, Forestry, Parks and Recreation, Water Resources, Health Services, and Transportation.

Attached are extensive comments received from the Departments of Conservation, Fish and Game, and Transportation.

1- The Department of Parks and Recreation comments that the Forest Plan should identify specific sites that could be recommended for formal designation as Sno-Park sites. If needed, consideration should be given to a financial plan for providing the necessary grading and paving to support the weight of snow removal equipment. Contact for the Department is Ken Martin, Box 942896, Sacramento 94296-0001.

2- The Department of Water Resources (DWR) comments that implementation of alternatives other than the Resources Planning Act or the Low Budget Alternative would result in Increased sedimentation of reservoirs and a consequent reduction in water supply and hydroelectric energy. The cost of replacing such lost water supply and energy would be high, and these potential losses should be considered in the economic analysis.

Firm supplies have a much higher value than intermittent supplies with regard to the reliability of potential water supplies and related power. Although intermittent supplies can be "firmed up" by regulatory storage, the bulk of new runoff expected would occur in wet years when extra capacity on existing reservoirs would be unavailable. DWR, therefore, believes that reduction of runoff variation is desirable.

stions re arding these comments should be directed to Ken Turner at 445-7525.

Sincerely,

Gordon F. Snow, Ph.D
Assistant Secretary for Resources

Attachments (3)
(SCH 85111813)

The Resources Agency of California

- Parks and Recreation

Resolution:

1. The Forest Plan does not include the level of specifics on Sno-Park sites on the Forest requested. We see a long-term need to undertake a planning effort to identify the specifics of winter recreation activities, including both motorized and nonmotorized uses. Therefore, this addition has been made to management direction in chapter 4 of the Plan. This study effort will result in the identification of additional Sno-Park sites. Currently, the Forest has two sites, both located along the Western Divide Highway on the Tule River R.D. This has been noted in the discussion in the Affected Environment section of the FEIS (Chapter 3) and the AMS summary of the Plan (Chapter 3).

- Water Resources

Resolution:

2. The Department of Water Resources (DWR) concern about-sedimentation comes from the Potential Cumulative Watershed Impact Index. This index is only a barometer for all soil disturbing activities by alternative on the Forest. It does not project actual soil movement much less sediment delivery to streams or reservoirs. With Best Management Practices (BMP's) sedimentation from these activities will have an insignificant effect on reservoir capacity.

2491

State of California

ME RESOURCES AGENCY OF CALIFORNIA

Memorandum

To : Dr. Gordon P. Snow
Assistant Secretary for Resources

Date : FEB 21 1986

Subject: Draft EIS and Management Plan for Sequoia National Forest, SCH No. 85111811

From Department of Conservation—Office of the Director

The Department of Conservation's Division of Mines and Geology has reviewed pertinent sections of the subject document regarding mineral resources and has the following comments:

(1) The EIS mentions gold, hmgsten, uranium, rock aggregate and decomposed granite, and geothermal resources as resources present in the Natronal Forest. In addition, Smith and others (1971a, 1971b, 1, 2), reported occurrences of the following mineral commodities in the Forest:

Antimony
Barite
capper
Fluorite
Lead
Limestone
Molybdenum
Silver
zinc

1- We recommend that these be mentioned in the Final EIS to provide a more comprehensive picture of the Forest's mineral resources. The Final EIS should also emphasize that a detailed inventory of mines, minerals, and mineral potential has not been conducted on the Forest; therefore, the present and future importance of the Forest's mineral resources is still largely unknown.

(2) On page 1-3, several issues related ta management of the forest are discussed. Mineral resources are not discussed in this-sect Furthermore. on page 3–70, the OEIS cites the fallowing:

> "... use and production is not a Forest issue or concern because of low mineral potential."

The above quotation seriously contradicts a subsequent statement on page 3-71 that the Forest contains "... 670,000

acres of medium; and 335,000 acres of very high/high potential." These figures were assigned by personnel of the Forest Service. yet evidently have not been given much attention relative to other issues.

2- We recommend that mining and mineral resources be formally included as one of the issues discussed on page 1-3. The emphasis today of mining high-volume, low-grade ore seriously affects other uses of land and is particularly important if management of the Forest during the next 50 years is going to emphasize and encourage mineral development as stated in the Management Plan (p. 4-4).

(3) Each of the management alternatives lists numbers of operating plans to he approved per year over the next 50 years. It is not clear how these numbers were derived and whether they represent plans projected for approval or represent an annual
3- numerical restriction on approvals of plans. We note that the year 1982 (41 plans) was evidently a base for the alternative plans' numbers, but this is not clearly stated in any of the sections of the report that discuss minerals. If this year was used as a base. how representative is it and why weren't years prror to 1982 considered?

(4) On page 3-71, it is concluded that development of geothermal resources is unlikely during the planning period. If this period covers 50 years, Men this conclusion is unwarranted.
4- 'Current information" cannot reliably he used to project potential discoveries, uses, and technological advancements regarding geothermal resources over the next 50 years. Geothermal resources are known to occur in the planning area now.

(5) The Geologic Resource Inventory (p. 2-36) is essential for proper management of the Porest. A definition of "Order 3 standards", which the USFS intends to use as its guideline
1- for the inventory, is needed. A discussion of the components of this inventory is also needed.

If you have questions regarding these comments call Zoe McCrea, Division of Mines and Geology Environmental Review Officer, at (916) 322-3202.

Dennis J. O'Bryant
Dennis J. O'Bryant
Environmental Program Cocrdinator

cc: Zoe McCrea, DMG
Chris T. Higgins, DMG
Lynn Jones, DMG

REFERENCES

1. Smith, M.B., and others, 1971a, Reported occurrences of selected minerals in the central thiid of California: U.S. Geological Survey, Mineral Investigations Resource Map MR-48, scale 1:500,000.

2. Smith, M.B., and others, 1971b, Reported occurrences of selected minerals in the southern third of California: U.S. Geological Survey, Mineral Investigations Resource Map MR-49, scale 1:500,000.

The Resources Agency of California

- Conservation

Resolution:

1. Order 3 Geologic Resource Inventory has been added to the glossary. *The* purpose of this inventory is to describe regional geologic factors and designation of these factors as well as geologic resources. It would also address how these affect land allocations, general facility locations and management alternatives. Additional information is available in Exhibit 1 of FSM 2881.

2. Neither the public nor the Forest Service identified minerals as important enough to qualify for either a public issue or a management concern. *The* Sequoia National Forest is not a highly mineralized area, it has been heavily prospected in years past and is currently under scrutiny by many prospectors. There is only one operating mine on the Forest and it employs only one person. For over a million acres of land, this speaks volumes on the importance of minerals on this Forest.

   Analyzing potential impacts to a very small program is not cost-effective and has not been identified as an issue or a management concern.

   Within the planning period, prospecting will continue; however, few, if any, mines are expected to materialize. If, for some presently unknown reason, the minerals picture reverses itself, changes to the Plan can be recommended.

3. The year 1982 was the year we were instructed to use - for reason of consistency. The 1982 figures may be fractionally higher than average, because this was just a couple of years after a sharp rise in the price of gold, Things have since tapered off somewhat, thus over a period, cyclical changes will occur due to the rise and fall of the mineral market.

4. Geothermal resources are considered to be of minor importance on the Sequoia National Forest at this time. Little interest has been shown in this area and there has been no development for heating or power.

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GEORGE DEUKMEJIAN Governor

DEPARTMENT OF FISH AND GAME
REGION 4
1234 E Shaw Avenue
Fresno, CA 93710
(209) 222-3761

April 11, 1986

James Crates, Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Subject: Sequoia National Forest Land and Resource Management Plan and Draft EIS, Department of Fish and Game Comments

Dear Jim:

The attached represents our comments regarding the Sequoia National Forest LRMP which the Department Of Fish and Game forwarded to the Resources Agency. You may already have received them as part of the Agency's comprehensive (multi-departmental) comment letter.

Please regard the attached materials as our official Department comments in the event either (1) the Agency letter is not received prior to your closing deadline for the comment period, or (2) the attached Department of Fish and Game comments are not included within that letter. (Because we were late in furnishing our comments to the Resources Agency, it is possible that our comments may not have been included.)

If you have any specific questions about the comments, or would like to discuss them in general, please do not hesitate to give me a call. I feel it would be in the best public interest for our staffs to meet and discuss the issues, and possible remedies, as early as possible during development of L e FEIS and Final Plan.

Sincerely,

George Nokes

George D. Nokes
Regional Manager

2491

1. Gordon K. van Vleck
secretary For Resources

April 22, 1986

2. Gordon F. snow
Projects Coordinator

Sequoia National Forest Land and Resource Management Plan and Draft EIS

The Department of Fish and Game has reviewed the Sequoia National Forest Draft Land and Resource Management Plan (LRMP) and Draft Environmental Impact statement (DEIS). our comments are submitted in four parts: (1) this letter comprising our general comments on bath documents, (2) Addendum 1, containing comments focusing on natural diveesity. (3) Addendum 2. addressina syecific concerns on the Draft Forest plan, and (4) Addendum 3, containing specific comments on the Draft EIS.

Comments in Addendum 1, while addressing specific natural diversity issues, also identify problems inherent in the planning process. For the purpose of this review, we have confined our detailed comments (those in Addendum 2 and 3) to the statements actually made in the two planning documents. We recognize that they are critical in nature, and in some cases, the comments may not provide supplemental, technical information. Much of that information has been furnished to the Sequoia National Forest (SNF) staff in the past through rather lengthy consultation duriny the Plan's development.

Earlier consultation included our direct input to the Plan through; (1) direct assignment of a DFC wildlife biologist to the Forest's full-time planning staff for a period of 2 1/2 years, (2) numerous staff-level discussions regarding resource concerns and problems on the SNF, (3) comments on their preliminary draf: LRMP in 1985, and (4) direct participation on the Forest service Regional Interdisciplinary Team over the pas: two years. We are disappointed that this consultation is not evident in the Draft Plan and its accompanying DEIS, as published. 1

Despite our lack of success in affecting their LRMP and DEIS so far, ne intend to continue to provide cocstructive input to the Forest's planning process by offering technical information and consultation to the Forest staff. This will be directed toward assisting them in development of an adequate Final LRMP and EIS. We consider that consultation process essential because the SNF has no fisheries or wildlife biologist on its existing staff. 2

This Plan, if adopted, will have far reaching implications regarding the future status and management of fish, wildlife and native plants on all public lands within its scope.

Commensurate with the importance we attach to this and future plans submitted by the SNF and by the other National Forests, we have made every effort to provide a thorough analysis of the content of these documents and to develop an objective evaluation regarding the degree to which we feel fish and wildlife needs have been met. Based on our analysis, and supported by the comments that follow, we conclude that both the proposed Plan and the accompanying DEIS are substantially deficient in their treatment of fish, wildlife, and native plant resources. We believe that the adoption of this plan as it is written would result in significant adverse impacts to these resources.

2 we believe that a commitment must be made that monitoring will, in fact, occur. That commitment should guarantee that qualified personnel will conduct the required monitoring.

we intend to provide the information very soon to enable the Forest's staff to use it in guiding development of the Final Plan and EIS. It will not, however, be completed prior to the closing deadline for acceptance of Comments. The Forest's use of the supplemental material will, therefore, be at its own discretion, although we encourage the Forest to take it into consideration.

we invite any general or specific questions, and will be available upon request for further consultation. Please do not hesitate to contact us. Inquiries should be directed to George Nokes, Regional Manager, 1234 E. Shaw Avenue, Fresno, CA 93710, Telephone (209) 222-3761.

Original signed by Peter Bontadelli for
Jack C. Parnell
Director

by George D. Nokes

Attachments (3)

REFERENCES

1. Smith, M.B., and others, 1971a, Reported occurrences of selected minerals in the central thiid of California: U.S. Geological Survey, Mineral Investigations Resource Map MR-48, scale 1:500,000.

2. Smith, .B and others, 1971b, Reported :currences c selected m erals in the n third c California: U.S. Geological Survey, Mineral Investigations Resource Map MR-49, scale 1:500,000.

ADDENDUM !

GENERAL COMMENTS ON THE
SEQUOIA NATIONAL FOREST LAND AND FESCURCE MANAGEMENT PLAN
AND DRAFT ENVIRONMENTAL IMPACT STATEMENT -
NATURAL DIVERSITY ISSUES

3 We have concluded from extensive review of the documents that commodity outputs, principally timber and livestock grazing, are treated as overriding forces in allccating land uses. This concerns us since National Forest Policy clearly states that fish and wildlife resources will be given co-equal consideration and the protection of natural diversity may not be possible otherwise. To achieve co-equal status will require a degree of plan specificity and land allocation for fish and wildlife commensurate to that afforded commodity production.

4 A major flaw in the Plan is the assumption that all fish and wildlife resources can be protected acd enhanced as a by-product of other dominating land uses. This problem is illustrated by the absence of specific land or habitat allocations for fish and wildlife. The majority of forest lands not protected by wilderness status have been allocated to various levels of tinber range management or recreation. Specific treatment measures call for extensive pest control, conversian to even-age management, ana the reduction of hardwoods. The concomitant loss of important wildlife habitat and diversity will result in significant inpacts which are not recognized in the Plan or DEIS.

The maintenance of natural diversity, especially where it concerns species most in danger of extirpation, is an important mission of the Department; we have therefore devoted a considerable amount of effort analyzing the treatment of this subject in these comments.

5 Before discussing the substance of these comments, we want to emphasiza three important points. First, the Natural Diversity Data Base (NDDB), which the Department has assembled over the past 5 years, contains much of the scientific information upon which we are basing our comments regarding natural diversity. It appears that those who prepared the Plan did not consult this information. We urge the Forest to make use of it in preparing the final documents. The staff of the NDDB would appreciate receiving copies of rare plant and animal survey reports, forms and appropriate documentation by the Forest.

6 Second, the Department has devoted a considerable portion of staff time to reviewing and coordinating our recommendations and comments on this and all of the preceding stages of planning.

Our regional personnel, as well as a specially assigned Regional Planning Team Xember, have been at the Forest's disposal for this entire period. Unfortunately, the Plan does not reflect this effort, or the expertise we have tu offer.

7 Third, the Department believes that for the Forest to comply adequately with the letter and intent of the National Forest Management Act of 1976, and in particular Section 1604 (g)(3)(b), the Forest Plan must demonstrate the ability and intention of the Forest Servise to manage and preserve all of the rare species presently found in the Forest. Absent proper management, these species are the most likely to be adversely affected by human activities.

The treatment of botanical diversity in the Plan and DEIS is of particular interest to the Department. It is especially inportant on the SNF since over 1/4 of the plant species that occur in the State can be found on this Forest.

8 In Chapter 2 of the DEIS, the planning alternatives are discussed, but the treatment of rare plants (especially if, where and how they are protected in designated areas) is not compared between the alternatives. These issues should be addressed, especially since on Page 4-50 of the DEIS it is asserted that the amount of sensitive plant habitat found in designated areas was compared between alternatives.

9 The goal of the LRMP, as stated on Page 1-1 of the Draft Forest Plan is to "provide a management program reflecting a mix of activities which allows use and protection of Forest resources". We believe the Preferred Alternative selected by SNF fails to meet this goal in regard to protecting and maintaining the fish and wildlife resources on the Forest.

10 On Page 2-8 of the LRMP under the chapter, Management Concerns. the Plan states that "Other than implementation of the Little Kern Golden Trout Management Plan, no other direct fisheries habitat improvement is planned ...". No effort is planned or obligated directly for fishery habitat work.

An estimated 60,026 fishermen used Sequoia National Forest in 1980. Angler demand is projected by SNF to increase 125% by 1990 to between 14,735 to 82,011 anglers. The present demand on the Forest fishery resource outside of wilderness is approaching the maximum harvest rate this limited resource can support. Projected future angler demands, if they should occur, are even further out of balance with the available resource.

It is anticipated that stocking of catchable-sired rainbow trout will be unable to keep up with the projected demand. In soma instances it may be necessary to decrease: the number of fisk stocked in a particular reach of stream to reduce angler activity and thus protect some streambanks from damage.

11 Some multiple use activities on the Forest have non-point impact on fishery resources. This is a cumulative impact which usually occurs in the form oi increased water temperature or

11 sedimentation. Both reduce the carrying capacity of the stream and result in fewer fish. This should be addressed in the Plan.

we recommend a shift in management direction to a more aggressive approach of restoration and/or improvement of the basic productivity of the riparian-dependent resources. This would mean a commitment of manpower and operating funds. The production of "goods" from the riparian zone should be included with Forest-wide goals along with timber and AUMs, and similar effort and funds expended in achieving those goals.

12 The Memorandum of Understanding between the Forest Service and our Department places the responsibility for fish and wildlife habitat on the Forest service and the management of fish and wildlife resources on the Department. Under the preferred alternative, there are no provisions for fishery habitat improvement work. It is doubtful the Forest standards and guidelines will maintain or improve aquatic habitat. There is an unrealistic assumption in the Plan about the future of the forest fishery. Approximately 77,000 pounds (1982 level) of resident fish have been estimated on the SNF. It is incorrectly assumed that this value will remain constant into the 5th decade of the LMP without fish habitat enhancement activities.

without provisions for habitat maintenance and/or improvement, the number of pounds of resident fish on the forest will decline. The increase in activities that indirectly result in a decline in fish habitat will result in a corresponding reduction in the carrying capacity of streams. New road construction and associated timber production will most likely be the primary factors in the decline of trout habitat. Under the PRF alternative, there will be 58 miles of road construction/re-construction on the forest annually. According to the PRF alternative, only "About 30% of the conifer
13 zone will remain unroaded". Annual harvest of timber will average 104 million board feet. Cattle grazing will increase from the current level of 63,000 AUMs to 71,000 AUMs annually. Some cattle grazing will no doubt occur along streams, and without protection, streambanks will be damaged resulting in a reduced carrying capacity for fish.

The Forest and Rangeland Renewable Resources Planning Act of 1980 sets the following goals for fishery resources on forests: 1) by 1995 provide for increased habitat at 80% or more of potential, 2) by 1995 provide for increased habitat capabilities, and 3) increase RFA management indicator species (resident trout) by 20%.

Riparian dependent resources must be intensively managed if they are going to continue to meet the expectations of the public (including RPA goals). Best Management Practices (BMP) would be a big step in the right direction.

While meeting RPA goals may be difficult due to naturally occurring habitat conditions on the SNF, their attainment is also influenced by the amount of effort and funds available for habitat repair and enhancement. Equally important are the effectiveness of BMPs and riparian management prescriptions and the dedication to their implementation. None of these concerns are addressed by the preferred alternative.

14 We are very much concerned about the proposed budget under the PRF alternative. The projected budget under the current (CUR) alternative is $15.8 million. It is our understanding the Sequoia is operating on about $10.5 million. Under the current atmosphere of fiscal restraint, it is safe to assume that there will be reduced funds for operating, and consequently, the projected $19 million operating budget under the PRF alternative is not realistic. If this assumption is correct, then several aspects of the PRF alternative must be reevaluated.

Under a reduced operating budget, where will the cuts in the PRF alternative be made? SNF personnel have stated in public meetings that various segments of the plan will probably be prioritized and cuts made accordingly. Since the Forest Service has timber and AUM targets to meet, it is logical to assume that these may have high priority and other areas of the Plan will receive the largest cuts. Among those that have the greatest potential for budget reduction are fish and wildlife management and monitoring.

15 The Plan states that the PRF "alternative produces market and non-market resources close to the 1980 RPA". This is not a correct statement as it pertains to the goals set in the RPA for fisheries.

16 It is not clear why some of the concerns for fishery resources on the Forest as outlined in the WFV alternative are not included in the PRF alternative. Tie lack of this consideration is the primary reason the PRF alternative is unacceptable from a fisheries point of view.

17 The conclusion that under alternatives "PRF, CED, CUR, MKT, PRO, WLI and LBU the physical limiting factors are unchanged and native trout production will remain constant" is incorrect. All of these alternatives involve disturbance to soil and vegetation and in association with streams there will be some impact that must be mitigated by habitat improvement (only found in the WFV, A", and RPA alternatives). There will be impacts from the public in terms of resource use which is not compensated in any alternatives, except WFV, AMN, and RPA.

The Cannell Meadow District contains the greatest share of remaining high quality fisheries in the SNF, and according to the Plan this district will receive the greatest impacts from dcvelopnsnt.

18 The remaining high quality watersheds outside wilderness areas on the SNF are lccated in the Kern Plateau. We belisve these should be managed pricipally for fishery, wildlife and recreation resource values.

19 We believe some of the Forest's key wildlife habitat should have been allocated principally for wildlife purposes instead of requiring wildlife to compete with more dominant uses (e.g., tiaber, range, intensive recreation) over most of the forest. Even in the case of the limited areas of old growth habitht set aside for spotted owl management, a majority of the designated sites reflect other emphasis such as recreation use allocations and wilderness impacts.

20 The conservation and monitoring of "management indicator species' and other management tools employed in the development of the Plan may help to deal with care species, but only in part. For example, indicator species do not adequately represent all rare animal species and mast certainly do not represent all rare plants. All rare species must be accounted far in the Plan in a straightforward and positive manner. To do this, the Department recommends that in addition to the currently identified "indicator species', the Plan he revised to address at-least all species that are known to exist in the Forest that are (1) T & E (i.e., listed as threatened or endangered by the Federal Government and/or the State of California), (2) T & E candidate specres, (3) listed as sensitive by the Regional Forester, or (4) de facta rare species. By "address" we mean that specific quantified objectives, designed to achieve viable populations of these species, should be set forth in the Plan in accordance with FS Manual 2672.31 and 2672.32.

21 In addition, specific means for attaining these objectives, including the dedication of Research Natural Areas and Special Interest Areas, should be described. It is not sufficient to address the diversity issue merely by formulating plans to retain a certain percentage of the Forest in various timber types and seral stages. Unfortunately, the Plan fails to provide specific quantified objectives or means to reach them since management direction (see Plan Page 4-29) requires maintenance of species composition only for major forest types where reforestation and thinning projects occur. The direction should refer to a minimum percentage of the total forest acreage that will be maintained in each vegetative type and seral stage (as vaguely described on Page 2-25 of the DEIS), what those types and stages are (giving special attention to uncommon types and stages). and a requirement to actively manage the forest to attain these objectives. It is not adequate to address the issue only "where reforestation and thinning projects occur".

22 Both the Multiple Use Sustained Yield Act and the National Forest Aanagement Act provide adequate guidelines for forests to manage

lands for uses other than those producing the greatest economic output. We, therefore. assume that a more equitable balance of land use allocations could be achieved. It is our belief that the intent of both acts was to achieve this balance.

The National Forest Management Act also specifically states that regeneration cutting is to be carried out only where consistent
23 with fish and wildlife protection. Timber prescriptions in the Plan provide for regeneration cutting as the dominant management form. No significant constraints are provided for the protection of fish or wildlife, nor were any other less intensive forms of timber management discussed.

A portion of Chapter 4 of the Plan is designed to describe fish and wildlife goals and objectives, Forest-wide standards and guidelines, desired future conditions of these resources. and resource outputs. A major problem with this most critical section of the Plan is its lack of specificity. This is especially true for the standards and guidelines since they will ultimately determine if the goals are achieved.

Item #1, under "Wildlife and Fish" on Page 4-3 of the Plan, is a goal pertaining to formally-listed threatened and endangered species. There are no species-specific objectives described. These are found on Pages 1-62 and 63 of the DEIS for peregrine falcons, condors, spotted owls and goshawks. To make any sense to those interpreting the Plan, objectives should be described in the
24 Plan -- in juxtaposition to the goals, standards and guidelines. Moreover, it is vital that the Plan state clearly the goals and quantified objectives for all indicator species, T & E, candidate, sensitive, and de facto rare species of animals (and plants) that exist in the Forest. or describe the manner in which they will be developed. Such goals and objectives should also be integrated into the description of the "Theme" for the preferred alternative found on Page 2-56 of the DEIS.

On Pages 4-37 through 4-100, the Plan describes 26 "Management Area Prescriptions", in which certain management practices and activities will be applied. We recommend that the Plan describe: (1) a specific management prescriptions for critical habitat of indicator species, T & E, candidate, sensitive, and de facto rare species (includang, for example, spotted owls, goshawks, and peregrine falcons); (2) devise particular management practices to treat such habitat; (3) assign specific portions of management areas (where the critical habitat exists) to such prescriptions as are appropriate and clearly indicate their locations in the Plan: and (4) describe additional management direction for a management area where a prescription is inappropriate but habitat of the rare or sensitive species is known or believed to exist.

25 on Page 3-55 and a portion of 3-56, the DEIS discusses "management indicators", identifies the species chosen to "determine changes

in habitat', and reveals that they are grouped into six categories 'for analysis purposes". Neither this section of the Plan nor any other section of the Plan or OEIS discusses how these species are used in planning or Forest management other than a short reierence
25 to monitoring trends id habztat capability and their relationship to represented species (Plan Page 3-8). This type of monitoring has nothing to do with whether or not the species chosen as indicators actually relate to changes in habitat or how they are "used" to determine such changes (as might be expected by the tltle of Table 3.16). Further, even though these indicators are "grouped into 6 areas for analysis purposes", nowhere in the Plan or DEIS is there any indication that these species or anything about them will actually be analyzed. since the NFMA regulations specifically require that habitat for each management indicator species is maintained and enhanced, the Plan should clearly indicate how this will occur -- for each species. The incidental effect of management actions aimed at other species or resources is insufficient to meet this legal requirement; the Plan should demonstrate an affirmative approach to the maintenance and enhancement of habitat of each rare species.

In addition to the failure to use these 12 "indicator species" or "management indicators" appropriately, we question the logic of the species chosen. Throughout the very cursory treatment of management indicators, nowhere are specific species actually labeled as "management indicator species". This should be done. for example, the raccoon is listed as a species associated with rfparian zones. If this is meant to imply that there is a direct relationship between the condition status of the raccoon population of the Forest and the status of the riparian zones of the Forest and its other associated species, then we disagree. If this is meant to imply that damage caused by grazing in the riparian zone will have the same effect an raccoons as it will on yellow warblers. willow flycatchers and golden trout, then we disagree. The OEIS and Plan should explain exactly why each of the species chosen as indicator species were chosen, and what the management implication will be if there is a change in an indicator.

CFR Section 219.19 states that fish and wildlife habitat shall be managed to maintain viable populations of existing native and
26 desired non-native vertebrate species in the planning area. For planning purposes, a viable population shall be regarded as one which has the estimated numbers and distribution of reoroductive individuals to insure its continued existence is well histributed in the planning area (emphasis added).

In order to manage habitat to maintain viable populations, the above-quoted regulation very clearly indicates that specific quantities of reproductive individuals must be distributed in a manner appropriate to insure the continued existence of each taxon. For species in which viability is a concern (i. e., all T

6 E, candidate, sensitive. and de facto rare species), neither the Plan nor the DEIS describe exactly what a viable population is consiiered to be in terms of estimated number- and distribution of reproductive individuals. In no case is there a description provided of how viable population levels are actually calculated or the assumptions. probabilities, and risks associated with that level. The Plan should contain such information.

27 The adoption of any Plan which sets as its goal the maintenance of only minimum viable populations demonstrates a lack of understanding of the dynamic nature of ecosystems. Such a plan presupposes no unforeseen Circumstances which may influence the ultimate outcome; for example, fire, disease or other disasters could reduce populations below the critical minimum level. It also leaves no margin for error. If, in fact. the measures provided for wildlife protection prove to be insufficient to achieve objective population levels, the opportunity to reverse the damage may be lost.

28 All of the rare, endangered. and sensitive species found in the SNF arc not addressed by the DEIS and Plan: standards and guidelines are "provided" specifically for only Little Kern golden trout, condocs, and peregrine falcons. (A short discussion of goshawks and spotted owls is obscurely located on Page 8-32 of the DEIS Appendix). On Page 3-53 of the DEIS (Table 3.15), T 6 E and sensitrve animal species are listed. Yet, except for the condor, goshawk, peregrine falcon, and spotted owl, none of these taxa are listed as management indicator species. There are no comparisons of the treatment of their habitats between alternatives; there are no objectives stated to maintain viable populations as required in FSM 2672.32; there are no indications that surveys will be conducted to determine populafion and habitat status and trend; there are no means described to improve habitat; and there are no plans for monitoring their populatians and habitat. The Department recommends that these issues be addressed for each of these species, as well as for other more common specres which will be directly and indirectly affected by implementation of the Plan.

29 Additionally, NDDB records indicate that the following species are found in the SNF and should be included with the other sensitive species mentioned in the above paragraph:

South Fork Kern golden trout (Salmo aquabonita aquabonita)
Inyo Mountains salamander (Batrachoseps campi)

These species should be listed as sensitive species; but notwithstanding, the Regional Forester's action to list these species, the Forest Plan should treat them as functionally sensitive specfes. Table 3.15 also contains errors. Each of the species indicated as state-listed rare are now listed as "threatened".

The Sierra Nevada red fox is also a state-listed threatened species.

30 Despite the repeated assertions throughout the Plan and DEIS that T & E and sensitive species are to be recognized and protected, there are no specific indications of the intent to inventory and survey species to determine basic information such as where certain taxa are located in the Forest. In Appendix B, Page **a-2**, the Plan discusses "Research Needs" for fish and wildlife; the section shorld provide for status surveys and inventories for all T & E, candidate, sensitive; and de facto rare species where information is inadequate. Surveys for great grey owls, willow flycatchers, golden eagles, Breckenridge Mountain salamanders, and goshawks are most important. Where such information is adequate, the Plan should contain provisions to use the data to determine strategies for maintaining viable populations of the species.

With respect to nonitoring, CFR Section 219.19 (a)(6) states:

> Population trends of the management indicator species will be monitored and relationships to habitat changes determined ... (emphasis added)

It is difficult to monitor population trends without monitoring populations of the subject organisms. Yet, the Plan provides for monitoring of habitat capability. The Plan should indicate what is meant by monitoring habitat Capability. The monitoring plan should also contain provisions to periodically review the actual population status of all species for which viability may be a concern.

31 Monitoring should be capable of reliably revealing the status and trend of population size and population distribution and relate each of these parameters to a standard which constitutes the Plan's estimation of what is needed "to insure (the species') continued existence...in the planning area". (See CFR Section 219.19 **as** quoted under the heading of "Viability"). In addition, we recommend that not only should all Management Indicator Species (MIS) be monitored (since monitoring is one of the primary reasons that KIS are identified), but all T & E, candidate, sensitive, and de facto species found in the Forest be monitored at least as often as **MIS**.

Correctly done, monitoring is an important aspect of the LMP since the results indicate how well the goals are being met. Results of the monitoring dictate what changes, if any, are needed when the LMP is reviewed in the future.

32 With the recent elimination of Forest biologist and botanist positions, it is necessary to inquire who will be available to conduct the mandatory monitoring as set forth in the LMP? Given the current circumstances, it is doubtful that the monitoring obligation can be successfully met.

In conclusion, the Department recognizes that the SNF has expended a great deal of effort in the preparation of these draft planning documents. While this is Laudable, we feel the issues of fish, wildlife and natural diversity, especially the treatment of rare plants, animals, and natural communities, require
33 considerably more attention than they have received. This is needed before even the minimum legal reqcirements will be satisfied. We encourage the Forest to consider fish, wildlife and native vegetation as opportunities rather than as constraints upon utilization of other resources. To exist above bare "viability" levels, these resources shoula not have to become secondary by-products of the management of other resources.

We ace not suggesting that a fish and wildlife alternative should be preferred at the expense of other resources and uses, and we recognize that sometimes it is impossible to maximize goals for competing products. However, we believe there is a clear public mandate that a plan be developed which manages fish and wildlife at a reasonable level of priority. Where conflicts occur, the Forest is charged to arbitrate, without unreasonably risking or deteriorating any of its "multiple use" resources.

The three attached addenda represent major comments on the natural drversity issues, as well as our detailed comments concerning specific textual citations from the LRMP and DEIS. We incorporate them here by reference. While our comments may Seem unduly critical, we offer them in a constructive vein to assist the Forest's planning staff in achieving an improved balance in resource management goals. Although some of our comments appear repetitive, each is directed toward a specific statement, table or section of the Plan or DEIS and has a distinct bearing on the ultimate analysis of the feasibility and validity of these documents. Because we recognize that the Plan will shape the uses and character of the Sequoia National Forest for many years to come, we feel that they are both necessary and appropriate.

We intend to provide supplemental materials to the Forest staff in the near future. Because these materials will not pertain to the specific contents of their draft documents, as published. they were not included as a part of this comment letter. Rather, they are offered in the spirit of cooperation, in response to the Forest's request to George Nokes, Regional Manager of our Fresno office. They will (1) suggest a preferred fish and wildlife alternative; (2) suggest revisions to existing management prescriptions, definitions, standards and guidelines; (3) recommend additional prescriptions, standards and guidelines; and (4) identify specific fish and wildlife habitat enhancement opportunities.

ADDENDUM 2

COMMENTS ON THE SEQUOIA NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN DRAFT FOREST PLAN

34 1-1: Under "Vision Statement" we note the absence of management of wildlife habitat as a key action.

35 2-3: The statement regarding sediments should identify specific acceptable standards.

36 2-7: A. The specific locations and sizes of areas to be managed for threatened, endangered and sensitive fish, wildlife and plant species should be disclosed.

These questions are not answered for any of the listed species, except golden trout. Because the alternative establishes specific direction which will reduce the habitat and abundance of spotted owls and most other species, the extent of the habitat to be retained must be shown in detail for each of those species.

B. The location and size of areas to he managed as special wildlife habitat for harvest species should be disclosed.

In the considered alternatives, conflicting recreation (ORVs) or commodity uses (grazing, timber1 consistently appear to be given priority over associated wildlife management activities, with associated wildlife reductions.

C. None of the proposed alternatives will maintain the existing numbers of fish. The lack of management action will result in net losses of both native and non-native species.

D. In all of the alternatives, recreation, timber, and grazing are increased at the apparent expense of wildlife. Even at current commodity output levels, fish and wildlife resources are experiencing adverse impacts (based upon our observations). Despite planned increases in most of the other uses, no accomodation to recover the fish and wildlife losses is evident. Consequently, the "trade off" is toward one-sided benefits which, we believe, wrll significantly reduce the public's opportuniy to enjoy fish and wildlife

E. Under the stated plan objectives we strongly disagree that wildlife habitat will be improved. Specific wildlife habitat types will be lost due to planned

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timber harvest activities and increased grazing use after burning. Intensified treatment of timber harvest areas will reduce wildlife use of early-mid seral habitat stages.

The plan states that black oak, snags and downed logs will be maintained at "prescribed levels". It fails to state that these 'prescribed levels" are significantly less than what now exists. This is a serious problem, considering that already the availability of these habitats appears to be restrictive to wildlife populations.

While many techniques are available for improvement of fish and wildlife habitat, few have been considered in this plan, except to analyze their possible conflict with other proposed uses.

37 2- 8 Line 30: The plan discusses but does not display a road closure plan for the Sequoia National Forest. This should be part of the present Plan. It should state the timing and reason for specific road closures, and be made available for public evaluation.

The criteria for designating closures should be identified.

38 2-10: We do not consider annual increases of 8,000 AUMs in the first decade (and 26,300 AUMs by the 5th decade1 to be "slight" increases, as described. The proposed increases are particularly significant consrdering that the baseline year grazing rate (63,000 AUMs in 19821 is already much greater than what occurred in the recent past (the 1979 race was only 44,100 AUMs).

During the process of planning issue identification, the public expressed concerns about excessive livestock use. As a result, a specific "Grazing Issue' was considered. Despite this public concern, the Plan proposes to increase livestock use.

2-11 Line 4: Topography, soil type, water quality, flow, recreation and adjacent land uses should also be considered
39 in designating Stream Management Zone width. Stream class alone is inadequate as a width determinant.

While the Plan states that SMZs are not managed for timber and that roads and trails are restricted, it should also clarify that these activities will still occur in SMZs. They do occur, with associated losses to the aquatic and ripacian resources.

40 2-11: Our general comments in Addendum 1 discuss diversity which we believe has received inadequate treatment in both the Plan and DEIS.

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41 3- 6, 3- 7: The statement that the availability of firewood is the" most" important use of the National Forests by retirees and working families is unsupported. If this point is to be made, the Pian should display statistical evidence on the number of individuals that benefit from this cctivity compared to those who benefit from other uses, such as wildlife and fisheries (which are directly benefitted by dead and down woodl.

42 3- 7: It is misleading to discuss the value of commodities to those individuals who work in the timber and livestock industries on the Forest without quantifying the segment of the forest owner/users whom these people represent. The level at which the Forest participates in each of these industries relative to private lands is also a significant consideration.

43 3-17: Sacramento perch is a native species.

44 3-17: We are unaware of specific stream surveys on 732 miles of stream. We would like to review the survey data as part of our review of the Plan. We also need to see which sections are rated as "good", "fair" and "poor", and the rating criteria used.

45 3-17: There are many opportunities for stream habitat improvement which should be considered in the Plan. Solutions should be developed to water-quality/spatial-habitat problems such as elevated temperatures. reduced flows, and sedimentation. All the above are the result of management activities (primarily logging, water diversion, road construction, grazing, ski area development). The plan should cleaely addeess these conflicts, rather than implicate natural causes as the major cause of the problems.

46 3-18 to 19: This section fails to describe existing conditions for spotted owls, goshawks, etc. What are current and future trends for these animals? How is Forest land management related to existing condition and trend?

Fisheries information is inaccurate as provided. Habitat sedimentation and damage due to man's activities are much more serious and permanent than fish population reductions due to angling. Adverse competition with planted trout also has never been documented on the SNF as a serious problem. Heavy fishing use can damage habitat on some streams. but is not a significant problem in comparison with damage from road construction, grazing, timber harvest, etc.

47 3-18 Line 10: There is no evidence to support the statement that stocking of hatchery trout is responsible for depleted resident trout populations through competition. Our data indicate that stocked fish "buffer" the wild fish

populations from impacts of over-harvest. Over-harvest can be controlled through regulation adoption and enforcement.

48 3-18 Line 17: With the exception of heavily used areas, such as trail crossings, campsites and some lakes, .fish populations exceed the consumptive demand in most areas of the wilderness. Supply of fish, except in a few heavily-impacted areas, could continue to exceed user demand through the 5th decad: of the LMP, given aooropriate habitat protection.

We would like the opportunity to review the data basii for the statement that only 46 miles of stream on the Forest could benefit from fish habitat repair work.

49 3-19 Line 17: Golden trout (South Fork Kern) and Breckenridge Mountain slender salamanders should be listed here.

50 3-19: Consumptive use of the Forest's wildlife appears greatly under-estinated. The Plan represents the 43,000 WFUDs (1982) as "almost totally deer hunting". Our data, however, conflict. A total of 16,622 deer tags were sold and 578 deer were harvested in Zones D-8 and D-9 in 1982 (primary hunting in these 2 zones is on the Sequoia National Forest). The 1982 Annual Hunter Survey showed that the average deer hunter hunted 6.5 days. As such, the number of WFUDs based on deee alone greatly exceeds 43,000. The number of hunters taking gray squirrel, bear, quail, rabbits, band-tailed pigeons, blue grouse, and wild turkey are not cecognized. Likewise, user days expended hunting and trapping bobcats, coyotes, raccoon and gray fox are not considered. Non-consumptive resource use is also ignored. Based upon the above facts, we consider the analysis of wildlife values inaccurate, as presented. The data inadequacy would impact all economic analyses in which the Plan compares wildlife values with other resources. All should be recomputed.

51 3-19: How can these stated facts be reconciled with the conclusion that hunting use is expected to remain about the same? The jointly signed deer herd plans for migratory herds on the Forest call for substantial additional deer hunting opportunity. The LMP also calls for increased deer numbers.

52 3-29: The Sequoia's analysis regarding range use fails to state that current (baseline) range use (1982 level) is already substantially elevated above recent past use levels (it was only 44,700 in 1979).

53 3-33: There is no mention of disturbances caused by development and operation of ski resorts. For example, vegetation removal, road construction, heavy equipment operat-on, traffic, sewage disposal, water consumption, winter disturbance of wildlife and watershed damage are all significant considerations.

54 3-38: The statement that the recreational benefits of chaparral management include " increased hunting opportunity" directly conflicts with the earlier analysis of wildlife use (Page 3-19) showing that "hunting use is expected to remain about the same'.

55 3-40: The glossary in the DEIS adequately defines riparian area as 'land situated along the bank of a stream or other body of water and directly influenced by the presence of water". The definition of "riparian", as presented here, however, is too restrictive. It is limited by a width parameter (a SMZ) based on timber interests rather than biological criteria.

56 3-40: The plan fails to provide a summary of the riparian management analysis as required by National Forest Land Management Planning Direction, Section 3-8 (A).

57 3-42: Black oak woodland is a critical area for wildlife diversity. The retention of 20-25 rq. ft. basal area per acre may maintain wildlife, but this "maintenance" would occur at reduced "minimum viable numbers . The Plan should be modified to clearly state that wildlife habitat and numbers will be reduced if 10-25 cords of black oak are harvested per acre.

58 3-43: The discussion fails to acknowledge blue oak woodland as valuable habitat for wildlife. As such, current levels of livestock use (in addition to the proposed future increases in range use) are detrimental to wildlife through loss of oak mast and forage competition. The 'Analysis of the Management Situation" also fails to acknowledge the existing failure of blue oak stands to regenerate due to livestock Overuse. Given the proposed additional use of blue oak woodland, regeneration is a critical point which should be fully addressed in the DEIS. The Plan should include specific measures to remedy the existing overuse-associated problem.

59 3-43: Live oak woodland has significant value to wildlife. It provides substantial forage and cover to numerous wildlife species and should be managed as a desirable feature.

60 3-47: It is our opinion that deferral of the Wild and Scenic River decision for section 1 of the Kings River, pending completion of Kings River Conservation District's feasibility study for upstream river development is inappropriate based upon the stated intent of the U.S. Wild and Scenic Rivers Act. The Act requires Federal Management Agencies to evaluate the "outstandingly remarkable aesthetic and recreational values" of river corridors and where appropriate, to propose them for inclusion in the nation's Wild and Scenic River System. We believe the intent of the Act is not to wait until competing interests have developed

feasibility studies and then force the esthetic and recreational values to compete with development interests in the economic arena. If the Kings River now has outstandingly remarkable values, the Forest shoula proceed to make the evaluation.

We believe remarkable values are definitely present. (1) The river corridor, within section 1, provides essential deer winter range for the troubled North Kings deer herd. (2) In addition to deer, the corridor provides habitat for many other wildlife species. These include sensitive species such as peregsine falcons (historically), prairie falcons, golden eagles, bald eagles, and wolverines. (3) The river itself is a high quality trout fishing resource which has been designated a "Wild Trout Stream" by the State Fish and Game Commission (due to its outstanding natural potentials). (4) The corridor provides an all-year-accessible recreational area within reasonable distance of large urban centers. Recreation includes rafting, camping, fishing, nature observation, picnicking, sightseeing, birding, swimming, hunting, hiking, etc., which is available and easily accessible to the general public. (5) The river provides these activities in a "large river atmosphere", which is uncommon regionally within the San Joaquin Valley area.

61 3-47: We believe the division between section 1 and section 2 of the South Fork Kern River should be made at the Forest boundary, rather than the wilderness boundary. Based upon the study, it appears classification for section 2 (Forest boundary, upstream) should be "wild". We see no differences in the quality or user values above versus below the wilderness boundary. We believe Section 5 (Monache Meadows) should be classified as "wild", since it lies between the two existing wilderness areas, and influences both.

62 3-48: Designation and management of wilderness areas should contain provisions for management of native fish species (chemical treatment, barrier construction, habitat improvement, etc.).

63 4- 3 Lines 7-11: Item 3 calls for "increased wildlife and fish habitat capabilities on National Forest by 1995". but the means for achieving this goal is not stated in the Plan.

Item 4 calls for providing "increased quality and quantity (emphasis added) of opportunities for enjoyment of consumptive and non-consumptive uses of the wildlife and fish resources". Under the preferred alternative however, this goal cannot be met. Improvements in the quality and quantity of the fishery resource will only occur if (1) habitat improvement is included as part of the LMP, and (2) other land management practices are appropriately conditioned.

64 4-3: Range goals to "optimize red meat production" and "provide optimum sustained yields of forage" will prevent attainment of wildlife goal #3 (4-3). tivestock already create substantial fish and wildlife impacts on large areas of the forest through degradation of riparian/meadow habitat and competition for available browse and mast. The proposed additional range use will aggravate this situation in the absence of positive measures to reduce or compensate damage.

65 4-3: The Plan has not shown satisfactory justification for managing to optimize livestock grazing and provide optimum sustained yields of forage. Unfurtunately, "optimization" of grazing-as described precludes management for fish and wildlife, even at maintenance levels.
This conflict should be addressed.

66 4-4: Increases in both total timber supply, and short-term timber offerings ace proposed. It is not possible to increase these conmodities without accompanying damage to already-impacted fish and wildlife resources. The projected outcome does not, in our cpinion, conform to the general goal of 'multiple use".

67 4-7: We disagree that fish populations in non-wilderness areas will maintain their current Levels. Increases in Iand disturbance (causing aquatic habitat degradation) can result from proposed timber and livestock use increases. These, in the absence of provisions in the LMP for fishery habitat restoration/enhancement, in turn will result in an overall decline in fishery resources.

68 4-7: All of the considered alternatives call for a planned decrease in habitat (and populations) of old growth-dependent species. Given the identified remnant patches of habitat to be retained for such species as spotted owl, how can the owl "remain in all areas currently inhabited", as stated?

69 4-7: We strongly disagree that oak and snag associated wildlife will decrease only slightly. Oaks and snags will be removed entirely over tens of thousands of acres of forest land under clearcut management. The retention of oaks and snags on unharvested forestland will do nothing to reduce wildlife losses on the harvested lands. This should be clearly disclosed in the plan.

70 4-7: Why will ripari n areas e managed on y to maintain oc restore abitat for late successional stage species Riparian habitat is recognized as key wildlife habi inc should e managed to maintain or improve its s atus for all ed wildli e It is our interpretation that issed species managemen: li violate the intent of NFMA and present National t anagement Directives.

71 4-9: The forest has projected substantial benefits to early successional wildlife from increased clearcutting and chaparral management. Yet the "Summary of Future Range Resource Condition" clearly states the intent to stock the managed lands with substantially more livestock. This action would have impacts upon habitat quality for wildlifer a conflict which is inadequately addressed in the plan and/or DEIS.

72 4-9: 600,000 additional visitor days per par resulting from new ski resorts could have significant impacts upon biological resources. These should be discussed in detail.

73 4-10: The planned maximum consumptive use of meadow vegetation (range goal #3, Page 4-3) assumes that wildlife needs can be coincidentally provided. We disagree that meadow forage can be utalized by livestock at the levels proposed, "while meeting wildlife needs". This approach offers no benefits to wildlife habitat.

74 4-10: The Plan should contain provisions to control grazing in meadows where damage is perceived.

75 4-12: Grazing of 8,000 acres of coniferous zone, as proposed, could be managed to favor wildlife and recreation without significantly reducing grazing on the Forest. This would require specific guidelines and limitations on the density and extent of grazing.

Developed recreation (CF3) could also be managed to protect Forest natural resources, thus reducing described conflicts.

76 4-13: Wildlife - Other than T & E Resident fish ace predicted to maintain a biomass of 77,000 pounds on the forest. In the absence of specific measures to protect or improve aquatic habitat (see our general comments), we doubt that such maintenance levels will occur.

77 4-13: Developing existing non-roaded areas precludes future opportunity to meet increasing wilderness use demand. This implication should be disclosed.

78 4-14 Table 4.2: Wildlife and fish User Days: The Plan should include commitments for direct fish habitat improvements and a description of their anticipated FWUD benefits.

79 4-14: Watershed: Increased water quantities could damage aquatic habitats by increasing flood flows (streambank erosion) and reducing existing dry-season flows (spatial habitat reduction and temperature elevation). These effects should be addressed.

80 4-15: Transportation: Standards for new road construction are not sufficiently detailed to prevent site specific sedimentation problems in stream habitats. They should be revised.

81 4-17: We support moving trails out of meadows where resource damage is occurring.

82 4-18: Opening of 677,000 acres of the sequoia National Forest to OEV use without adequate staff (to assess resource damage), site specific standards/guidelines (for resource protection) and supervision will lead to damage of wildlife habitat Such risk should be addressed. There is a substantial body of scientific data shdwing that OHVs have both direct and indirect impacts to vegetation and wildlife, even with light to moderate use. OHV use should be more closely regulated than is proposed in the Draft Plan and Standards and Guidelines, as presented.

83 4-21: Recreation, Wild and Scenic River, Item 3: we believe Segment 1 of South Fork Kern River should extend only to the Forest boundary and should be designated scenic.

Item 7 - South Fork Kern River between South Sierra and Golden Trout Wildernesses should be designated "wild".

84 4-23: Wilderness, Item 2: Management plans should provide for stream habitat improvement and fishery management (barriers, chemical treatment, etc.) for native species protection and reestablishment.

85 4-23: We support the allowance of planned and unplanned ignition, prescribed fire in wilderness areas as a method to help restore wildlife habitat quality. Past fire suppression activities have reduced natural diversity on the Forest.

86 4-26: Fish and Wildlife: This section should also address South Fork Kern golden trout, Kern Canyon slender salamander, and Breckenridge Mountain slender salamander.

a7 4-26: We recommend that in addition to the standards for spotted owls (Strix occidentalis), bald eagles (Haliaeetus leucocephalus), northern goshawks (Accipiter gentilis), and peregrine falcons, standards and guidelines should be adopted which address habitat protection for the great gray owl (Strix nebulosa), Sierra Nevada red fox (Vulpus vulpus necator), fisher (Martes pennanti), wolverine (Gulo gulo), Kern Canyon slender salamander (Batrachoseps simatus), Inyo Mountain salamandr (B. campi), and South Fork Kern golden trout (Salmo aquabonita aquabonita).

To this end, standards should as a minimum require that the Forest: (1) survey the Forest for evidence of pairing or nesting of great gray owls (territories found should be protected). (2) spatted owl territories in the particular manner prescribed by the regional guidelines (specific guidelines are needed, rather that vague references to habitat capability models). (3) Delineate an area of at least 125 acres of suitable habitat surrounding goshawk nest stands (in accordance with the results of the 1985 DFG/FS cooperative goshawk study). (4) Carefully delineate and protect habitats of the Kern Canyon slender salamander, Inyo Mountains salamander, South Fork Kern River golden trout,

and Little Kern golden trout among other species known to occur on the Forest (or discovered during surveying). (5) Incorporate provisions of the "Pacific Coast Recovery Plan for the American Peregrine Falcon' and the (draft) "Pacific Stare Bald Eagle Recovery Plan" (as they relate to the Sequoia NF).

88 **4-26:** With respect ta peregrine falcons, the management direction found on page 2-62 of the DEIS states, "Five pairs of peregrine falcons will be established ...". However, on page 4-26 of the Plan, the standards and guidelines state that, "Two pairs of falcons will be established ...". This apparent conflict should be resolved.

89 **4-27:** Standards for dead-and-down log management are inadequate for maintenance of the numerous species dependent on these habitat elements. Populations of lizards, salamanders, small birds. mammals, black bears, etc., which are dependent upon dead-and-down woody material (includes logs and slash) would be diminished. A minimum of 3-4 down logs (20" x 20' or larger) per acre should be retained (100+ cubic feet). On key wildlife areas a higher number should be considered, with logs yarded to positions providing maximum effectiveness as wildlife habitat. Woody debris (slash) should also be retained on at least 10% of the timber harvest area (Please see: Ag.Handbk. 1553). Consultation with a wildlife biologist should be required on a case-by-case basis.

90 *4-27:* We believe the standard for snag management is inadequate to meet the needs of the numerous wildlife species dependent on this habitat component. Snags are used as nesting sites for primary and secondary cavity nesters. foraging habitats, singing posts, drumming sites, food caching locations, lookouts and roosting stations. Standards must be developed to address such factors as (1) hard vs. soft snag needs, (2) maintenance and management for future snags, (3) protection of snags in high use areas, and (4) distribution of retained snags (Thomas 1979). Retention of snags on a compartment basis as proposed, could lead to undesirable concentration of all snags into non-commercial areas with the majority of the commercial lands denuded of snag habitat. This intent is, in fact, stated in the propossd standard on page 2-31 of the DEIS (manage snags in "areas such as Riparian zones, Meadow Influence Zones, and Retention and Partial Retention Visual Zones, wherever possible"). It as essential that snags be retained within each harvest area in order for on-

site wildlife to be maintained in existing diversity. The following are our suggested minimum standards.

1. Retain in all forest types (within harvest units), an average of at least 2 hard snags per acre. 12" dbh or greater and 20' high or higher, plus an average of 1 hard snag per acre, 25" dbh or greater and 20' high or higner.

2. Retain all soft snags, as recommended in Ag. Eandbk. #553, page 66.

3. Plan for availability of snags over time through retention of future replacement trees.

4. Designate and protect snags and future snags for wildlife use (this is important in light of the current pressure from woodcutters on dead woody material).

91 4-27: "Key areas" for hardwood indrcator species appear to be lacking in the Hardwoods Management Standard. Hardwoods need protection over their entire distributions as a critical habitat component. Adequate retention standards need to be developed for all oak types and should specify that oaks retained be distributed throughout harvest areas.

92 4-27: The Plan is unclear who will "inventory and monitor riparian areas". The Forest Service has suffered serious reductions in those personnel qualified for such studies (fishery and wildlife biologists, and hydrologists). We recommend the riparian areas be given protection until the Forest has sufficient trained personnel to develop appropriate standards and guidelines.

93 4-27: We disagree with limiting the definition of meadows to areas 2 acres or larger in size. Meadows smaller than 2 acres are critical for wildlife (e.g., deer fawning sites) and warrant protection. Examples of important habitat now excluded under the 2-ac. definition include meadows in the Pine Flat area (T24S, R34E, 531) and at Little Horse Meadow (T20S, R34, S33).

On August 12, 1982 the Sequoia LMP Management Team approved a standard defining a meadow as 0.1 acre or larger. We recommend that this standard be retained.

94 4-27: Statements are made in this section that "small groups of trees" may be removed from the SMZ. The removal of groups of trees from the SMZ should include consideration of the effect on stream shade and water temperature.

95 4-27: Individual Soecies Comments. The Plan indicates that habitat for "about 90 pairs" of spotted owls will be maintained. The Plan fails to indicate where these pairs

are now found, where they will be maintained, how large an area of habitat will be maintained, how many pairs actually exist in the forest (Page B-3 of the Appendix only states that habitat for 140 pairs is estimated to exist), how the habitat will be maintained (other than.in accordance with an undescribed habitat capability model), if each of the pairs will be associated with a spotted Owl Management Area (SOMA), how the minimum viable population requirement of 35 Spotted Owl Territories (SOTs) was derived (other than the statement: "... 35 pairs is based on a Forest network which fnsurcs sufficient habitat for viable interaction between pairs"), what the relationship is b-tween a SOT and a SOMA, what constitutes a viable interaction, and numerous other questions which need to be answered before the viability of the spotted owls can be evaluated. On Page 4-27 of the Plan, standards and guidelines refer to habitat capability models as the basis for spotted owl management. We believe the Region 5 (USFS) guidelines for spotted owls should be reaffirmed in this section as the minimum requirements for management.

96 4-28: The standards for management of annual rangeland will result in severe impacts to wildlife. The blue-oak woodland and savannah habitat is used by a multitude of wildlife species and therefore should share use emphasis. The mulch management standard of 400 pounds of residual dry matter is inadequate tor wildlife needs and we recommend that it be raised to a minimum of 700 lbs./acre.

97 4-28: The Plan states that livestock use will increase on transitory range and forage use will be optimized to a point where "utilization may exceed normal range allowable use standards". Yet this transitory range habitat is also burdened with maintaining early successional species like deer. The proposed level of livestock use will reduce or preclude such benefits for wildlife.

98 4-28: Wet mountain meadows are key habitats for numerous wildlife. Their management under livestock standards ("fair or better condition") may protect the meadow for future livestock grazing but it allows for their continued degradation from a wildlife and fisheries perspective. Given that livestock use accounts for only 1% of the Sequoia's PNV and that recreation (which would include the public's enjoyment of meadow-associated wildlife) is documented as being of much greater importance, we recommend that livestock Should be reduced to dcnsitites consistent with protection of meadow habitat needed by fish and wildlife.

99 4-28: If grazing is permitted on mountain meadows, cattle should not be placed on meadows until they are dry enough that animals will not cause erosion damage.

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100 ~~4-28:~~ Tractor logging on a 40% slope is likely to have substantial risk of erosion. Such methods should be limited to slopes of no more than 20% in most soil types.

101 4-34 to 4-100: (Particularly 4-76 to 79). . No special prescription is provided to preserve SOTs or to enhance SOTs which presently do not meet regional guidelines for spotted owl management.

102 ~~4-38:~~ Fishing should be included in list of activities permitted (Kern River above and below Isabella Reservoir).

103 4-39 to 4-100: No significant management statements are made regarding fish. Almost all Plan and DEIS sections fail to address fishery resources.

104 ~~4-44~~: The conversion of chaparral to grass on slopes less than 10% is not necessarily beneficial to wildlife. According to the USFS Coord. Guidelrnes, wildlife benefits will not accrue unless conversions are laid out in a manner which provides retention of 50% or more of the area vithin each 40-acre or larger unit as escape and thermal cover. These retention areas should be broadly distributed. In addition, (1) openings should be no wider than 10 chains, (2) perimeters should be designed with irregular edges, and (3) retention areas should be selected to favor wildlife (USFS Coordination Guidelines). Initial layout, retention and treatment areas should be designed in consultation with wildlife biologists. If the principal intent of the proposed conversions is to increase livestock, it should be addressed under "Range., rather than 'Wildlife".

105 4-44: Because chaparral slopes less than 40% are the best wildlife habitat, we disagree with their treatment on a 40-60 year rotation cycle. Maximum rotation should be 30-40 years. A 40-60 year rotation would not allow the attainment of the desired goal of 80% of stand in 0-30 year age classes as stated on Page 4-44.

106 4-44: At least 700 pounds per acre of residual mulch should be retained on annual range.

107 4-46: Emphasis - Fishing recreation should also be addressed here.

108 4-59: Emphasis - Developed recraation areas need to be carefully located to avoid damage to forest resource values, especially where sensrtrve wildlife, plants, fzsh, fragile soils or streambanks, etc., are present.

109 4-60: Fish habitat protection has been omitted.

4-61: Timber 21 - Developed recreation areas should have an undisturbed buffer zone of adequate dimensions to afford separation of users from sensitive areas.

110 4-62: The 'Emphasis" statement for ?rescription WF4 indicates that prescribed fire will be used to maintain long term plant diversity in the wilderness. In apparent contradiction hcwever, tha fish and wildlife standard for this prescription states that no wildlife habitat improvement work will be done with prescribed fire. Suppression of natural fires has artificrally reduced wildlife habitat value in wilderness and non-wilderness areas. The Plan should acknowledge the value of both natural and planned prescribed fires to improve this condition.

111 4-63: Fish and Wildlife - Fishery resources should be included.

112 4-64, WC4: Opportunities - Wilderness plans should include provisions for specific fishery management activities.

113 4-46: Fish and Wildlife - Fishery resources and management should be included here.

114 4-65: Emphasis - Fishing has been omitted.

115 4-65: Although Prescription 806 is included in the Plan, there appears to be no acreage allocated under at. It gives the false impressions that wildlife will be emphasized and that blue oak will be regenerated, when in fact, most blue oak habitat will continue to be overgrazed under the 506 Range Prescription. For this prescription to effectively benefit wildlife, livestock use should be reduced. A mulch retention level of only 400 lbs./acre, as prescribed, as inadequate. It would continue to allow overuse of the habitat by livestock and prevent the regeneration of oaks (Bartolome et al. 1980).

116 4-66: Fish and Wildlife - Fish and amphibia are omitted here.

117 4-68: The Opportunities Section Ear OW5 states that livestock grazing is desirable except when in conflict with recreation. Significant wildlife impacts will also accrue with the grazing levels proposed. Little wildlife benefit would result.

118 4-69: The Plan does not state what would happen to snags on the remaining 90% of oak woodland habitat (with slopes less than 40%). Because this is a 'wildlife prescription'. harvest of oaks or snags should be done only where wildlife would be benefitted and through consultation with a wildlife biologist.

119 4-69: Fish and Wildlife - Fish and amphibia should also be addressed here.

120 4-10: Emphasis - Fishing cecreation should be addressed here.

121 4-71: See comment made on Page 4-68, above.

122 4-71: The Plan promises an increase in early successional stages of mixed chaparral which are important to wildlife (Page 4-7). in contrast, this "wildlife prescription" calls for only 60% of that habitat to be in the 20-30 year age class and an additional 20% in a 40+ years condition. This is inconsistent with wildlife needs since mixed chaparral has already lost much of its value to wildlife at 20+ year; of age.

123 4-71: ~~Fish~~ and Wildlife - There is no mention of fish or amphibia.

124 4-72: (Fish and wildlife Item #2) - See comments under Page 4-44.

125 4-72: Mulch retention should be a minimum of 700 lbs./acre under this "wildlife prescription".

126 4-73: Emphasis - There is no emphasis placed upon wilderness, primitive recreation, or fishing (South Fork Kern River).

127 4-14: Fish and Wildlife - There is no mention of fisheries.

128 4-75: The emphasis on livestock use in the pinyon-sage will reduce habitat value for wildlife. Consumption of annual grass-forb forage down to 400 lbs./acre will force livestock to use browse species important to wildlife (USFS Technical Report RM-47). Overall, the prescription will have little value for wildlife unless livestock use is reduced prior to conflicts with wildlife. As written, it should be more properly classified as a 'range" rather than a "wildlife".

129 4-76: The first sentence under "Opportunities" should read "Timber harvesting will be made more compatible with wildlife needs than would be accomplished under a sawtimber prescription". This change is needed because the additional "Fish and Wildlife' standards (Page 4-77-78) are not adequate to fully prevent wildlife reductions. Sucn reductions would especially occur as a result of "Timber" standards 43 and #5 (Page 4-78).

The CPS prescription is applied only to a relatively small area of the Forest (25,000 acres). Its effective protection for forest wildlife would therefore be limited.

130 4-76: Emphasis - Fishing should be included and discussed here.

131 4-77: Fish and Wildlife - There is no mention of fishery resources or amphibia.

132 4-78: "Timber": Items #3 and 45 appear in conflict with the intent of #4. *Also,* because this is a "wildlife" prescription, item #2 appears to *be* inappropriate, as stated.

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133 4-79: Wildlife habitat will not be enhanced for harvest species under the BO6 prescription. Maximum livestock use of the blue oak habitat from February to September and retention of only 400 lbs /acre of mulch will reduce wildlife habitat values ("Range" Items #1 and #2). This habitat type is important winter range for migratory deer herds as well as resident deer. Key blue oak winter range has been designated in the Greenhorn and Tule River Kerd Plans. The BO6 prescription as written would lower the carrying capacity of these key areas for deer as well as other wildlife. This would be contrary to the plans, as mutually agreed to.

134 4-82: The OW6 Prescription will not "enhance" habitat for harvest wildlife species. Encoucaging the harvest of black oak will be to the direct detriment of wildlife. The oat retention standards (Fish and Wildlife" $2 and #4) would only partially mitigate the planned losses.

135 4-82: Does Item #1 under "Fish and Wildlife" mean that oak snags will be removed from 90% of all oak woodland less than 40% slope? If so, what data is available to show that even "minimum vrable populations" of species dependent on oak snags could be maintained over tame?

136 4-85: Pinyon-sage - Management should provide many small cleared areas mixed with natural woodland. Openings should be between 100 and 600 feet wide. Slash and woody debris should be retained in the openings. Light to moderate sprang and autumn grazing of grasses by cattle is acceptable; however, no livestock grazing should occur on those lands within important deer winter ranges, as recommended in USFS Gen. Tech. Rpt. RM-47.

137 4-86: Wildlife habitat will not be enhanced for harvest species under a prescription that emphasizes winter grazing in the pinyon-sage type. Conflicts between deer and livestock are occurring now on winter range in Long Valley, Rockhouse Basin and Lamont Valley. The proposed mulch retention standard (Page 4-81, Range Item #2) is inadequate to prevent these conflicts.

138 4-88: What is the location of 8,000 acres allotted under the CF6 prescription? Is any of this acreage part of the 7,540 acres of mountain meadows referred to under the discussion of meadow habitat on Page 3-39 of the Plan? If so, we are seriously concerned with livestock grazing being the primary emphasis in meadows and with the fact that wildlife needs are not recognized in discussion of the emphasis and opportunities sections.

139 4-88: Emphasis - Meadows are key fishery resources, which are highly susceptible to the adverse effects of overgrazing. As such, meadows should not be managed to optimize livestock grazing, unless a constraint is included which prevents damage to fishery values.

140 4-90: Fish and Wildlife - There is no mention of fish or amphibia. (Range, 3) - Grazing emphasis in meadows will reduce stream habitat values.

141 4-91: The 294,000 acres included under the CF7 prescription contains much habitat that is critical to wildlife. Bowever, wildlife is not mentioned in the dascussion of opportunities within the area. The standards and guidelines are inadequate to protect wildlife under intensive silviculture. Additional standards should include:

L. Limitation on timber operations in key deer habitats (propagation areas, migration corridors, and holding areas). This includes such measures as limited operating seasons, restricted vehicle travel, restored road consttuction, etc.).

2. Retention of a vegetation screen adjacent to new timber roads.

3. Seeding of skid trails, landings, temporary roads, etc., with plant species utilized by wildlife.

4. Modification of cutting units (size and shape) within key habitats (e. g., deer population centers).

5. Development of specific release treatments within harvest units to benefit early successional wildlife species.

Without additional specific standards and guidelines for protection of these areas, wildlife will suffer significant losses under the CF7 prescription.

142 4-91 to 4-93: There is no mention of fishery resources or compliance.

143 4-94: Altered water yield would be potentially harmful to fluvial ecosystems, if it is accomplished as proposed.

144 4-96: Increasing water quantity will not "improve timing of strean-flow" and may, in fact, be detrimental.

145 4-97: Fish and Wildlife - There is no mention of fish or amphibia.

146 4-98: Timber - Please see comment P 4-94.

147 4-98: Watershed 2) - Same comment as above.

148 4-100: Opportunities - Provisions should be made for fishery management in all stream classifications, for restoration and maintenance of native fish species and restoration of damaged stream habitats (South Pork Kern River).

149 5-1: Monitoring - see general comments.

150 5-8: Proposed mcnitoring for all wildlife is non-specific. Minimum monitoring to evaluate the Forest's spatted owl management direction alone, could not be completed within the $6,000.00 allocated for all wildlife monitoring, forest-wide.

151 App. A-1: Plans should be developed for restoration and protection of Kern River rainbow trout, South Fork Kern golden trout, other native trout species, Kern Canyon slender salamander, and Breckenridge Mountain slender salamander.

152 App. B-2: Fish and Wildlife -The following should be added: "Determine effects of management activities on stream habitat and fish populations."

153 App. 8-32: The only specific reference made to the northern goshawk is in the Appendix on Page B-32. Despite the assertion here that standards and quideiines contain-necessary direction to maintain 21 nesting pairs, the Plan contains no discussion of this species. Detail is needed regarding where it may be located in the Forest, or how it will be protected. Further, due to lack of adequate surveys and nesting territory documentation, we question the validity of Forest-wide estimates of goshawk populations or the assessments of their viability. This is especially true, considering their planned reduction to 21 nesting pairs. A reliable population estimate needs to be made before such projections should be attempted. we would not concur with a planned reduction, as proposed.;

ADDENDUM 3

COMMENTS ON THE DRAFT CIS
SEQUOIA LAND AND RESOURCE MANAGEMENT PLAN

154 1- 2 Lines 14-15: Implementation of the deer herd plans is a joint venture of the Department of Fish and Game (DFG) and the sequoia National Forest (SNF). We do not believe that the herd plans could be fully implemented under any of the considered alternatives. The preferred alternative is especially incompatible with the objectives of the herd plans.

155 2- 2 Lines 36-37: The ELS should state the criteria that were applied to both priced and non-priced benefits, and how they were jointly considered.

156 2- 9 Lines 4, 11: The EIS is unclear how the benchmarks of 140 pairs of spotted owls and 110 pairs of soshawks were developed. There were only 46 known spotted owls sites when the plan was developed; and we estimate only about 75 territories for the forest.

If the estimate of 140 pairs of spotted owls was correct, how can a reduction of 75% to 35 SOMAs be considered acceptable? Row can viability be guaranteed? In addition, some SOMAs already designated may prove to be unsuitable for maintaining breeding spotted owls in the future. This uncertainty should be a consideration in selection of "viability" levels.

157 2- 9 Line 34: The units for Resident Fish are omitted. We assume they are "M pounds".

158 2-10 Lines 27-33: The assumption that resident fish populations will remain constant over the next 5 decades is unsupported. It will probably not occur unless some effort and money are expended on habitat restoration and/or enhancement, to offset land use changes and their effects upon watersheds.

159 2-16 Lines 20-30: The conclusions of the benchmark analysis show that timber sales contribute only 19% of the Forest's total PNV, and livestock grazing only 1%. It therefore appears these activities are weighted disproportionately in the plan objectives. Livestock use, in particular, as relatively insignificant in its contribution to the PNV and therefore should receive low priority where it conflicts with other resource uses.

160 2-25 Lines 1-7: The MMRs should address the regional guidelines for establisning and maintaining a SOMA matrix.

Use of the Kabitat Capability Model as applied to Spotted ovls also needs to be described in detail. (How vas the viability limit of 35 pairs of ovls derived and what assumptions were used?)

161 2-25 Lines 33-34: The document is unclear whether diversity, (i. e, 5% retention by timber/seral type) will be maintained at the forest level or at the timber compartment level.

162 2-28 Lines 28-32: Evaluation of segment 1 of the Kings River as a vild and scenic river should not be deferred. Please see also our comment 3-47 on the Plan (Addendum #1).

163 2-30 Lines 30-38: The section regarding wildlife Kabitat Relationships is important. Along vith details of Forest-vide Standards and Guidelines, it would be beneficial to include a description of what Standards and Guidelines are and how they will be used. Many readers do not have ready access to the WFKR program entitled "California Wildlife and Their Habits: Western Sierra Nevada". This section therefore fails to address the basis for management of the fi h and wildlife resources on the Forest.

164 2-31 Lines 14-18: Late successional and old-growth wildlife habitat will be reduced from levels that nov exist.

Spotted owl management areas should be established by the Regional guidelines and maintained under those standards as well as according to the habitat capability model.

165 2-31 Lines 19-30: Please see our comments on the Plan, Page 4-27.

166 2-31 Lines 31-33: Please see our comment on the Plan, Page 4-27.

167 2-32: At a minimum. the following standards and guidelines for sensitive plants should be adopted in the plan: (1) Sensitive plant species will receive special management to prevent their eventual placement on federal lists as discussed in FS Manual 2670.3. (2) The Forest will develop species mamaqement guides for sensitive plants. These guides will function as 'recovery plans" defining activity constraints in essential habitat. and the need for monitoring land allocation and habitat manipulation. (3) The Forest inventory of sensitive plants will be completed before the next round of Forest planning.

168 2-32 Lines 1-4: Please see our comment on the Plan, Page 4-27. regarding riparian areas monitoring.

169 2-32 Lines 5-7: Please see our comments on the Plan. Page 4-27.

170 2-33 Lines 1-9: The standards for management of annual rangeland will result in continued excessive use of forage and mast by livestock. The blue-oak woodland and savannah habitat is

used by a variety of wildlife species which should share the use emphasis. The mulch management standard of 400 pounds of residual dry matter is inadequate for wildlife needs and we recommend that it be raised to a minimum of 700 lbs./acre. (Bartolome 1980)

This discussion should include a standard that will prevent damage to meadows by excluding cattle from meadows in the wet season.

171 -2-33 Line?: 10-13: Please see our comments on the Plan, Page 4-28.

172 2-33 Lines 14-16: please see our comments on the Plan, Page 4-28.

173 2-33 Line 17: One of the most serious proposed changes from current forest management, is that of large scale clearcut and shelterwood harvesting. A large amount of land is scheduled to be treated under this even-aged management system (an average of 27,400 acres/decade - Table IV-16 in the DEIS). The intensity and methods that will be practiced in reforestation of the clearcut and shelterwood harvest units are critical to the resultant benefits for wildlife. The DEIS consistently iescribes improvement of early-successional species habitat that will result from the proposed even-aged management scheme. It falls, however, to state that intensive site preparation herbicide treatment and other maintenance activities as proposed, would significantly teduce wildlife and fzshery benefits. The NFXA specifically states that regenerataon cutting is to be carried out only where consistent with fish and wildlife protection. This problem should be recognized and addressed by specific standards and guidelines.

174 2-34: Forest-wide standards and guidelines permit the gathering of firewood and other forest products on all available lands. This is an example of how the preferred alternative fails to consider the specific needs of rare salamanders (i.e. the need of the Kern Canyon slender salamander for downed logs and surface litter). Minimum requirements should be identified in the plan and firewood gathering should be regulated.

With respect to the two subspecies of golden trout which occur on the Forest, the failure to provide specific management direction and prescriptions for critical habitat maintenance could result in failure to maintain viable populations. These trout are particularly vulnerable to habitat degradation. As such, activities which occur far from the actual habitat may have critically detrimental impacts. Since habitats surrounding many streams which contain golden trout (especially Monache, Soda, Snake, Fish, and Upper Trout creeks) are planned for timber management. it is vital that strict standards and enforcement be implemented to protect the watersheds. This should include standards and

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guidelines to restrict tractor logging to slopes less than 30% where erodible granitic soils occur and 35% where less erodible soils Occur, a quantitative limit for maximum cumulative disturbance, and a LOO-foot (each side) stream management zone along Class I and II streams. The plan should make provisions to provide for at least 30 miles of stream habitat restoration for existing meadow streams within the Forest which have been degraded by past bank erosion and bank sloughing.

175 2-39: we believe that. the delineation and assignment of prescriptions to entire management areas is inappropriate, based upon the NFMA requirement that they be associated with specific areas based on land capability and suitability. In the present plan there are significant habitat types which are treated simply as "inclusions" in other general vegetative categories. For example, montane chaparral brush patches are key areas for deer and other early successional wildlife. however, they are simply included in "Conifer Forest". Patches of black oak woodland that ace key areas for many species of wildlife have also been included in "Conifer Forest". Xey habitats like these must be treated based on their specific capability and importance in providing for forest benefits and values.

A good example of an important wildlife habitats that could be being impacted by the Plan's failure to acknowledge its specific identity or value is Monache Mountain, S. W. Quad Vegetative Type Map (#306-3C). The western portion (non-wilderness) of this area, comprising about 13.500 acres, is designated "Conifer Forest-Sawtimber". However, of this 13,500 acres, approximately 2,500 acres are montane chaparral, 500 acres are sagebrush, and 160 acres are meadow, all occurring in a mosaic pattern over the land. This particular area. with its diverse wildlife habitat types, would accrue significant wildlife losses if managed under a sawtimber prescriptron and the proposed, associated standards and guidelines.

176 2-41 to 2-55: There are no management prescriptions intended specifically to benefit wildlife or key wildlife habitat. All wildlife-orientehprescriptions are subordinate to other conflicting uses (such as grazing, recreation and timber production). Although wildlife prescriptions BO5, OW5, MC5, PS5 and CF5 state that grazing is desirable except where in conflict with wildlife. the Forest. in the past has not remedied such conflicts. Wildlife value is also tied to increased recreation in all of the prescriptions.

177 2-57 Lines 17-20: Two additional ski areas (along with Peppermint Mountain) will have additional effect upon wildlife, which will need to be addressed.

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178 2-58 Lines 4-13: 677,000 (170,000 usable) acres will be open to cross country O W use, except in areas closed seasonally or permanently to prevent resource damage. This will adversely affect wildlife.

179 2-59 Line 25: Evaluation of Segment 1 Kings River for wild and scenic designation should not be delayed.

180 2-62 Lines 22-27: We support the use of prescribed fire to enhance wilderness values.

181 2-62 Line 30: The statement that "the current level of fish habitat capability will be maintained" is unrealistic for the reasons outlined in the general comment section.

182 2-63 Line 1: This section states that planned levels for spotted owls and goshawks are above the MMR level. The planned level, however, is inadequate and is, in fact, 40% below the current level. This constitutes a planned management strategy to reduce the number of these species.

We question the Forest's ability to maintain habitat for 90 pairs of spotted owls considering that only half that number have been identified on the forest at present management levels. The Forest can save the prescribed amount of habitat in a cumulative total, but without distributing it in appropriately-sized tracts, spotted owl objectives would not be realized. The same is true of the goshawk.

183 2-63 Line 9: A secondary impact of concern is the need for future summer livestock range capacity.. If livestock use in the future must be increased on summer ranges in proportion to the additional planned livestock use on winter range allotments, adverse impacts on fish and wildlife could occur. These should be addressed.

184 2-63 Line 16: Emphasis on use of logging slash and dead/down material for fuelwood will directly reduce wildlife habitat diversity. The retention standards as presented are substantially lower than those recommended in Ag. Randbk. #553.

185 2-64 Lines 6-9: We recommend provision for a 100' wide buffer zone on each side of all perennial streams. We believe that this will be needed to meet the intent of NFMA regulations,

186 2-65 Line 27: Plant age composition will be shifted within the treated chaparral stands, however, vegetative species diversity within the conifer zone stands will likely decrease in the long term. Wildlife diversity will be coincidentally reduced through the planned reduction of old-growth stands, oaks, snags, dead and down and other key wildlife habitat components.

187 2-66 Line 14: We believe it is undesirable to eliminate small, under-utilized campsites in the water-oriented areas and expand heavily used sites. Such an action could concentrate resource damage.

188 2-66: The PRF Alternative proposes no blue oak lands within the wildlife/recreation prescription (B05). Continued allocation of blue oak habitat to maximum livestock use as proposed will cause continued degradation, poor regeneration and a reductior in population levels of the numerous dependent wildlife species (including deer, quail, woodpeckers, small mammals, etc.).

189 2-68 Line 33: We disagree that deer numbers would increase from 11.000 to 15,000 over the planning period under the preferred alternative. Greatly increased levels of recreation use, livestock grazing, intensive timber harvest and the reduction in oaks will all tend to reduce deer numbers.

190 2-68 Line-34: We believe the projection of 90 pairs of spotted owls after 50 years under this alternative is too speculative. Information is unavailable for 50% of the spotted owls that exist today. None of the alternatives appear to provide for the proper mix of habitat variables needed for this species.

191 2-68 Line 36: No substantiation is presented for the assumption that the number of pounds of resident fish will remain unchanged under the PRF alternative.

192 2-69 Line 10: Table 2-6, WFUD's, Direct Rabitat Improvement for resident fish: No plans are presented for "direct habitat improvement". We are doubtful that the stated goals for fisheries could be met without such measures.

The method of estimating future use (28 MWFUD) under Indirect Eabitat Improvement should be disclosed.

193 2-69 and 2-70: The output table relating to habitat improvement through burning is confusins and does not indicate which species actually benefit from manipulation efforts. Prescribed burning outputs are predicted under "Wildlife and Fish Direct Habitat Improvement", "Range Betterment" and "Range, Wildlife, and Watershed" fire treatment. Do the acreage values for these categories overlap? Will additional livestock use be allowed on all burned areas? AUMs increase from 63.000 to 71,000 in the first decade, but no "Range Betterment" is proposed. Will this additional use occur on the same 10,000 acres proposed for treatment under "Direct Habitat Improvement" for deer? These questions need to be clearly answered in order to address actual wildlife benefits.

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194 2-75 Line 20: The statement "Average distance from stream given special treatment is 50 feet", needs to be clarified.

195 2-79 Line 36: Resident fish are projected to maintain the 77,000 pound level on the Forest over the 5 decade period wider the CUR alternative. This is unrealistic without an aggressive management and habitat restoration program.

196 2-86 Line 30: We believe that the RPA goals in regard to resident fish are: (1) manage resident fish habitat at 80% or more of potential, (2) by 1995 provide for increased resident fish habitat capabilities, and (3) increase RPA managemen indicator species, resident trout by 20%. If this is a correct assessment, how does the described element comply with RPA goals?

197 2-87 Line : Alternative methods of cattle grazing such as rest rotation should also be considered.

198 2-93: Based on our understanding of the 1980 RPA guidelines, regarding resident fish management, Table 2-10 is inaccurate. The table indicates that only 3 miles of stream would receive direct habitat improvement (see comments for Pages 2-86).

199 2-95: The theme of the "Amenity Emphasis" Alternative states that "non-market resources receive first priority". Yet, developed recreation significantly increases, spotted owls, goshawks and other mature forest species have planned reductions, grazing levels stay essentially the same (<10% decline) and oaks, snags and dead/down wood are reduced throughout timber harvest zones. These apparent conflicts need to be resolved.

From a wildlife perspective, all of the alternatives represent planned reductions with which we cannot concur.

200 2-100: Emphasizing native fish is important and should be part of the preferred alternative.

201 2-107: AUM's are reduced less than 10% by eliminating summer cattle use in meadows (as stated on Page 2-103). Given the importance of meadows to the Forest's fish and wildlife resources, it appears that more consideration should be given to the allocation of meadows to fish and wildlife in the Preferred Alternative7

202 2-108: The annual reduction of natural fuels on 4,000 to 5,000 acres will have significant impacts on wildlife. Dead and down material is an obligate habitat to numerous species including lizards, salamanders, shrews. chipmunks and black bears (Ag. Eandbk. #553). Given the inadequate standard for protection of dead and down material, as proposed in the Plan (please see our comments on the Plan, Page 4-27), long-term reduction in animal species composition would occur. This loss should be addressed in the EIS Environmental Consequences section.

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203 2-109, 2-123, **2-134**, 2-146, and 2-158: We have not provided detailed comments on the CED, LBU, MKT, PRO or WLI Alternatives **as** we consider them to be entirely unacceptable from a wildlife standpaint.

204 **2-171:** The WFV Alternative emphasizes fish and wildlife to the extent it is associated with recreation (i.e., harvest species). This alternative includes some improvements for wildlife but also has some **major** problems and inconsistencies.

1. The Piute Mountains and Scodies provide some of the poorer wildlife habitat on the Sequoia. Why weren't some of the more northern parts (better wildlife habitat) of the Forest designated for maintenance of maximum wildlife habitat?

2. **Developed and dispersed recreational activities** are **proposed** to **greatly increase These activities** can **conflict with management for fish and wildlife.**

3. **The acreage goal of habitat to be improved for wildlife appears to be unattainable, based on the past history of the Forest's ability to treat land. Prescribed burning will have to be pursued much more aggressively if the planned objectives are to be met. Funding constraints may prevent this.**

4. The proposed snag, dead/down, and oak standards will lead to reductions of existing wildlife.

5. Old-growth indicator species face substantial planned reductions in their populations in the Plan.

6. The construction of additional roads and trails for houndsmen will not benefit fish and wildlife. **As** such, they should not be included **as** benefits under the 'Program Direction" section for wildlife and fish (Page 2-176).

7. We note that some timber harvest in riparian zones is still planned. (Page 2-1791.

8. While reductions in the amount of grazing use and the length of the allowed grazing season on meadows and annual grass are helpful, they are still insufficient to maintain wildlife populations at or near present levels. (For example, grazing of the annual range as early as February 15 results in wildlife/cattle competition). We also note that actual output of Forest AUMs is proposed to increase over the planning period by 13% (and over the 1979 level by 60%). It is highly unlikely that wildlife will benefit by reduction of available forage and cover.

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9. Planned fuelwood (non-sawtimber) use is increased by 80% over the planning period. This production of firewood is proposed as a by-product of wildlife habitat projects. We believe the planned additional harvest of oak trees will result in overall adverse impacts to wildlife.

205 2-175 & 176: The WPV *does* not really support the full range of wildlife species. Over 90% of the bird and mammal species in California are not harvested. To direct emphasis towards less than 103 of the species (harvest species), to the detriment of others is not an acceptable goal for the wildlife alternative.

206 2-209: All of the various alternatives call for decreases from 5% to 45% of the habitat for species associated with late successional stages. This is not an adequate range of alternatives.

207 3-50 Line 12: The conclusion that there is "... no opportunity for significant improvement in fish production" is incorrect. There are many techniques which could contribute to increase production of resident fish. They require manpower and money, however, along with a commitment to see this resource improved.

208 3-51: The statement that "native fishes in these areas are badly depressed due to heavy fishing pressure, competition with hatchery rainbows ..." is not adequately supported. In many cases, hatchery rainbow trout do not compete well with resident fish and have a comparatively short life expectancy. (There is a problem, however, in some areas of extremely heavy fishing pressure where the resident trout populations were reduced prior to the stocking of catchable-sized trout).

209 We have no way of knowing whether the estimated 46 miles of stream that is categorized as "benefitting from habitat repair" is accurate. It must also be recognized that over the next 50-year period, under the activities of the Preferred alternative, the mileage of stream requiring habitat repair will increase.

210 *3-53:* The classification of the following species should be revised in Table 3.15 (and all other places where the errors appear). Kern Canyon slender salamanders are state threatened, not rare. Tehachapi slender salamanders are state threatened, not rare. Great gray owls are state endangered, not sensitive. Wolverines are state threatened, not rare. Sierra Nevada red fox are state threatened, not sensitive.

211 3-54 Line 6: How is the 470.000 acres of mature and overmature timber distributed? Is that distribution consistent with the habitat needs of old growth wildlife associates? There is only 3,648 acres of actual old growth timber available to

wildlife. This will not support the numbers of old-growth dependent species called for in the Plan, such as 140 pairs of spotted owls.

It is important to note that old-growth-associated wildlife tend to be obligated to that habitat type, while species found in early-successional stages tend to be more generalized in their habitat requirements.

212 3-54 Line 37: The statement that hunting use is expected to remain about the same is unsupported. The deer herd plans call for increasing deer numbers, and substantially increasing deer hunting opportunities.

213 3-55: what was the criteria used to categorize "high", "moderate" and "low" quality habitat for the species listed in Table 3.167

Impact assessment regarding indicator species requires knowledge of their population levels and distribution. This information should be disclosed to reviewers.

This is especially true regarding sensitive species. For example, 106,300 acres may not support any spotted owls if it is distributed in a disjunct configuration with no areas of adequate size.

214 3-57: The DEIS should also list Placelia nashiana, Calochortus striatus, Carex tompkinsii, and Mimulus pictus as sensitive plant ~species.

we could find no standards and guidelines which address the issue of the size of areas managed for rare species.

215 3-65 to 67: what is the effect of "pest" management on other species, especially those that are "indicator species"?

216 3-75: There is no discussion of resource "trade-offs" associated with the proposed additional AUM production. This should be further discussed in the EIS.

217 3-76: We question the DEIS statement that there has only been a 7% increase in AUMs since 1973. The Sequoia's 1980 "Planning Issues" document states that there were only 44,700 AUMs of use on the Forest at that time. This indicates a 41% increase in AUMs between then and the 1982 base year level of 63,000. On the Hume District alone, there has been approximately a 100% AUM increase (from 4,500 to 9,000). Given the increased AUH levels proposed in the plan, and the conflict between livestock and fish and wildlife resources, the relationship between past and present range use should be clarified for the public, along wrth related trends in availability and quality of wildlife habitat.

218 3-92 to 3-96: We believe that placing all of the Resource Natural (Study) Areas in Wilderness is inappropriate. Results from such study areas will be biased by protective management and will not provide true benchmark values for broad application. RNAs should be placed within or adjacent to areas experiencing a full range of impacts associated with timber, grazing and recreation.

22.9 3-94: The six botanical areas identified for significant diversity and essential habitat for sensitive and rare plant species should be established and management guidelines prepared.

220 3-102 Line 6: Removal of "whitewoods" could reduce overhead cover such that surface evaporation will reduce growth and survivability of the redwoods.

221 3-102: There are many meadows on the Forest of less than 2 acres in size. These smaller openings and stringer-type meadows are some of the most important wildlife habitats available. If not excessively grazed by livestock, they provide excellent deer fawning sites. We believe they should be treat-d equally with larger meadows.

222 3-106: The current plan for riparian protection appears not to conform with the intent of NFMA 136 CFR 219.13(e)], Forest Service Manual Direction for Riparian Protection (Title 2526.03) and Land Management Planning Direction (Sec. 3-8 B and 4 G). The DEIS clearly shows that conflicts between riparian needs and other resource uses now occur (Page 3-106). but none of the Alternatives provide standards and guidelines, management area direction, or prescriptions that adequately emphasize riparian dependent resources.

223 3-113: Clearcutting will not favor deer if (1) intensive release treatment is done to reduce shrub competition with planted conifers (as described on Pages 3-111), and (2) livestock use during early plantation stages is emphasized (as is proposed under Section F, Pages 4-28 of the Forest Plan). Standards and guidelines that effectively retain early-seral-stage vegetation must be incorporated into the plan in order for deer and other early-seral-stage dependent wildlife to be favored. The DEIS description of the wildlife values associated with the planned clearcutting is misleading.

224 3-114: Harvest and thinning of black oak woodland may increase grazing opportunities, but we disagree that it would increase diversity of wildlife habitat over the life of the Forest Plan. See comments under the Plan, Page 3-42.

225 3-115: The lack of blue oak regeneration is briefly mentioned in the "Affect Environment" section and is partially attributed to intensive livestock grazing; We believe grazing is the major influence. Despite this conflict, the PFR alternative proposes to greatly increase livestock use of the blue oak woodland by allocating the majority to the "Range"

prescription. None is planned for wildlife emphasis. Adequate Standards and Guidelines must be developed to guarantee adequate regeneration of this key wildlife habitat. This is necessary to avoid reduction in the biotic diversity of the Forest.

226 3-115: Table 2.5 on Page 2-67 lists 43,000 acres of blue oak woodland. In apparent conflict, it is stated here that only 16,539 acres of this type exist on the Forest.

227 3-115: The description of the importance of live oak woodland to wildlife diversity is in error. Live oak trees provide food and cover to numerous species of game and nongame animals. Their acorns are particularly high in fat (energy) content (3 times that found in blue or valley oak) and are therefore of significant value. Treatment of the live oak woodland in the Standards and Guidelines is inadequate to assure their availability.

228 4-44: While it may be partly true that the southern Sierra is rugged, with granitic soils, it is inaccurate to state that this "precludes any major opportunity to physically improve the fishery habitat for native fish species". It is possible to improve fishery habitat through numerous techniques.

In some instances, the fishery habitat has deteriorated due to natural causes while in others, man's activities have been the cause. Streams such as Bearskin, Woodward, and Tenmile creeks contain large quantities of sediment which adversely impacts trout habitat. Projects to improve these habitats and remedy soil erosion problems should be considered.

It is misleading to imply (in the last sentence of paragraph 2), that better truck access to more streams would enable CDFG to stock hatchery fish in more locations. DFG is now supplying hatchery trout at our maximum capacity. Consequently, it would be difficult to stock trout in additional waters without reducing the allotment at existing stocking localities.

229 4-45: The summaries of impacts on Forest fishery resources under alternatives PRF, CED, CUR. etc., are inaccurate. The "minimum management requirement" includes adequate SMZs and use of Best Management Practices, however, (while providing some protection for the riparian resources), no provisions are made for correcting problem situations. It is important to recognize that future land manipulations, no matter how well planned, will have some adverse impact on streams and associated aquatic resources and will require corrective work.

It is incorrect to assume that trout population regulation will remain unchanged under the scenarios outlined in the various alternatives. Because habitat quality will

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deteriorate and angler access and pressure will increase, it is unreasonable to assume that over the next 5 decades "native trout production will remain constant".

230 4-46: We disagree with the analysis of wildlife habitat changes as presented in Table 4.20. Our major concerns are:

1. The increases in early successional stage habitat with all alternatives (except LSU) will not accrue unless additional standards and guidelines are developed to specifically guide release treatmcnts. The proposed plan provides no such guidance. Rather, it makes clear (Page 4-93 of the Plan), (1) that all methods of regeneration treatment to promote timber growth are appropriate, and (2) that control of competing vegetation will be done to promote optimum timber growing conditions. In addition, the proposed intense use of livestock to reduce competing vegetation in timber stands (Page 4-28 and 4-92 in the Plan) will further reduce herbaceous or shrub wildlife food and cover.

2. The impacts to late-successional stage wildlife are underestimated in all the alternatives. In the PRF alternative, 134,000 acres of mature forest will be turned into young stands, ranging from 1-50 years in age. These provide little or no benefit to old-growth species. The fact that other stands within designated wilderness, recreation areas and other sites not proposed for harvest will become older will not mitigate the loss of old growth on the Forest.

3. There are no firm standards or guidelines within the proposed Plan to ensure additional protection within riparian zones. The increases in riparian habitat capability are unsupported at tnis time.

4. Natural snag densities will be greatly reduced on 134,000 acres under the PRF alternative. The retention of snags on non-harvest areas will not mitigate this loss. Snag (and dead/down)-dependent species will suffer greater losses than those shown in Table 4.20. The projected increases seen under the RPA, AMN and NFV alternatives appear Unsupported. For example, the additional snag retention under the RPA alternative is credited with a 10% increase in snag-dependent species. We question how the retention of snags on non-harvested lands (where snags already occur) and the loss of snags on the 92,000 acres proposed for intensive clearcut management under this alternative, could cumulatively enhance snag habitat potential by 10%.

5. The level of impact to oak-associated wildlife is also understated within all the alternatives. Losses much greater than those reported in Table 4.20 will accrue

even with the oak retention standards proposed, due to: (a) loss of black oak under clearcutting management, (b) live oak and black oak harvest for fuelwood, and (c) continued loss of hlue oak through failure to regenerate stands during the planning period. Tne PRF alternacivu (Page 4-47) reports an expected 25% decline in habitat capability over 134,000 harvested acres, with yet only a 5% reduction on the Forest, overall. We doubt that sufficient opportunity exists to increase oak habitat on non-harvested lands to the extent that it would compensate for the major losses anticipated.

231 4-65: There is no mention of fishing under the preferred alternative, even though there will be a projected 75,000 to 82.000 WFUDs on the Forest by 19901

232 4-94: The environmental consequences to wildlife from the proposed "optimized" livestock use of meadows is not addressed. neadows on the Forest are already severely overgrazed, with associated losses of wildlife value. To perpetuate their "close cropped appearance" (as described on Page 2-77) ignores the needs of wildlife resources.

233 4-95: There is no discussion in this section of the environmental consequences to fish and wildlife of continued high levels of livestock grazing in riparian zones. Major conflicts are already occurring which should have been addressed for public review.

234 4-96: Riparian management as proposed in the PRF alternative may maintain indigenous wildlife at "minimum viable" population objectives set by the Forest Service, however, continued timber harvest and increased livestock use will reduce the value of riparian areas to riparian-obligate.

235 App. ~~0-7~~: Management areas are defined as "units of a single vegetative type" which are allocated to the same management emphasis. Yet, in the same paragraph, it is stated that the designated areas "may contain several vegetative types but all types within an area are managed with the same emphasis". As discussed in our comments under Page 2-39, we believe the inclusion of significantly different vegetative types within management areas implies inadequate management of specific and important habitat types.

236 B-32: Field surveys for spotted owls appear to be inadequate for the detailed assumptions and conclusions stated in the Plan.

Where are the 35 SOTs located? The document implies that they have been located, however, the data is not provided.

237 App. B-32: A clear explanation of maintaining "viable" populations should be provided. This direction appears to call for maintenance of fish and wildlife at a threshhold between stable population levels and non-viable threatened status.

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We disagree with this approach and believe that the maintenance of fish and wildlife populations at a level equal to or greater than present levels of abundance, diversity and composition is in the best public interest.

The Resources Agency of California

- Fish and Game

Resolution:

1. Please refer to Chapter 5 of the Final Environmental Impact Statement where we credit Rod Goss with his two and a half years of participation in the early stages of the preparation of the Plan and EIS. After Mr. Goss left, the Forest has had several meetings with the California Department of Fish and Game (CDFG or Department) Region 4 staff to discuss and resolve comments they had formulated in respect to the Sequoia National Forest's DEIS and Draft Land Management Plan.

2. We believe the Forest has made substantial changes in the FEIS and Final Plan which address the concerns of the CDFG in respect to fish and wildlife habitat management. Specific changes and resolutions to the CDFG comments are addressed later in this response.

3. We agree the Forest Plan and EIS have more text devoted to timber, rangeland, and recreation management than wildlife habitat management. This is so because the impacts of these programs are greatest to all resources on the Forest and, therefore, necessitate more explanation. The Forest took into consideration all aspects of fish and wildlife resources and the potential impacts to these resources when describing and assessing the effects of our timber, range, and recreation management programs.

4. There are many areas on the Forest outside wilderness where wildlife and fish resources are identified as the dominant allocation of land management uses. Over 50,000 acres of land has been identified as spotted owl habitat. This acreage has been divided into areas of 1,650 acres for a total of 30 habitat areas (outside wilderness) devoted to the protection of mature timber stands for spotted owl habitat. To the extent possible. these areas have incorporated primarily old-growth habitat which may be utilized by a variety of old-growth-dependent species.

   There are three Research Natural Areas recommended to the Chief for establishment, and five Special Interest Botanical Areas are established in the Final Plan.

   Our Forest Riparian Standards and Guidelines provide for the protection and maintenance of riparian habitat resources over all other land uses. These guidelines affect thousands of acres of valuable riparian habitat on the Forest.

   Our documents also describe the establishment of wildlife clumps or aggregations of mature timber which will be established everywhere where even-age timber management is practiced. These areas will provide protection to hardwoods, dead and down material, and soft and hard snags. Combined with the early

successional environment created in our harvest units, the affected areas, as a whole, will provide a range of vegetative diversity.

5. The CNDDB has been utilized in the preparation of our Forest Plan. Currently, we receive an annual update of all plant taxa occurring on Sequoia NF. We have been sending data to the CNDDB since its creation, and it is Forest Service direction to continually provide the CNDDB with all occurrences of plant and animal survey reports and forms as they are generated.

6. We disagree with the Department's comment that their recommendations, personnel, or expertise is not reflected in our documents. Many of the CDFG recommendations were taken into consideration and resulted in changes in the document text from the Draft to Final Plan and EIS. These changes are noted in the following pages of this response.

7. The Forest believes the Land Management Plan and EIS provide adequate protection to all geographically rare plant and animal species found on the Forest while providing for diversity.

8. The Department is correct in stating the treatment of rare plants is not discussed in each alternative described in the EIS. It was the intent of the Forest to not discuss, in each alternative. Standards and Guidelines that were common to all alternatives. Such is the case concerning the management or protection of rare plants. Chapter 4 of the Final Plan describes the Forest-wide Standards and Guidelines for all resources on the Forest. The management guidelines for sensitive plants are contained within this section. Regardless of the alternative discussed or selected, these guidelines will apply.

   Also, in Chapter 3 of the Plan. direction is provided allowing for the protection of all sensitive plant species known to occur on the Forest until species management guides are written for them.

   The text the Department refers to on page 4-50 of the DEIS has been revised to state "Known populations of sensitive plants and their essential habitats will be protected under all alternatives."

9. We do not agree with the Department that our Draft or our Final Plan fails to protect and maintain fish and wildlife resources on the Forest.

   Our timber management program will maintain wildlife resources dependent on early successional vegetation in the conifer zone and assist in providing funds for fish and wildlife habitat improvement projects and road closures. Our chaparral prescribed burn program will maintain diversity integrity in the chaparral ecosystem. Our spotted owl management program, wildlife clump policies, and Riparian Standards and Guidelines will maintain and protect old-growth and riparian habitat. Our active meadow

restoration program will improve fishery habitat and valuable meadow ecosystems. Our law enforcement program will assist in apprehending violators damaging fish and wildlife habitats. Following our management plans for species such as the Little Kern golden trout and peregrine falcon, we will eventually restore these species to portions of their original range. We have also strengthened our Standards and Guidelines in the Final Plan and EIS, providing for the maintenance and protection of important habitat types, including snags, hardwoods, and old-growth stands.

10. The statement the Department refers to, "Other than implementation of the Little Kern Golden Trout Management Plan, no other direct fisheries habitat improvement is planned..." was in error on the part of the Forest and has been changed in the text.

The Forest has identified several direct fisheries habitat improvement opportunities in Chapter 3 of the Plan which are ongoing or proposed projects. Some of these fisheries habitat projects include streambank statilization and revegetation work, installation of stream structures to improve pool/riffle ratios, and creating new fishing reservoirs to provide additional fishing habitat where practical. The Forest will continue to accomplish direct fisheries projects in the future, utilizing Forest Service and State Cooperative Funds when available. Please see the expanded section describing the fisheries situation and proposed management in Chapter 3 of the Final Plan for more details.

11. The Forest has included the use of its Forest Riparian Standards and Guidelines in the Forest-wide Goals in Chapter 4. These Standards and Guidelines address both water temperatures and sedimentation in the prescriptions developed for determining what activities are acceptable in riparian areas.

12. Please refer to Responses 10 and 11 for an explanation to this comment.

13. The Forest believes that by adherence to Best Management Practice and the Riparian Standards and Guidelines, and continued direct fisheries habitat improvement work (funds permitting) we can achieve these goals by 1995. Also, the Forest is not increasing grazing use. Livestock numbers will remain approximately at "current 1987 levels" through the next decade.

14. See Appendix L for an explanation of the budgetary process in effect on the Forest.

15. The statement the Department refers to is correct for all resources with the exception of fish levels. The Forest plans to maintain current levels of resident fish, which is 84 pereent of the 1995 projections.

16. Refer to #10 describing the changes made to the fisheries section.

17. The Forest believes it can maintain fish production at current levels by the proper use of Best Management Practices, the Forest Riparian Standards and Guidelines, and through indirect and direct fisheries habitat programs such as the Meadow Restoration Program and streambank stabilization projects.

18. The National Forest Management Act requires that this Plan shall "provide for multiple use and sustained yield of goods and services from the Forest in a way that maximizes long-term net public benefits in an environmentally sound manner." This direction precludes the Department's suggestion that the Kern Plateau be managed principally for fishery, wildlife, and recreation resource values. Also, approximately 50 percent of the Kern Plateau is already in wilderness, providing mainly fishery, wildlife, and recreation resource values.

19. Please refer to Response 4 for an explanation to this comment pertaining to the allocation of areas specifically for wildlife.

20. Please refer to our revised list of listed species in Chapter 3 of the Final Plan. Also refer to our revised Standards and Guidelines as they relate to listed species in Chapter 4 of the Final Plan. The Forest cannot ascertain whether our goals meet or exceed the recovery objectives established for many of the species listed in Chapter 3 of the Plan since recovery plans have not been written describing those objectives. We believe we meet the intent of FS Manual 2672.31 and 2672.32. The Forest would be willing to review any recovery plans the Department has written for those listed species found on Sequoia National Forest.

21. Please refer to the Forest-wide Standards and Guidelines in Chapter 4 as they pertain to Diversity. The second guideline states "Provide for an array of early and late successional stages over time in each Forest Ecosystem to assure that long-term viability of Forest wildlife species will be maintained."

22. The Forest believes it has, in the Final Plan, described a balanced program providing economic outputs and non-economic outputs such as wilderness values, dispersed recreation, wildlife resources, and cultural resource protection.

23. The Final Plan in Chapter 4 describes many Standards and Guidelines designed specifically for the protection and maintenance of fish and wildlife habitat. In particular, the Standards and Guidelines focus on critical habitat for wildlife species that utilize riparian. hardwood, snags, and down-log habitats.

The Final Plan has been extensively changed to include both even- and uneven-aged timber management systems.

24. Please refer to Response 20 which responds to this similar comment. We believe the Department's concern is the completion of recovery plans for all listed species which is also a desirable

goal of the Forest Service. We do not believe the Plan is the format in which to write these recovery plans.

25. Please see revision of selected Management Indicator Species and expanded explanation of why these species were chosen in Chapter 3 of the Final Plan. In particular, notice the substitution of rainbow trout for raccoon as an MIS for riparian habitats. Also, see the expanded monitoring (Chapter 5 of the Final Plan), describing what standards of comparison and variability from the current situation will lead to further'action.

26. For planning purposes, the Forest has no reason to assume that the majority of species present on the Forest are not of sufficient numbers and distributions to insure viability over time. Past activities have affected a relatively small proportion of the total Forest. For species in which viability is a concern, numbers of reproductive individuals have been considered and documented. These species include the California condor, peregrine falcon, Little Kern golden trout, bald eagle, and spotted owls. All of these species either have specific management plans written for them, or are given special consideration in the Final Plan and EIS. Due to the large amount of conifer forest over 130 years old on Sequoia NF (see Chapter 3 of the FEIS), viability of the goshawk, pileated woodpecker, and other species dependent on mature forest stands are considered at this time to be of sufficient numbers and distribution to insure viability.

27. The concept of minimum viable population maintenance has been dropped from the documents. We are managing for the maintenance of viable populations of all species.

28. Our standards, guidelines, and goals for fish and wildlife apply to <u>all</u> species present on the Forest. Please review our revised goals, standards, and guidelines addressing fish, wildlife, and their associated habitats on the Forest in Chapter 4 of the Final Plan.

The goals, standards, and guidelines provide for the protection of the species and their habitat for all the species listed in Table 3.15 under all alternatives, so a separate analysis of the effects to all listed species is not necessary. In Chapter 4 of the FEIS. an analysis is provided of the expected percent changes the Forest anticipates from management activities to specific habitat types including riparian and old growth habitats.

29. The South Fork Kern golden trout and Inyo Mountains salamander have not been listed as sensitive by the Regional Forester at this time. The Sierra red fox has been added to Table 3.15.

30. The majority of inventorying for specific species will occur at the project level when environmental assessments are developed. Please see revisions to Appendix B of the Final Plan for expanded text on Research Needs.

31. Please see Response 26 for an explanation to this comment.

32. The Forest has recently hired a shared-services Fisheries Biologist, a Zone Wildlife Biologist, a Hydrologist, and a Soil Scientist. These persons, and a variety of other resource specialists, will accomplish the monitoring described in the Final Plan. In addition, as the state agency responsible for wildlife in California, the Sequoia NF will be relying heavily on the monitoring, inventories, population studies, and other research your Department has and will continue to accomplish.

33. The Forest is confident the revised Final Plan and EIS captures and responds to the majority of concerns expressed by the California Department of Fish and Game in a responsive, favorable nature.

Following are the responses to specific comments brought up by the Department regarding the Draft Plan and EIS.

Addendum 2.

Resolution:

On August 18, 1986 a meeting was held between the California Department of Fish and Game and Sequoia National Forest representatives. In attendance were Rod Goss and Dale Mitchel from the CDFG, and Ken Anderson, Steve Anderson, Warren Starnes. and Gordon Heebner from the Sequoia NF. The purpose of the meeting was to come to resolution on the comments the CDFG had formulated in respect to Sequoia National Forest's DEIS and Draft Land Management Plan. The comments and resolutions are printed in this document. Note that although agreement or resolution could not be met on every comment, both agencies felt the meeting was very beneficial.

34. Refer to the revised Vision Statement in Chapter 1 of the Final Plan for inclusion of wildlife habitat management.

35. Refer to the revised text concerning sediments in Chapter 2 of the Final Plan.

36. A. Spotted owl habitat areas have been included in the map package. A description for some of the T&E wildlife species is found in Chapter 3 of the Final Plan. Other details for T&E wildlife species management are contained in Appendix B of the FEIS, and in specific management plans for the species.

B. Refer to Chapter 2 of the Final Plan for reference to key habitat management for deer herds. Also see Response 3 for further explanation to this comment.

C. Refer to the revised fisheries section in Chapter 3 of the Final Plan for an outline of fisheries maintenance and

enhancement opportunities taking place on the Forest. The Forest believes it is actively engaged in sufficient direct and indirect fisheries habitat management to maintain existing number of fish on the Forest.

D. The Department and Forest Service representatives agreed this comment was based on opinion and, therefore, no response was formulated. In addition, the Forest does not plan to increase grazing, at least through the first planning period.

E. Although the CDFG and the Sequoia NF agreed this comment was an opinion and, therefore, not substantive enough for a response, a couple of points of clarification should be made.

No entire wildlife habitat will be lost. Some habitats, such as old-growth, will decrease, while early successional conifer habitats will increase.

Grazing is not planned to increase above current levels. FORPLAN modeling outputs indicate there will be an increase in available forage, primarily transitory range increases, created through timber harvest activities. The Forest does not plan to increase cattle numbers to take advantage of this forage. The Forest plans to maintain current levels of grazing. The additional forage will be available for wildlife, lessen the grazing pressure on meadows and riparian areas, and provide additional forage for recreational stock which is increasing on the Forest.

The revised Standards and Guidelines provide increased protection and maintenance of oaks, snags, and downed logs from what currently exists.

37. Currently, a comprehensive road closure plan for the Sequoia NF does not exist. An expanded explanation of road closures and policy is found in Chapter 3 of the FEIS under Facilities.

38. See response to 36.E for a discussion of grazing on the Forest for an explanation to this comment.

39. We have included references to Best Management Practices and the Forest Riparian Standards and Guidelines in this section. We have also revised the wording to clarify the answers on SMZ management.

40. The section on diversity has been expanded in Chapter 3 of the Final Plan. Also, see responses to Addendum 1, Responses 1-33, for additional information concerning diversity.

41. The section on the importance of firewood has been revised in Chapter 3 of the Final Plan.

42. The section on the value of commodities has been revised in Chapter 3 of the Final Plan.

43. The text referring to Sacramento perch has been revised in Chapter 3 of the Final Plan.

44. Stream survey documents are available on the Forest for your review.

45. The text describing the Fisheries Resources and Opportunities on the Forest has been revised in Chapter 3 of the Final Plan. These revisions concerning opportunities for fish habitat improvement on the Forest have been changed from "no opportunity" to "many opportunities" which are described in the text.

46. The text describing existing conditions for spotted owls, goshawks, etc., that you refer to has been extensively revised and expanded, describing some of the future conditions and current and future trends for some of the animals.

Also, refer to Response 45 for further explanation.

47. See revisions to the Fisheries section in Chapter 3 of the Final Plan regarding your comments about fish and fisheries habitat.

4a. See Response 47 for an explanation to your comment.

49. The Forest is not aware of these species as being listed.

50. The text was not revised to reflect the Department's concern about WFUD estimates. The Forest computed WFUD numbers based on a small percent of actual Forest visitor time spent hunting and fishing. Therefore, total days spent on the Forest are not an accurate measure of time spent on wildlife-related activities.

51. The Forest is of the understanding the number of deer tags sold is declining rapidly across the state.

52. The 44,700 figure quoted is Animal Months ***(AM's)***. If this figure is converted to Animal Unit Months (AUM's) the 1979 level was 59,000 AUM's. Current grazing level is approximately 69,000 AUM's for term permits.

53. The Peppermint Ski Area is the only formally proposed ski area development on the Sequoia NF. Please refer to the completed EIS for that project for information on the environmental effects of this proposed project.

54. The original statement on page 3-19 has been revised to state "Future wildlife demand is expected to increase based upon projected population growth."

55. Riparian areas, as described in Chapter 3 of the Final Plan, are adequate and no change was made based on this comment.

56. Reference was made to the Forest Riparian Guidelines which are available for review. These guidelines specifically outline

management prescriptions developed when activities take place in or near riparian areas.

57. The management direction prescribing the retention of 20-25 square feet basal area per acre is the result of previous negotiations between the U.S. Forest Service and the California Department of Fish and Game. Since the original standard was five square feet basal area per acre, the new standard greatly increases the retention of hardwoods. Therefore, no change was made to the text based on this comment.

58. The text was changed to indicate blue oak woodland is valuable wildlife habitat in Chapter 3 of the Final Plan.

59. The statement "Wildlife habitat is also reduced significantly as compared to blue and black oak woodlands" has been revised to read "Wildlife habitat is also slightly reduced as compared to the blue and black *oak* woodlands." The statement can be found in the Vegetation Management section of Chapter 3 of the Final Plan.

60. Refer to the Wild and Scenic Rivers section of Chapter 3 of the Final Plan, describing the legislative action that has taken place relating to the Kings and Kern Rivers.

61. Refer to Response 60.

62. Your recommendation that "the designation and management of wilderness areas should contain provisions for management of native fish species (chemical treatment, barrier construction, habitat improvement, etc.)" would require leglslative action and is outside the scope of this document.

63. Refer to Responses 9 and 10 for an explanation to this comment.

64. The wildlife and range Forest goals in Chapter 4 of the Final Plan have been revised to provide an improved blend of these resources and their management. Also refer to Response 36 for further explanation.

65. The entire concept of optimization as it relates to range management has been revised. Refer to the Range Goals and Standards and Guidelines in Chapter 4 of the Final Plan.

66. Refer to Responses 4, 9, and 13 for an explanation to this comment concerning timber offerings on the Forest.

67. Refer to Responses 4, 9, 10, and 13 for an explantion to this comment concerning maintenance of fish populations.

68. The statement the Department refers to in Chapter 4 of the Draft Plan has been revised as follows "Species associated with late successional stages of vegetation will decrease but remain present throughout their range."

69. The statement the Department refers to in Chapter 4 of the Draft Plan has been revised as follows, "Wildlife populations associated with mast-producing trees and snags will decrease but remain present throughout their range."

Tens of thousands of acres of Forest land will not be harvested under even-aged management at one time. Land under even-aged management will always be in various stages of growth, providing some snag and oak habitats. The Forest has also adopted a policy of establishing wildlife clumps or aggregations of mature timber to provide oak, snag, and dead and down habitats where even-aged management is practiced.

70. Our Forest Riparian Guidelines provide for the protection and maintenance of riparian habitat utilized by many species, not just species dependent on late successional stages. The statement referred to in Chapter 4 has been revised to reflect this concept.

71. We believe you incorrectly interpreted this section on the Summary of Future Range Resource Condition in Chapter 4 of the Draft Plan. The Sequoia NF does not plan to place additional livestock on areas managed under even-aged timber management prescriptions or chaparral areas altered from prescribed burning.

72. Refer to Response 53 for an explanation to this comment on proposed ski areas.

73. Refer to Response 64 for an explanation to this comment about potential range/wildlife management conflicts.

74. The statement the Department refers to in Chapter 4 under the Resource Condition Section has been revised. Also, provisions to control grazing in areas where resource conflicts exist can be found in Allotment Management Plans which describe the management of range resources and grazing practices on specific areas of the Forest. These plans are updated every ten years and are available for review.

75. The table referred to, "Management Area Prescription Acreage" already emphasizes wildlife and dispersed recreation on 25,000 acres in B05, OW5, MC5, PS5, and CF5 areas. The Forest believes it has provided a balance of management emphasis across the Forest.

76. See Response 10 for an explanation to your comment regarding resident fish population levels.

77. No change was made to the text based on this comment referring to the development of non-roaded areas. The construction of roads is necessary to meet the intent of multiple use management on the Forest.

78. See Responses 10 and 50 for an explanation to your comment regarding fish habitat improvements and WFUD's.

79. The projected increases in water quantity, referenced in Chapter 4 of the Plan, have been revised downward as a result of several modifications to the Final Plan. The Forest believes the Final Plan provides a balance between satisfying demands for increased water and protection of aquatic habitats through the implementation of Riparian Guidelines and Best Management Practices.

80. The table referred to in this comment is not the appropriate place in the document to discuss the effects of road construction. See Chapter 4 of the FEIS. Site specific sedimentation problems in stream habitats will be addressed in environmental assessments for specific projects and mitigated through proper road construction and the implementation of Best Management Practices and the Forest Riparian Guidelines.

81. We concur with this comment.

82. Refer to the revised sections addressing OHV use on Sequoia NF which restrict OHV use to designated roads and trails in Chapter 4 of the Final Plan.

83. See Response 60 for an explanation to this comment.

84. See Response 62 for an explanation to this comment.

85. We concur with this comment regarding planned and unplanned ignition.

86. See the revisions made to this section of Chapter 4 of the Plan regarding listed species. Specific species are no longer mentioned in this section. Refer to table 3.5. Federal and State Listed Wildlife Species on the Sequoia NF. for the revised list of species. The Forest has no knowledge of the listing of the South Fork Kern golden trout and Breckenridge Mountain slender salamander by the state or federal government.

87. Standards and Guidelines as described in Chapter 4 of the Final Plan provide for the maintenance and protection of all plant, fish, and wildlife species to insure adequate population levels and distribution to provide for their continued existence throughout their current range. To this end, the Forest does not believe it is necessary to include standards, guidelines. and management prescriptions for those individual species mentioned in this comment. These elements pertaining to the management of these species should be addressed in recovery and/or management plans written specifically for them. As stated in the Fish, Wildlife, and Plants Standards and Guidelines in Chapter 4 of the Plan, the Forest will participate, when requested, with the Regional Office, the USDI Fish and Wildlife Service, and the California Department of Fish and Game in the development of recovery or management plans for species listed in Chapter 3 of the Plan.

88. The Final Plan and EIS has been revised throughout the documents to describe the management and protection of four superior nest sites on the Forest.

89. Refer to the revised Standards and Guidelines for Snag and Down Log Management in Chapter 4 of the Final Plan, describing increased maintenance and protection of dead and down log management and snag management.

90. See Response 89 for an explanation to this comment.

91. The revised guideline for oak management provides for the retention of some oak on a compartment basis. It will not always be possible to retain oak everywhere where it currently exists, for instance on even-aged managed timber stands where cable harvesting takes place. If oaks are not damaged during the falling of timber, they will most likely be burned when site preparation activities take place. These activities will temporarily displace oaks from the area. Since oaks are predominantly stump sprouters, they will return to the site soon after the area is prepared for planting.

92. See Response 32 for explanation to this comment. Also, the Forest has developed and is implementing Riparian Guidelines wherever appropriate.

93. The language referred to regarding limiting the definition of meadows to two acres or larger in size has been revised to read "Consider meadows smaller than two acres as part of the riparian area."

94. The Forest's Riparian Guidelines take stream shade and water temperature into consideration.

95. The sections of the Plan and EIS pertaining to spotted owls have been extensively revised from the Draft to the Final Plan. A description of estimated habitat capability on the Forest for spotted owls is provided in Appendix B of the FEIS. A description of the current management of this sensitive species is contained in Chapter 3 of the Final Plan under the section describing MIS selection. The Region 5 guidelines for spotted owl management have been referenced in several places throughout the document.

96. The Standards and Guidelines for range management in Chapter 4 of the Final Plan have been revised. The mulch management standard of 400 pounds of residual dry matter is a minimum standard. On the majority of the Forest's annual grass range, 500 to 700 pounds per acre of residual dry matter is commonly left at the end of the grazing season.

97. See Response 36.E as it pertains to increases in livestock numbers on the Forest.

98. The Forest believes livestock numbers at current 1987 levels are consistent with protection of meadow habitat. The allowed use standards developed for the Forest's wet meadows provide for leaving a percentage of forage in the meadows which provides forage for wildlife and vegetation for stabilizing meadow soils.

Also, refer to Response 36.E for further explanation to this comment.

99. Cattle are generally not allowed on mountain meadows until after July 1 of each year. Also, we are currently developing new meadow Standards and Guidelines which will address many aspects of meadow management. There was no change made to the text based on this comment.

100. The Forest does not agree with the Department that tractor logging should take place only on slopes of 20 percent or less. We believe tractor logging can take place on slopes up to 40 percent without substantial risk of erosion on most stable soils.

101. Spotted owl habitat areas are maintained or managed according to Region 5 guidelines under all alternatives in every management area in which they exist.

102. Fishing has been included.

103. Fishing and fisheries resources have been added to the majority of management area prescriptions. Also, the fisheries section in Chapter 3 of the Final Plan has been expanded.

104. The USFS Regional Coordination Guidelines for wildlife habitat improvement has been referenced as a guideline to provide direction when completing chaparral management projects.

105. The cycle has been changed to 40 years.

106. See Response 96 for an explanation to this comment.

107. Fishing was not added to this emphasis since fishing opportunities are very limited in the pinyon-sage ecosystem.

108. We concur with this statement.

109. Fish habitat protection is covered under Forest-wide Standards and Guidelines which apply to all management prescription areas where appropriate.

110. The text has been revised to indicate wildlife habitat improvement may include prescribed burning.

111. Since the prescription emphasizes the natural role of fire in wilderness, it is inappropriate to elaborate on the fisheries resource in this portion of the text.

112. The WC4 prescription has been eliminated in the Final Plan.

113. See Response 107 for an explanation to this comment.

114. The B05 prescription has been eliminated in the Final Plan.

115. See Response 114 for an explanation to this comment.

116. See Response 114 for an explanation to this comment.

117. The text has been revised to state: Livestock management techniques will be utilized to reduce direct conflicts with dispersed recreation and wildlife.

118. The text has been revised to state: Maintain an average of 3-5 snags per acre.

119. Text has been added to this prescription to read: Consider fish and amphibia in habitat improvement projects.

120. Fishing has been added to this emphasis.

121. The statement has been revised to consider conflicts with wildlife.

122. The text has been revised to read: 0-20 years 60%
20-30 years 40%

123. See Response 119 for an explanation to this comment.

124. See Response 104 for an explanation to this comment.

125. See Response 96 for an explanation to this comment.

126. See Response 107 for an explanation to this comment.

127. See Response 107 for an explanation to this comment.

128. See Response 96 for an explanation to this comment.

129. The statement under the Management Area Prescription CF5 has been revised to read: Timber harvesting will be designed considering wildlife; recreation, and visual concerns. Also, the standards referred to have been revised for timber and wildlife sections.

130. Fishing has been added to this emphasis (CF5 prescription).

131. Number 2 under the Fish & Wildlife portion of the CF5 prescription now mentions fisheries.

132. These "timber" items have been revised.

133. Refer to Response 96. Also see revisions made to prescription B06 which address many of the expressed concerns.

134. The wording under the OW6 prescription has been revised to state that habitat will be maintained or enhanced.

135. Item 1 under "Fish and Wildlife" has been revised to state: Provide for 1.5 snags per acre.

136. There is no reference to pinyon-sage on 4-85 of the Draft Plan.

137. See Responses 134 and 96 for an explanation to this comment.

138. The acreage referred to includes meadows and transitory range created or sustained mainly through timber harvest activities. The emphasis section and the fish and wildlife opportunities section have been revised to provide more balance between meadow uses. Grazing seasons have been adjusted in the past to allow for the majority of the fawning season to take place before cattle arrive on the meadows. Also, allowed use standards for mountain meadows provide for wildlife needs in requirements which allow only a percentage of total available forage to be harvested by livestock.

139. The text has been revised to describe fisheries protection.

140. See Response 139 for an explanation to this comment.

141. The Forest believes the Forest-wide Standards and Guidelines are adequate to maintain wildlife species and associated habitats. The Forest already utilizes Deer Herd Management Plans, developed by the Department of Fish and Game, when assessing the impacts of and developing prescriptions for timber harvest activities. These deer herd plans clearly identify key deer habitats which are considered during the planning process.

Roads on the Forest are often closed to vehicle travel and/or restored following timber harvest activities. This includes gate closures and seeding projects.

Modification of cutting units for wildlife benefits takes place on a regular basis and will continue after the Final Plan is in effect. The Forest-wide Standards and Guidelines provide for all of the recommendations noted in the comment with the exception of #2. Retention of a vegetative screen is achievable except where cable harvesting takes place. It is not possible to leave adequate screening utilizing this harvest method.

142. The text has been revised to describe fisheries protection in #1 under Fish and Wildlife in the CF7 prescription.

143. The MC8 Management Area Prescription has been eliminated from the Final Plan.

144. The CF8 Management Area Prescription has been eliminated from the Final Plan.

145. See Response 144 for an explanation to this comment.

146. See Response 144 for an explanation to this comment.

147. See Response 144 for an explanation to this comment.

148. Fish and wildlife habitat improvements as described are adequate and, therefore, no change was made to the text based on this comment.

149. The general comments have been responded to in Responses 1-33.

150. The monitoring section has been greatly modified. The spotted owl program costs have been revised to $40,000 per year.

151. The Forest-wide Standards and Guidelines already provide for the protection of these species. Also, the revised Appendix A has added many plans that should be completed before other species are considered. Please see Appendix A of the Final Plan for details on the plans added to the list since the Draft Plan.

152. The Forest has added "Rise to the Future; Action Plan for National Forest Fisheries Program" to the Resource Plan list.

153. There are only four pages in Appendix B of the Final Plan. We believe you have confused this appendix with Appendix B of the EIS. In the revised Appendix B of the Final Plan under Fish and Wildlife. we have added goshawk population surveys as a research need. Also, the Forest will adhere to Region 5 direction for the management of this species.

Addendum 3.

The following responses are written in response to comments found in Addendum 3 of the California Department of Fish and Game's Comments on the Draft EIS - Sequoia Land and Resource Management Plan.

154. The Sequoia NF believes the Preferred Alternative is compatible with the objectives of the deer herd management plans. The objectives set forth in these plans will continue to be implemented in the future in cooperation with the Department of Fish and Game.

155. An explanation of benefits is provided in Appendix B of the FEIS under the section Benefits Used in the FORPLAN Analysis.

156. All text and tables where reference has been made to spotted owls have been revised. Goshawk numbers have remained approximately the same although text has been added to Chapters 3 of the Final Plan and EIS and Appendix B of the FEIS describing the habitat and management of this species.

The analysis process used to determine total estimated habitat capability for spotted owls on the Forest is provided in Appendix B of the FEIS. Currently, the Forest capability is approximately 75 pairs, which concurs with the Department's estimate. The Forest's active monitoring program for spotted owls will determine the suitability of spotted owl habitat areas (SOHA's) over time by measuring reproductive success or failure of the owls.

157. Your assumption is correct. The figures represent M pounds.

158. See Responses 10 and 13 for an explanation to this comment.

159. See Response 3 for an explanation to this comment.

160. The revised text under MMR's in Chapter 2 addresses the Regional Guidelines. See Appendix B for an explanation of Forest habitat capability for spotted owls.

161. Diversity will be maintained at the Forest level.

162. See Response 60 for an explanation of the Kings River legislation.

163. The entire section of Fish and Wildlife Standards and Guidelines has been revised to provide more concise direction.

164. We concur with this statement concerning old-growth habitat. Spotted owl habitat areas have been established using Regional Guidelines and will be maintained using the same guidelines.

165. See Response 89 for an explanation to this comment.

166. See Response 91 for an explanation to this comment.

167. The text in Chapter 3 of the FEIS under Sensitive Plants provides for the protection of all sensitive plants until management plans are written for them. The guideline for sensitive plants in Chapter 2 of the FEIS states "Manage sensitive plants to ensure they do not become threatened or endangered." Appendix A of the Final Plan provides for the preparation of Sensitive Plant Species Management Guides as needed.

168. See Responses 32 and 92 for an explanation to this comment concerning monitoring and riparian areas.

169. See Response 93 for an explanation to this comment.

170. See Response 96 for an explanation to this comment.

171. The section of text referred to in your comment has been eliminated.

172. See Response 98 for an explanation to this comment.

173. Several specific Standards and Guidelines have been described in the Final Plan and EIS providing for the protection and maintenance of wildlife habitat. Please refer to the Standards and Guidelines developed for fish, wildlife and plants (general), coordination guidelines, old-growth habitat, snag and down log management, oak management, riparian areas, meadows, and sensitive plants in Chapter 4 of the Final Plan, and Chapter 2 of the FEIS.

Also, the management direction has been modified in the final documents to include uneven-aged management as an alternative method of timber management.

174. It is difficult to regulate firewood gathering or develop other specific guidelines for species such as the Kern Canyon slender salamander when so little is currently known about their population numbers and limited distribution. If the Department of Fish and Game will provide their most recent detailed reports describing population and distribution studies on this species, the Forest Service will cooperate in the development of a management plan for the Kern Canyon slender salamander.

Forest guidelines provide for tractor harvesting of timber on slopes up to 40 percent unless erosive soils are present. Our Forest Riparian Standards and Guidelines provide optimum protection of riparian and stream habitat often with streamside management zones of greater than 100 feet. A cumulative effects methodology system is now in place and functioning on the Forest. Extensive meadow and stream rehabilitation and stabilization projects have already been accomplished and will continue to be implemented on many of the streams contributing to critical habitat for golden trout. A tremendous amount of work has been accomplished under the direction of the Little Kern Golden Trout Recovery Plan, and will continue into the future.

175. One of the main purposes of the Forest-wide Standards and Guidelines, as developed in Chapter 4 of the Final Plan and Chapter 2 of the FEIS, is to maintain and protect all critical habitats regardless of the prescription for a management area. Key habitat areas, as described in deer herd management plans and other documents, are given specific consideration when project level environmental assessments are developed.

176. See Response 4 for an explanation to this comment.

Also, projected recreation use on Sequoia NF and all other Federal lands is expected to increase substantially in the future. Many of these forest visitors will come to the Forest specifically to interact with wildlife in one way or another. Therefore it is logical to make a tie between recreation and wildlife.

177. The potential effects to wildlife from proposed ski areas will be assessed through the development of environmental impact statements specifically written for these projects.

178. See Response 82 for an explanation to this comment.

179. See Response 60 for an explanation to this comment.

180. We concur with this statement.

181. See Response 10 for an explanation to this comment.

182. See Response 95 for an explanation to this comment.

183. See Response 36.E for an explanation to this comment.

184. The retention standard for dead and down material has been substantially increased from 35 cubic feet per acre in the Draft Plan to 132 cubic feet per acre in the Final Plan.

185. The Forest Riparian Management Guidelines will be used to determine stream management zone widths. The width of these buffers will vary from 25 feet to 220 feet depending on the stream class and percent slope.

186. See Response 4 for an explanation to this comment.

187. By shifting management emphasis to larger, heavily-used sites, better overall management of the recreation resources and the resources they affect can be achieved.

188. Current and future management of blue *oak* habitat is not to maximize livestock use. The Forest believes that current management of this habitat is not causing continued degradation, poor regeneration, and a reduction in population levels of numerous wildlife species. Blue *oak* habitat is currently available and will continue to be available for many uses, including the grazing of livestock, providing wildlife habitat, and providing recreational expriences. Our Forest-wide Standards and Guidelines provide for the maintenance of all habitat types across the Forest in sufficient acreage to sustain viable populations of all species.

Also, the Forest would be interested in reviewing the Department's reports describing site specific data indicating poor regeneration of blue *oak* and declining wildlife population studies caused from livestock grazing on the Forest. These reports will assist the Forest in future management of this habitat type.

189. The revised increase in deer numbers is 14,000 animals. The Forest disagrees with the Department that deer numbers will decline. Recreation use is expected to increase on tne Forest, but the management of recreation elements as described in the Final Plan will concentrate activities such as camping and OHV use on less total acres than is currently taking place. Emphasis on camping will be increased at the heavily used sites and decreased in less used areas. OHV use will be restricted to designated

roads and trails (most of the Forest is currently open to this activity). An active road closure policy will still be in effect.

See Response 36.E for a specific explanation to grazing. Timber harvesting will provide valuable transitory forage for deer in the conifer zone. Oaks will be maintained in reduced numbers in some areas and increased in other areas where conifers are harvested that are competing with oaks for space, light, and nutrients.

190. See Response 95 for an explanation to this comment.

191. See Response 10 for an explanation to this comment.

192. See Response 10 for an explanation to this comment.

193. Species, dependent on early successional vegetation, will benefit from unplanned and prescribed burning. The areage-burned figures listed under FIRE - Range, Wildlife, Watershed are combined acres from the other categories mentioned in the comment.

AUM numbers are currently at 71,000. There are no plans in our Forest management to increase above this level.

194. The section of text the comment refers to has been revised.

195. See Response 10 for an explanation to this comment.

196. Our Forest goal is to maintain current fish habitat capability. which is 84 percent of the 1995 projections. To this end, the Forest is not in compliance with RPA goals.

197. A rest rotation system (in the strict sense) of cattle grazing is not appropriate on Forest allotments due to the large amount of fencing and man-hours required to effectively manage cattle this way. The Forest practices a form of rest rotation on the majority of grazing allotments in that cattle are taken off the Forest for varying periods of time, then turned back onto the Forest when the vegetation is determined to be ready for grazing use.

198. See Response 196 for an explanation to this comment.

199. The Amenity Emphasis Alternative has been revised to provide greater emphasis to non-market resources. A greater portion of the unroaded area will remain unroaded, and timber harvesting has been reduced from levels proposed in the DEIS. The amount of old-growth habitat reduction is less than all other alternatives. The proposed alternative should be taken in the context as it relates to the other proposed alternatives in the FEIS.

200. Native fish are considered and managed under the direction described in the fisheries section in Chapter 3 of the Final Plan, and in the Forest-wide Standards and Guidelines.

201. Nowhere is it stated that eliminating summer cattle use in meadows will result in a 10 percent reduction in AUM's on the Forest. This alternative implies that all the grazing would take place outside wilderness, meadows, and riparian areas, and be limited to the months of February through June. The majority of grazing would take place on the annual grasslands and mixed chaparral. The shortened season of use and adjustments in total livestock numbers would result in the 10 percent reduction in AUM production. More cattle would be grazed for a shorter period of time to meet the projections.

202. See Response 89 for an explanation to this comment.

203. Since specific details are not provided in this comment, the Forest has no response.

204. This alternative should be taken in context to the management direction described in the other alternatives. The Forest is mandated through many laws to provide for multiple use of the Forest resources so impacts to all resources will occur. It is the degree or level of impact to resources and output levels that vary from alternative to alternative. In this way the Forest has provided a broad range of alternatives in the EIS which emphasize different aspects of forest management. The WFV Alternative provides for increased recreational use as it relates to increased hunting and access on the Forest. Harvest species are emphasized. Timber harvesting will increase harvest species such a deer, and increase access on the Forest through road construction.

205. See Response 204 for an explanation to this comment.

206. All the alternatives will result in a reduction of old-growth habitat. Only if no multiple use outputs are provided could the Forest sustain and increase the amount of old-growth habitat. NFMA regulations prevent the Forest from closing its doors to all uses except growing old-growth habitat.

207. See Response 10 for an explanation to this comment.

208. No change was made to the text based on this comment.

209. This portion of the text has been eliminated. Also, through the methods described in Chapter 3 of the FEIS (under fisheries) and through the implementation of Forest-wide Standards and Guidelines, Best Management Practices, and the Forest Riparian Standards and Guidelines, the mileage of streams requiring habitat repair will remain the same or decrease. The mileage will not increase as the comment suggests.

210. The errors pointed out in this comment have been amended.

211. The 470,000 acres of mature and overmature timber present on the Forest are well distributed across the Forest. The Forest does

not know where the figure 3,648 acres of old growth came from, nor do we know what definition of old growth is in use in this comment. Our vegetative data base indicates 470,000 acres of mature and overmature (old-growth) timber on the Forest.

212. The statement has been revised to state: Hunting use may increase as deer numbers increase.

213. The table has been footnoted to provide the sources of the information.

214. Phacelia nashiana and Carex tompkinsii have been added to the Sensitive Plant List. Calochortus striatus and Mimulus pictus are not considered as sensitive plants on the Forest. Standards and Guidelines describing the size of areas to be managed for rare plant species will be defined when management plans are written for them.

215. The Regional Environmental Impact Statement on Vegetation Management has been referenced for additional information on the effects of pest management.

216. See Response 36.E for an explanation to this comment.

217. See Response 52 and 36.E for an explanation to this commen.

218. All of the potential Long Canyon RNA and a portion of the recommended Moses Mountain RNA are outside wilderness. By placing the other RNA's in wilderness, the Forest has lessened the potential for conflicts with other Forest uses.

219. There are five proposed special interest botanical areas described in the DEIS. All five will be officially established when the Final Plan is signed.

220. Past harvesting of whitewoods in giant sequoia groves has resulted in an abundance of successful regeneration. An inspection of the Dillonwood Grove or Mountain Home State Forest will illustrate this point.

221. The text has been revised to include meadows of less than two acres.

222. The Forest Riparian Standards and Guidelines, developed since the Draft Plan was issued, comply with all Federal direction mentioned in the comment and apply to all the alternatives.

223. An inspection of any even-aged harvest unit on the Forest will reveal an abundance of early successional vegetation present except on units treated within the last six months. The vegetative release treatments described in Chapter 3 of the FEIS are utilized to reduce competition between planted seedlings and native vegetation. The treatments do not remove all vegetation from the site for prolonged periods of time. After the seedlings

are planted, release treatments often do not occur for several years. During this time, an abundance of greases, forbs, and young shrubs become established and are available for utilization by many wildlife species. After release treatments, the trees grow rapidly, while pioneering plants once again establish populations in the areas.

Livestock may be drawn to these areas, but grazing will not be emphasized nor will livestock numbers be increased to harvest this forage.

224. See response 57 for an explanation to this comment.

225. There is no intention or direction given in the Final Plan or EIS to greatly increase livestock use of the blue oak woodland. Grazing seasons of use and livestock numbers will remain at current levels for all areas on the Forest through this planning period. See Response 36.E for further explanation of grazing on the Forest.

226. The figure 16,539 has been revised to 43,000.

227. The description of the importance of live oak woodland to wildlife diversity is correct when compared to the blue and black oak stands as the test describes. Therefore no change was made to the text based on this comment.

228. See Response 10 for an explanation to this comment. Also, the text describing lack of access for fish-stocking trucks has been omitted in the FEIS.

229. See Response 10 for an explanation to this comment.

230. A. See Response 223 for an explanation to this comment.

B. The figures in the table have been revised to indicate a larger impact to late successional stages from timber harvest activities.

C. Our Forest Riparian Standards and Guidelines, put into effect following the issuance of our Draft Plan and DEIS, greatly increase the protection and maintenance of riparian habitat.

D. The figures in the table have been revised to indicate a larger impact to snag-dependent species due to timber harvest.

E. The figures in the table have been revised to indicate a larger impact to hardwood-related species from timber harvest activities.

231. The section of text this comment refers to describes in detail how developed and dispersed camping areas will be managed. The Forest assumes that the many visitors in the future will take advantage

of all the recreational activities available in and around the sites. Therefore. we did not feel it was necessary to list specific activities such as hiking or fishing.

232. See Response 36.E and 65 for an explanation to this comment.

233. The text has been revised to state overuse by livestock rather than livestock grazing.

234. See Responses 3, 13, and 11 for an explanation to this comment.

235. See Response 175 for an explanation to this comment.

236. See Response 95 for a partial explanation to this comment. In addition, the Forest, with the assistance of volunteers and Department of Fish and Game personnel, have surveyed intermittently for spotted owls for approximately 12 years. Beginning in 1986, surveys were greatly expanded to increase our knowledge of spotted owl populations and dynamics. This program will continue into the future. A map indicating the locations of 40 spotted owl management areas has been included in the final document map package.

237. The section referred to has been revised to provide more explanation of spotted owl management. In regard to viable populations, the National Forest Management Act requires the Forest Service to maintain viable populations of animals. We believe our Forest Plan, as written, will fully satisfy this portion of the Act.

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STATE OF CALIFORNIA—THE RESOURCES AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF FORESTRY
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April 28, 1986

Mr. James A Crates, Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Dear Mr. Crates:

The California Department of Forestry wishes to comment on the Draft Management Plan tor the Sequoia National Forest. Governor Deukmejian recognizes that national forest plans will have 8 significant effect on the future of our state -- particularly rural California. The Governor is contident that by working together responsible policies can be developed that will foster a balanced approach which recognizes the need tor rural economic development as well as the need tor the preservation ot our precious natural resources tor future generations. The Governor has requested that the Department of Forestry and the Business, Transportation and Housing Agency look 8t each plan. We have been in contact with the Business, Transportation and Housing Agency concerning this management plan.

In our review of the draft plan we compared it with the five areas ot concern raised at the Board ot Forestry's Centennial Conferences. These include: 1) rural economic development: 2) protection of the biological base; 3) social pressures on the land: 4) public *and* private property rights: and 5) coordination and planning. We also used some of our own data to supplement that provided by the Draft EIS.

As a result of our analysis based on Centennial issues. five areas of major concern were identitled for this forest plan. The major areas of concern are: 1) recreation; 2) aggregate review of national forests plans: 3) adequate log supplies tor the lumber industry: 4) protection of the biological base: and 5) budget restrictions. These *areas* of concern were used to determine which alternative best meets the needs ot this region of the state. The Department's recommendations for the Sequoia National Forest Management Plan are as follows:

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1. RPA Alternative

Based on our analysis, we would recommend adoption of the RPA alternative as being best able to meet the needs of the citizens of Callfornla. This alternative has a high level of commodity production to support rural development and still maintains a healthy biological base. Assuming proposed budgets will be available, the RPA alternative is most responsive to the future demands for increased recreation capacity, sustained timber supply and a well protected resource base.

2. Adequate Log Supply for Lumber Industry

Eighty to ninety percent of the logs manufactured in Fresno, Madera, Kern and Tulare counties are from national forest sources (Table I). About 4 to 8 percent of the total manufacturing jobe in Bresno, Kern and Tulare Counties are lumber and wood products industry jobs (Table II). Based on these facts, it is critical that the national forest continue to provide logs which will support this segment of the local economy in these counties.

3. Aggregate Review of Forest Plans

Our analysis indicates that three counties will be primarily affected by the plan: Fresno, Kern and Tulare. These counties contain other national forests which will also have an impact on them. Our inability to review these plans simultaneously is frustrating because their aggregate effects could be significant. This highlights one of the ujor shortcomings of the present "forest by forest-planning process. We would suggest that to resolve this concern for this round of planning, aggregates of plans by economic region be reviewed before final decisions on preferred alternatives are made for individual national forests.

Whn management plans are revised for the second decade plan, the plans should be released in aggregate by economic region. This would facilitate a better economic analysis of the plans and their actual impact on the rural communities of California.

4. Recreation

The Department con — that the plan must allow tor the increased demand for outdoor recreation--both developed and dispersed opportunities. The RPA alternative provides an acceptable level of growth in both types of recreation.

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As demand for recreational facilities increases and if budgets decrease, there may be some need to look at a fee structure to help offset dollar deficits in the recreational facilities and operations budgets. The Department suggests that data be collected now to support the need for recreational user fees during future planning processes.

5. protection of the Biological Base

The Department is concerned about the protection of the biological base under all alternatives. The Department sees the protection of the national forest from fire, insects and the loss of critical habitat as a priority. The national forest system has always reacted strongly to protect the biological base from fire and insects and to ensure protection of habitat. Final plans should strongly support the process. We also believe that the plan should address issues related to the presence of people such as the demand for emergency services and structural fire protection and limits to insect control program.

6. Budget Cuts

There is only one alternative that provides for a reduced budget and the rationale for reductions at this lower level is not clear. We believe that the plan must consider the effects of probable reduced budgets much more thoroughly. How the forest will manage with less dollars should be spelled out clearly. The Department's priorities under fewer dollars would be to first protect the biological base: second, insure a stable flow of logs to the forest products industry; and third, provide for increased recreational opportunities. We believe the final plan should reflect these priorities at a reduced budget level.

Thank you for the opportunity to comment on your proposed plan.

Sincerely.

For JERRY PARTAIN
Director

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Table I. Saw Mill Log Consumption (Source: FRRAP)

	Total Consumption MBF	Ownership Source Percent				
		State	National Forest	Own Wood Supply	Other Wood Supply	Other Private
Tulare & Kern 3	75,147	4.69	90.66	0	0	4.65
Fresno & Madera 4	81,004	0	82.84	12.35	4.81	1.98

Table 11. Employment Manufacturing and Lumber and Wood Products, by County, 1979-1983. (Source: County Business Patterns, US Census)

County	Year	Manufacturing	Lumber & Wood Prod	L&WP/Manuf
Ware	1979	12,251	1,495	12.20%
	1980	11,786	1,276	10.84%
	1981	11,611	1,042	8.97%
	1982	11,176	984	8.63%
	1983	10,473	852	8.14%
Kern	1979	7,760	236	3.04%
	1980	8,141	2S7	3.16%
	1981	8,443	216	2.56%
	1982	9,337	220	2.36%
	1983	8,009	407	5.08%
Fresno	1979	23,928	1,242	5.19%
	1980	22.569	1,015	4.50%
	1981	21,866	956	4.37%
	1962	20,081	689	3.43%
	1983	18,957	850	4.48%

California Department of Forestry (Note: The numbers of these responses key to those in the incoming letter.)

Resolution:

1. Thank you for your recommendation. However, we feel that PRF provides a better mix of forest uses. Please see Chapter III of the Record of Decision for our reasoning.

2. The Forest Plan proposes to make 101.6 MMBF per year available for harvest. This volume is comprised of 97 MMBF per year of green timber and 4.6 MMBF per year of salvage. The green timber harvest level is slightly above the present level of 95 MMBF. Our records indicate that the average annual timber harvest for the last 27 years has been 92 MMBF.

3. We recognize your concern. However, it is not practical to delay publication of the Sequoia's Plan for a year or more until the Sierra National Forest has completed its Forest Plan.

4. The topic of recreational user fees is beyond the scope of the Forest Plan. Congress decides whether such fees are to be imposed.

5. The Forest Plan provides the broad guidelines under which fire, insect, and disease protection will be provided. Program specific plans are the next step in the planning process. A fire protection plan will be prepared that will define the specific actions needed to protect the Forest resources and associated improvements from fire. The PRF Alternative places emphasis on fuel reduction projects in the urban interface. Structural fire protection will be provided in accordance with Forest Service policy.

6. Please see Appendix L of the FEIS for an explanation of the budgeting process and management priorities under reduced budgets.

#29-86
2491

RESOURCES AGENCY

GEORGE DEUKMEJIAN
GOVERNOR

State of California
Board of Forestry
1416 NINTH STREET
SACRAMENTO, CALIFORNIA 95814

April 28, 1986

Mr. James A. Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville. CA 93257

Dear Mr. Crates:

The State Board of Forestry wishes to comment on the Draft Management Plan for the Sequoia National Forest. By law, the Board is charged with representing the State's interests in federal land matters pertaining to forestry.

The Sequoia draft plan and draft environmental statement was compared with the five issue areas developed at the Board of Forestry's Centennial Conferences of March and Decenber of 1985. The issues identified are: 1) rural economic stability and development; 2) protection and maintenance of the biological base; 3) social pressures in the rural land base; 4) rights and responsibilities of public and private ownership; and 5) coordination and planning.

The Board has approached the plan in the belief that the Sequoia National Forest should be positioned to meet the needs of the people of California in the coming decade. Our analysis indicates that demands for more 'recreation, a stable timber supply, a reliance on the forest for local revenue, and a well protected biological base are all part of that position.

Consequently, five areas of major concern were identified for this region of the state. These areas are: 1) the need for aggregate review of national forest plans: 2) the need for adequate lag supplies for the lumber industry: 3) the need to meet higher demand for recreational opportunities on the forest; 4) the need for protection of the biological base, and 5) concern over budget restrictions.

These five areas of concern were used by the Board of Forestry to evaluate each plan alternative and to help determine which

4-29-86
2491

alternative would best meet the needs of this region of the state. The results of this analysis and our recommendations are listed below.

1. RPA Alternative

Based on our analysis. we would recommend adoption of the RPA alternative as being best able to meet the needs of the citizens of California. This alternative has a high level of commodity production to support rural development and still maintains a healthy biological base. Assuming proposed budgets will be available, the RPA alternative is responsive to the future demands for increased recreation capacity, sustained timber supply and a well protected resource base.

2. Adequate Lou Supply for Lumber Industry

Eighty to ninety percent of the logs manufactured in Fresno, Madera, Kern and Tulare counties are from national forest sources (Table I). About 4 to 8 percent of the total manufacturing jobs in Fresno, Kern and Tulare counties are related to the lumber and wood products industry (Table II). Based on these facts, it is critical that the national forest continue to provide logs which will support this segment of the local economy in these counties.

3. Aggregate Review of Forest Plans

Our analysis indicates that three counties will be primarily affected by the plan: Fresno, Kern and Tulare. These counties contain other national forests which also will have an impact on them. The inability to review these plans simultaneously is frustrating because their aggregate effects could be significant. This highlights one of the major shortcomings of the present "forest by forest'' planning process. We would suggest that to resolve this concern for this round of planning, aggregates of plans by economic region be reviewed before final decisions on preferred alternatives are made for individual national forests.

4-29-86
2491

When management plans are revised for the second decade of planning, the plans should be released in aggregates by economic region. This would facilitate a better economic analysis of the plans and their actual impact on the rural communities of California.

4. Recreation

The Board concurs that the plan must allow for increased demand for outdoor recreation -- both developed and dispersed opportunities. The RPA alternative provides an acceptable level of growth in both types of recreation.

As demand for recreational facilities increases and if budgets decrease, there may be some need to look at a fee structure to help offset dollar deficits in the recreational facilities and operations budgets. The Board suggests that data be collected now to support the need for recreational user fees during future planning processes.

5. Protection of the Biological Base

The Board is concerned about the protection of the biological base under all alternatives. The Board sees the protection of the national forest from fire, insects and the lass of critical habitat as a priority. The national forest system has always reacted strongly to protect the biological base from fire and insects and to ensure protection of habitat. Final plans should identify continuing efforts to this end in detail. We also believe that the plan should address issues related to the presence of people such as the demand for emergency services and structural fire protection and limits to insect control programs.

6. Budget Cuts

There is only one alternative that provides for a reduced budget and the rationale for reductions at this lower level is not clear. We believe that the plan must consider the effects of probable reduced budgets much more thoroughly. How the forest will manage with less dollars should be spelled out clearly. The Board's priorities under fewer dollars would be to first protect the biological base;

4-29-86
2491

second. insure a stable flow of loss to the forest products industry: and third, provide tor increased recreational opportunities. We believe the final plan should reflect these priorities at a reduced budget level.

Thank you for the opportunity to comment on your proposed plan.

Sincerely yours,

Harold R Walt

Harold R. Walt
chairman

4-29-86
2491

Table I. Saw Mill Log Consumption (Source: FRRAP)

	Total Consumption MBF	Ownership Source Percent				
		State	National Forest	Own Wood Supply	Other Wood Supply	Other Private
Tulare & Kern 3	75,147	4.69	90.66	0	0	4.65
Fresno & Madera 4	81,004	0	82.84	12.35	4.81	1.98

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	1982	20,081	689	3.43%
	1983	18,957	850	4.48%

Board of Forestry

Resolution: (Note: The numbers of these responses key to those in the incoming letter.)

1. Thank you for your recommendation. However, we feel that PRF provides a better mix of forest uses. Please see Chapter III of the Record of Decision for our reasoning.

2. The Forest Plan proposes to make 101.6 MMBF per year available for harvest. This volume is comprised of 97 MMBF per year of green timber and 4.6 MMBF per year of salvage. The green timber harvest level is slightly above the present level of 95 MMBF. Our records indicate that the average annual timber harvest for the last 27 years has been 92 MMBF.

3. We recognize your concern. However, it is not practical to delay publication of the Sequoia's Plan for a year or more until the Sierra National Forest has completed its Forest Plan.

4. The topic of recreational user fees is beyond the scope of the Forest Plan. Congress decides whether such fees are to be imposed.

5. The Forest Plan provides the broad guidelines under which fire, insect, and disease protection will be provided. Program specific plans are the next step in the planning process. A fire protection plan will be prepared that will define the specific actions needed to protect the Forest resources and associated improvements from fire. The PRF Alternative places emphasis on fuel reduction projects in the urban interface. Structural fire protection will be provided in accordance with Forest Service Policy.

6. Please see Appendix L of the FEIS for an explanation of the budgeting process and management priorities under reduced budgets.

2491

State of California

Business and Transportation Agency

Memorandum

To : Office of Plannfng and Research
State Clearfnghouse
1400-10th Street
Sacramento, CA 95814

Attention Peggy Osborn

February 27, 1986

File : Tul-General
SCH #85111813

From : DEPARTMENT OF TRANSPORTATION
District 6 Transportatfon Plannfng

Subject :

We have revfewed the DEIR for thr Sequoia Hatfonal Forest Land and Resource Management Plan and offer the fo lowing comments.

It fs stated fn the DEIR that the forest road system provides access to the publfc and for the administration of resources. In essence the transportatfon system proposed under each alternatfve is developed fn response to resource management demands whfch are primarily timber production and recreatfonal use.

Generally speaking the plan recognfzes that there will be an fncrease In trafffc. Our concerns have been expressed fn the past relatfve to the trafffc fncreases whfch wfll be brought about by the development of recreatfonal facilities. In general the traffic increases that can be estimated from Table 3–19 on page 3-79 of thfs E.I.S. are only slfghtly less than our estfmate for the period up to the year 2010. Therefore the growth in trfps would not be totally unanticipated.

The development of three ski areas (including Peppermint) whfch would be double the trfp generatfng estimate of Peppermint dws cause us some concern. The trips generated by these areas tend to be concentrated in the same time of year and impact the same highways. As stated during the Peppermint review these hfghnays wfll experience periods where demand wfll exceed capacity. The additional trips can only exacerbate the problem. Also as stated in the Peppermint review there are currently no major improvements planned to increase capacity other than wfdenfng the Tule Rfver Bridge on Highway 190. For ywr convenience attached are copies of comments we have expressed fn the past relatfve to development in the Peppermint Ski resort and the Foothill Growth Plan.

Although extensive development wfll not occur in the near future there are indicators that Increased use of the Sequoia National Forest wfll present increasing problems. For example, fn the Kern Rfver Canyon State Highway 178 (from Post Mile 13.5 to Post Mile 830.5) does not have sufficient pull out areas adjacent to the travel way to accommodate roadside parking. Increased use of pullouts by lunch wagons fs creating a hazard and is an illegal encroachment due to the fact that they are operatfng wfthfn the State rfght of way without an Encroachment Permit.

Office of Plannfng and Research
February 27, 1986
Page Two

Commerical and private development along State Route 180 contfnue to increase, thus increasing the conflict between logging trucks and all other traffic, fn fact this fs also the case on State Routes 168, 155 and 190. Plans shwld fnclude increased turnouts for logging trucks. Logging area access routes should be planned and permanent connections made to mutes fnstead of the haphazard temporary connections made each season. Fire mads fall fn the same category thus creating the same type of problems as lagging mads.

In summary although the plan recognizes the trafffc increases whfch wfll be brought about by land use development the plan does not identify mitigation measures for the forecasted traffic.

NATHAN M. SMITH
District 6 Transportation Planner

MGP:JA
Attachment
ui: MGP

249/ ~~AMS~~

STATE OF CALIFORNIA—TRANSPORTATION AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 12616, FRESNO 93778

MGP

January 13, 1986

6-Tul-190
FEIS Pepperwint
Mountain Resort

Mr. Jams A Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Portervflle. CA 93257-2C·

Dear Mr. Crates:

We have reviewed the Pepperwint Mountafn Resort Final Environmental Impact Statement. and ne are especfally concerned with the elements relating to the fmpacts on State Hfghuay Route 190. While the environmental document does indicate the technical levels of service that could be expected on Route 190, f t does not adequately describe the fmpacts these levels of service have on the publfc nor does the document fndicate any major mitigation measures on the 41-mile section of Route 190 between the junction of Rwte 65 and Quaking Aspen, The narratfve a t the top of Page 186 Indfcates that tle only mitigation measures pmvfded are confined to guard rafl at spot locations and turnouts for chaining areas. While these two proposed mitigation measures are fmportant. they do not address our major concern rhfch is the expected congestfon levels on Route 190.

In our letter dated Kovember 5, 1984 to Mr. James Allen, we fndfcated our concerns and the probable public reaction nhen the expected operating conditfons on Route 190 reach 0 and E service levels. As these levels of service occur, we foresee two potentfal situations emerging since these anticipated levels of service will be unacceptable to the general publfc.

One situation that is likely to occur fs that Route 190 (without major improvement and major capftal expenditure) wfll serve as a 'bottleneck., and the level of usage of the planned ski facility will be lower than its planned capacity, We foresee this 'hour glass' potential for several reasons. First, level of servfce E is, fn general, unacceptable to the travelling public: and. secondly. when long distances are involved, a certain percentage of the travelling public will consider the trip as too bfg a hassle and therefore not worthwhile for recreational purposes.

The second sftuatfon that fs almst certain to occur as the skf facility develops, and as congestion levels increase on Route 190, is that there will be a high level of publfc complaint. As we have previously Indfcated to you.

the cost of improving thfs mountainous section of Route 190 to a higher standard could be in the $100 million cost range. This cost magnitude probably exceeds any reasonable capability of the developer to mitigate. While future financing for State highways fs uncertain, f t appears very unlfkely that funds would be available to improve thfs route to serve a single recreational facf lity.

In previous correspondence. we have also conveyed our concerns for the impacts your proposed development will have on the operating conditions of Route 65. These concerns still exist; however. Route 65 serves a much broader range of interregional travel than just the ski facflfty. and major Improvements to Route 65 can be made much more cost effectively than to Route 190. Route 65 . is in flat or rolling terrain, on relatively gwd alignment, and lanes could be added at a 'reasonable' cost per mile. Route 190, however, is in very mountainous terrain, and the cost per mile for major improvement is virtually prohibitive. The future need for improving Route 190 to a higher standard is almost totally contfngent upon the demand created by the development of the ski area.

The information contained in this letter should be carefully weighed before making a final decision on proceeding with the proposed ski resort development. It also appears essential that these impacts be fully described to the public since funding to correct these deficiencies is very unlfkely.

Yew truly yours,

ORIG SIGNED JERRY B BAXTER

JERRY B. BAXTER
Director of Transportation
District 6

GAM:DC
CC: MBP
NMS
OLWileman, Hdq.OOTP
OGWilson, Ofr.Pub.Wks.,
Tul.Co.
James Allen, Forest Engr.

2492

STATE OF CALIFORNIA—TRANSPORTATION AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 12616, FRESNO 93778

January 25, 1985

6-Tul-190
USFS Peppermint Mtn. Resort

Mr. James Allen
forest Engfneer
Sequoia Hatfonal Forest
900 West Grand Avenue
Portervflle, CA 93257

Attention Mr. Darrel Cherry,
Special Projects Engineer

Ye have reviewed the Transportatfan Working Paper far your proposed Peppermint Project. I would like to compliment you on ywr attempt to present a rational analysts of an extremely complex problem.

You have used some novel approaches to estimate the operatfng characteristics of the anticipated travel impacts of the project. For instance. extending the 'peak hour" conditions to a two- to four-hour average condition may be appropriate for thfs type of facility.

Althwgh f t may be technically correct for thfs working paper. it should be pointed out that drivers will probably be "complaining" well before volumes reach Level E service. Some of the complaints may come from non-project traffic not being able to freely access the main routes at Intersections. private drives, etc., as well as the project visitors. However. any attempt at a rational level of service analysis may be misleading due to the restrictive grade and alignment of the roadways."

Ye have no way of estimating at thfs time whether the costs for construction or reconstruction and maintenance needs are adequately presented. However, I do believe these sections present representative-data regarding these aspects. As we discussed in December, we can commit only to snow removal level 3 service. (This is the minimum effort. similar to the older designation level D.)

Althwgh other analysis techniques might be used to estimate the traffic impacts of the Peppednt proposal. I think some general conclusions can be determined with this working paper, particularly considering Alternate 3 They are:

1. There will be noticeable but not intolerable increases in traffic as a result of the project.

.2491

Mr. James Allen
January 25, 1985
Page Two

2. There are several feasible route choices rlthfn the mountain portions of the access routes.

3 There may be a few (10-15 times per season) Sunday evening peaks when congestion will be fairly severe.

4. There will be some impact on Route 65 north of Bakersfield. that route being common to several mountain corridors.

5. Because of the few instances of maximum congestion impacts and overall low traffic volumes, major capital improvements to the access mads should not be assumed. As we noted in our November 5, 1984 tetter. costs would be extremely high. and neither the publfc agencies nor the project developer could support such an expense considering the low cost/benefit.

6 There will be a need for chaining areas and other spot operational improvements as a result of winter trafffc increase, and the cost should be borne by the project. However, whether this project is implemented or not. Caltrans will continue ta make improvements at spot problem locatfons as they are identified and priorities for such projects allow.

Thank you for the opportunity to review this working paper.

Very truly yours.

Michael B. Parrier
Transportation Planner

MBP:ja
CC: MBP

249 MGP

STATE OF CALIFORNIA—TRANSPORTATION AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 12616, FRESNO 93778

December 28, 1984

Intergovernmental Review

Mr. Eugene E Smith, Director
Tulare County Building and Planning Department
Courthouse Rooms 105-111
Visalia, CA 93291

Dear Mr. Smith:

We have reviewed the Supplement to Final Environmental Impact Report (FEIR) prepared for the Foothill Growth Management Plan (FGMP) and offer the following:

> Our comments of June 19, 1984 and June 30, 1980 regarding FGMP are still valid. In our review re noticed that the supplement fails to address our concerns. Specifically, no mention is made of the mitigation measures to combat the impacts to State Highways (190, 198) in terms of overloading existing capacitfes as stated by the FEIR. Developers should contribute to highray improvements.

Thank you for the opportunity to comment on this important planning document.

Very truly yours,

ORIG SIGNED MOSES G. PACHECO

for N B. PARLIER
District 6 Transportation Planner

MGP:DH
CC: MBP
MGP

MGD
2491

STATE OF CALIFORNIA—TRANSPORTATION AGENCY

GEORGE DEUKMEJIAN Gov

DEPARTMENT OF TRANSPORTATION
P.O. BOX 12616, FRESNO 93778

November 5, 1984

6-Tul -190
USFS Peppermint Mtn. Resort

Mr. Jams Allen
Forest Engineer
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93297

Attention Hr. Darrel Cherry.
Special Projects Engineer

During the Draft Environmental Impact Report review process, we commented thrwgh the State Clearinghouse on some expected transportation impacts of the proposed Peppermint Mountain Resort. Due to time constraints, the analysis leading to those comments was necessarily very limited. Subsequently, re have fnvestlgated further the potential fmpacts of the proposal, particularly the recommended alternative.

Referring to the transportation analysis commencing on page 79 of the draft EIS, we concur that the fndicated routings 1, 2 and 5 will be the significant access corrfdors. However, we do not necessarily agree that Bakersfield and Los Angeles trafffc will confine their choice to your route 2. Yhen travel time on the valley floor (State Route 65) is added to your estimates, routes 1 and 2 are almost equal. And assuming that the major source of skiers will be the Southern California metropolitan area. f t appears to us that both routes 1 and 2 will he utilized by those visitors. Consequently. we have analyzed the impacts on State Route 65 also.

For purposes of thfs analysts. although your Table 111-3 (page 42) fndfcates approximately thirteen years to build out. re have considered full development impacts fn relation to our ten- and twenty-year (1994 and 2004) projections on the affected State highways.

The attached sketch and tabulated level-of-service chart shows the congestion levels expected with these assumptions. Although we may not have assigned the traffic between State Route 190 and County Road 56 in quite the same proportions as you are using. I think the fndicated congestion impacts (level of sevice) fs valid, particularly segments Y and YI.

Mr. James Allen
November 5. 1984
Page Two

It is understood that the peak traffic impacts generated by Peppermint will probably occur on only a few rfnter Sunday evenings, the number of instances depending on snow conditions. Generally thls does not conflict with the overall peak hours of travel because most highways have maximum volumes on mid-week days. In the case of State Route 65, there are several mid-winter Sunday evenings wfth peak travel volumes a about 85% of the mid-week peak hour. and re have used this value in our analysis.

Under some conditions, levels of sevice D and E might be acceptable; but given the length of the congestion (about 60 miles of D level at build out). re believe there will be consfderable public complaint. Because of our priority for maintaining the present system and the very limited amount of new facility funds, ve cannot encourage development projects that will undoubtedly lead to thfs kind of situation.

Although Caltrans will continue to make improvements at identified spot problem locatfons, significant improvement of level of service on State Rwte 65 means addltfonal lanes virtually throughout the study area, He have not made any engineered estimates for such improvement, but a cursory observation of the route fndfcates costs would be fn the range of $100 million. Because of the mountainous terrafn. similar improvement on State Route 190 would be even more expensive. Given the present outlook for future State (including Federal) Highway funds, such an ambitious program on State Rwte 65 and State Rcute 190 is unsupportable from Caltrans' perspective. Whether the Peppednt developuent could support costs of this magnitude, we don't know.

Thank you for the opportunity to add thfs information to your study.

M. B. PARLIER
District 6 Transportation Planner

MBP:ja
Attachment
CC: MBP
D.Cherry, USFS

MGP 249/

State of California

Business and Transportation Agency

Memorandum

Larry Wieman, Chief
Division of Transportation Planning

Attention Darrell Husum, A-95 Coordinator

Date: June 21, 1984

File: Tulare-General
SCH No. 80065251
Foothill Growth
Management Plan

From : DEPARTMENT OF TRANSPORTATION
Department of Transportation

Subject: Foothill Growth Management Plan

We have responded directly to Tulare County regarding Tulare County's Plan and Draft Environmental Impact Report on the Foothill Growth Management Plan.

Attached for *your* reference is a copy of the documents sent *to* Tulare County.

M. B. PARLIER
District Transportation Planner

MS:DH
Attachment
CC: MGP ✓

249/

Business and Transportation Agency

Memorandum

Orig routed to D. Husum DOTP.

To : Executive Officer
State Clearinghouse
1400 - 10th Street
Sacramento, CA 95814

Date: May 29, 1984

File: 6-Tul-190-56.6
SCH 84043006

From : DEPARTMENT OF
District 6

Planning (422-4128)

Subject: Peppermint Mountain Resort (DEIR) Draft Environmental Impact Report

Ye have reviewed the DEIR with a view to the impacts the project may have on State Route 190.

It appears that the peak hours of traffic are understated in Table Y-7 (page 139). State Highway 190 (Study Route 1) has a 1983 ADT of 3100 and a peak hour of 960 in the Springville area.

Ye feel that of the 3000 daily visitor vehicle trips 40% will use this (S.H. 190) corridor. This would produce 1200 auto trips in and 1200 auto trips out or an additional 2400 ADT on State Highway 190. Assuming a 2-1/2 hour peak period (as the study dws on page 139) an additional 480 (40% of outbound trips) could be anticipated on State Route 190.

In the Springville area this would give an ADT of 5500 and a peak hour of 1440. The current capacity of Highway 190, in the Springville area, is 1020.

Our ADT etimates and the Study ADT estfwates are fn the same general range. The breakdown appears to be in the development of peak hour estimates.

These comments have been aimed primarily at the Springville area. However. it should be understood that all of State Highway 190 from Springville to Quaking Aspen would have capacfty problems.

M. B. PARLIER
District Transportation Planner

RWT:ac

CC: MGP
RWT

STATE OF CALIFORNIA—TRANSPORTATION AGENCY

EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 12616, FRESNO 93778

MAD
2491

December 21. *1982*

06–Tu1-General
PZ 82-17
SCH 8212028

Mr. Eugene E. Smith, Director
Plannfng Department
County of Tulare
County Civic Center, Rooms 107-111
Visalia, CA 93291

Attention Josfe Domingo, Project Planner

We have no comnent on the third and final phase of a three part rezoning process implementing the Foothill Growth Management Plan.

Very truly yours.

[illegible] signed by
M. E. [illegible]

M. E. PARLIER
District 6 Transportatfan Planner

CAG:ac

CC: MAD
D. Husum, DOIP

PE MR 2491

Memorandum

To : Ms. Anne Barkley, Chief
Division of Transportation Planning

Attn: Darrell Husum, A-95 Coordinator

Date: June 30, 1980

File : Tulare General
SCH No. 80061251
Foothill Growth
Management Plan

From : DEPARTMENT OF TRANSPORTATION

Subject:

Following are our comments on Tulare County's Plan and Draft Environmental Impact Report on the Foothill Growth Management Plan, SCH No. 80061251.

In Sectfon VIII of the DEIR this plan recognizes its growth-inducing potential but the amount of growth is undetermined at this time, yet, in the plan section, Foothill Circulation Systems, fu states that the resulting traffic load should not unduly tax the foothill circulation system.

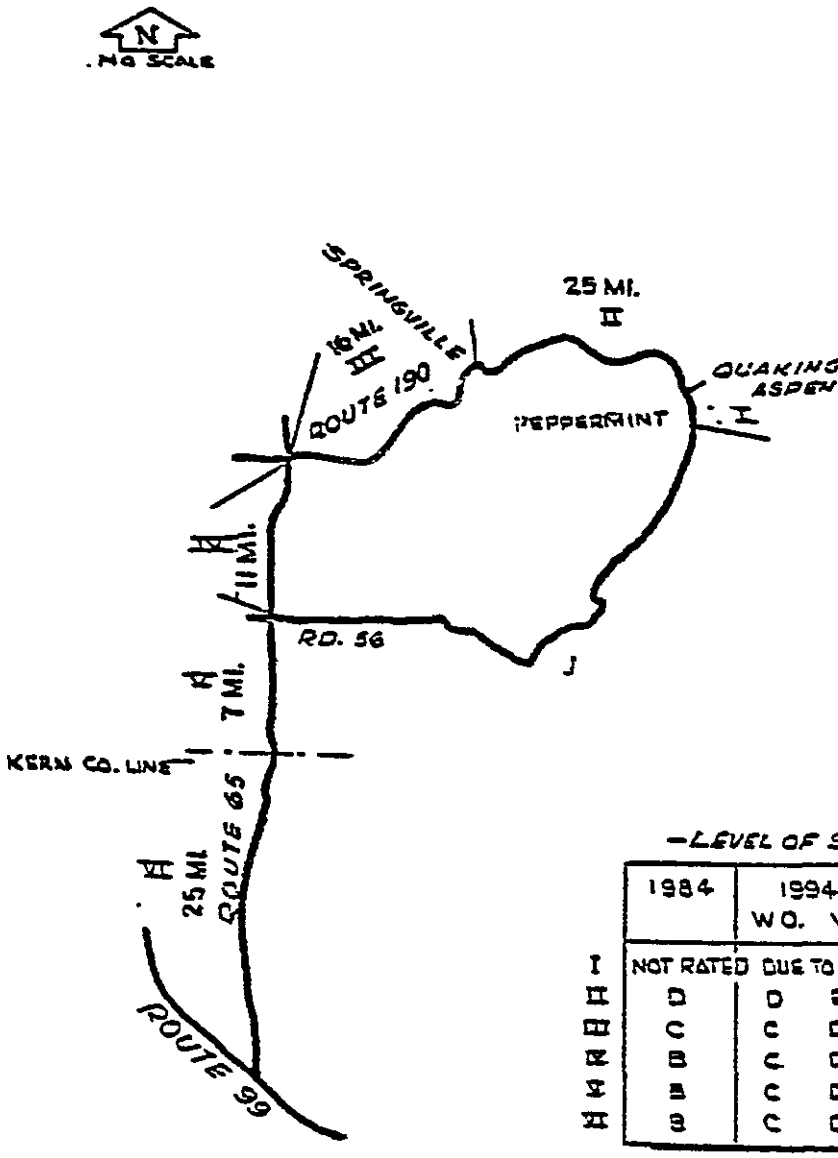
According to our most recent State Highway Inventory, the capacfty of State Highways 190 (South of the Tule Indian Reservation Road) and 198 (South of Three Rivers) wfll be reached if traffic volumes increased by 200% and 300% respectively on these highways. So the amount of growth may be constrained by the carrying capacity of the arterial system servfng tk plan areas. Ani the statement that "... there seems to be no necessity for any major expenditures for road improvements other than tk present ongoing program to widen certain road segments having substandard paving widths. seems to draw a conclusion that lacks substantive evidence.

There is no discussion in the Plan Section, Public Service Systems and Utilitfes. for highways ani roads. These are maintained and constructed by public agencies, State and County, and are essential features gfving vfabflfty to the plan itself. This section should include a realistic ffnancial outlook for public agencies in thefr attempt to cope with the fncreased growth in outlying areas such as proposed fn the foothfll management areas.

M. B. Parlier
District Transportation Planner

RMN:ac
cc:RMN
Attachment

2491



—LEVEL OF SERVICE—

	1984	1994 W.O.	1994 W.	2004 W.O.	2004 W.
I	NOT RATED DUE TO LOW DESIGN SPEED				
II	D	D	E	D	E
III	C	C	D	*C	**D
IV	B	C	D	#C	##D
V	B	C	D	C	E
VI	B	C	D	C	E

* URBAN PORTION (APPROX. 4 MI.) WOULD BE AT "D" LEVEL.

** URBAN PORTION (APPROX. 4 MI.) WOULD BE AT "E" LEVEL.

URBAN PORTION (APPROX. 2 MI.) WOULD BE AT "D" LEVEL.

URBAN PORTION (APPROX. 2 MI.) WOULD BE AT "E" LEVEL.

Department of Transportation:

Resolution:

1. As in the case of Peppermint, a separate project level EIS will be developed as each planned ski area is proposed for development. Each EIS would contain a detailed traffic analysis addressing cumulative impacts and, where appropriate, propose mitigations.

2. Sequoia National Forest met with State of California District 6 transportation planners on November 21, 1986, to discuss concerns relating to logging roads intersecting State routes. At this meeting, the Forest Service agreed to improve pavement flare and drainage design at intersections. Operation of "lunch wagons" on Highway 178 is not authorized by any Forest Service permit and so is illegal under Forest Service regulations. We are unaware of this problem.

3. Specific mitigations will be developed for site-specific projects. This will occur as land use developments are proposed and analyzed. The Forest Plan will be revised every 10-15 years providing an opportunity to reevaluate traffic growth.

2520

STATE OF CALIFORNIA GEORGE DEUKMEJIAN Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
CENTRAL VALLEY REGION

SANJOAQUIN WATERSHEDBRANCH OFFICE
3614 EAST ASHLAN AVENUE
FRESNO CALIFORNIA 93726
PHONE 120914455115

24 April 1986

Mr. Jim Crates
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257-2035

DRAFT LAND AND RESOURCE MANAGEMENT PLAN (LRMP) AND DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS), SEQUOIA NATIONAL FOREST, FILE 1920

We have reviewed the subject documents and have developed the enclosed comments.

The draft EIS generally discusses the potential impacts to water resources from the proposed LRMP. However, we request that you address the following issues in greater detail:

1- 1. Cumulative impacts to water quality from increased use of the Forest.

2- 2. The Forest Service's proposals for surface water quality monitoring for identification and mitigation of pollution sources.

3- 3. Characterization of ground water resources (quantity and quality) that should be protected in the Forest.

Please address the above in your final EIS.

If you have any questions, please call Timothy G. Souther of this office at (209)445-5525.

SARGEANT J. GREEN
Senior Land and
Water Use Analyst

TGS:hmm

Enclosure

cc: Mr. Jerry Bruns, California Regional Water Quality Control Board, Sacramento

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Memorandum

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD • CENTRAL VALLEY REGION
3514 E Ashlan
Fresno. CA 93726-6905
SAN JOAQUIN WATERSHED BRANCH
Telephone (209) 445-5116
Stare Lease Line 421-5116

TO Sargeant J. Green
Senior Land and
Water Use Analyst

FROM Timothy G Souther
Staff Environmental

DATE 23 April 1986

SIGNATURE

SUBJECT UNITED STATES FOREST SERVICE, SEQUOIA NATIONAL FOREST, DRAFT LAND AND RESOURCE MANAGEMENT PLAN (LRMP) AND DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS). THEIR FILE 1920

I have reviewed the LRMP and DEIS and have developed the following comments.

1. The vision statement in the LRMP indicated the intent of the plan was "to provide increased public benefits by increasing recreational opportunities, development of trailhead facilities, providing increased opportunities for off-highway recreation, providing increased white water rafting opportunities, providing downhill skiing opportunities and improve access to giant sequoia groves for increased recreational opportunities." These activities will increase the burden on existing water supplies and waste management facilities (sewage, solid waste and possibly hazardous waste treatment and disposal facilities). The LRMP indicates acditional such facilities will be necessary to accommodate those increased uses. Waste management practices are to be developed utilizing identified Best Management Practices (BMP's) to minimize non-point source impacts to water quality and quantity. The cumulative impacts of increased use of existing facilities and development of new point source facilities and non-point source activities could still pose a significant threat to water quality and beneficial uses of surface and ground water. Such Impacts are not adequately addressed in the LRMP.

2. The LRMP finds that, "There will be more evidence of landslides in steep terrain accessed and harvested for timber. There will be more evidence of erosion from off-highway vehicle use in some locations and there wlll be more areas where the soil has been bared for reforestation activitics." The above could cause sedimentation of surface waters and impacts to fresh water fisheries and other downstream uses of water. Again, BMP's are proposed to be implemented to minimize impacts to water quality. However. the cumulative impacts from increased off-highway vehicle use and timber harvesting need to be fully evaluated.

3. The DEIS infdcates that "past (surface water) monitoring has shown that water on the Forest has been of good quality for the beneficial uses ... except for short term high bacteria and sediment concentrations." This statement indicates the need to address cumulative impacts to surface water

Reviewed by

from increase forest use and the need for a surface water quality monitoring program. The DEIS should address how monitoring might assist in identifying surface water quality impacts and their sources mitigated. The "Research Needs and Technical Planning Needs" (Appendix B) includes a determination of "the relationship of management practices to water quality, meadow gullying and cumulative watershed impacts in the Southern Sierra Nevada." Appendix B recognzied the surface water monitoring need, however, the LRMP does not detail such a program as part of the plan.

4. The DEIS indicates "No attempt has been made to inventory or map ground water availability or quality." It also suggests that "A ground water inventory [as part of a Geologic Resources Inventory) would provice better
3- estimates of water availability and the cost of development." Ground water quality, as well as ground water occurrence, Should be addressed in the DEIS. Since ground water is a significant source of drinking water in some areas of the Forest and a potential water supply for proposed facilities, its quality should be determined and protected. However, it should be recognized that the Sequoia National Forest is a rather complex hydrogeologic system, that may not lend itself to easy characterization. In any case, the ground water resources should be identified so they can be protected.

CONCLUSIONS:

We should request the U. S. Forest Service to address cumulative impacts to water quality from increased use of the forest, surface rater quality monitoring for identification of pollution sources and characterization of ground water measures (quantity and quality) that should be protected in the Sequoia National Forest LRMP and DEIS.

TGS:hmm

California Regional Water Quality Control Board - Central Valley Region

Resolution:

1. In the Final Forest Plan the monitoring section includes an evaluation of soil productivity and water quality against accepted standards on a watershed basis utilizing cumulative watershed impact analysis.

2. The Final Forest Plan identifies a program in its monitoring section that will assure that project activities provide for protection of meadows, riparian ecosystems and associated values through validating the application of BMP's. This program along with the monitoring stated in the above paragraph addresses surface water quality impacts and their mitigation.

3. Ground water resources on the Sequoia National Forest are investigated on a very site specific basis. The cost of drilling prohibits extensive inventories.

2758

BOARD of SUPERVISORS

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CLYDE R GOULD
District One

Vice Chairman
BEN E WEBB
District Five

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District Two

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District Three

3- LEROY SWINEY
District Four

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JOHN C McCLURE II
County Executive/
Clerk of the Board

GEORGIA SOUZA
Chief Clerk

ADMINISTRATION BUILDING
COUNTY CIVIC CENTER
2800 WEST BURREL
VISALIA, CA 93291

(209) 733-6271

April 28, 1986

Mr James Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

RE: Proposed Sequoia National Forest Land and Resource Management Plan and Draft Environmental Impact Statement

Dear Mr Crates:

The Tulare County Board of Supervisors has reviewed the proposed Forest Plan and after hearing from Forest Service staff and members of the general public, has taken a position supporting the High Market Alternattve (MKT) We do, however, take exception to that portion of the alternative that recommends 9,710 acres of additional wilderness in the Kennedy Meadow area of Tulare Count)

It is this Board's position that the High Market alternative best meets the needs of Tulare County citizens in that it presents a balanced approach to forest management while emphasizing timber yield. An approach incorporating these two elements is consistent with the County's General Plan and will assure compatibility between Forest Service planning and local planning

As you know, agriculture and related industries are the primary component of the County's economic base and a substantial number of Jobs are related to the the harvest and processing of timber. At the same time the County recognizes the importance of recreation related development as well as the need to carry out forest management in a way that is not detrimental to the long term preservation of the environment.

Tulare County opposes the designation of additional wilderness within its forest lands for the reason that approximately 25% of such lands are already designated for wilderness use. We believe this is more than Tulare County's fair share. It is also our position that limiting land to wilderness use harms the local economy and limits choice in the future This Board has consistently opposed wilderness designations and will continue to oppose them in the future

In summary, the High Market alternative will best serve the needs of Tulare County during the planning period and we urge its adoption. Thank you for the opportunity to participate in the review of the Forest Plan and to offer our comments.

Sincerely,

TULARE COUNTY BOARD OF SUPERVISORS

Clyde R Gould

Clyde R Gould, Chairman

Tulare County Board of Supervisors

Resolution:

1. Under the Preferred Alternative (PRF), 12,500 acres of the 35,600-acre Rockhouse WSA will be proposed for wilderness. This is the only area recommended for wilderness in the Plan. This addition should help to improve the manageability of the existing Dome Land Wilderness. It also has the least impact on private land inholdings and mining activities.

2. The importance of the forest products industry to the economy of Tulare County was taken into consideration when the Allowable Sale Quantity (ASQ) was recommended. It appeared essential to set the ASQ near the current level in order to maintain this portion of the economic base.

3. The current ASQ is 95 MMBF. The actual average harvest for the past 27 years (1960-1986) has averaged 92 MMBF. The range of harvest for the decade 1977-1986 was 57 MMBF to 125 MMBF. The recommended annual harvest is 101.6 MMBF (ASQ of 97 MMBF of green timber and 4.6 MMBF salvage) is. therefore, responsive to this concern. The ASQ will allow the continued balance of multiple uses that have existed while maintaining a viable forest industry and healthy economy in Tulare County.

C. Brent Wallace
Clerk to the Board

1948

(619) 878-1411

2

COUNTY OF INYO
BOARD OF SUPERVISORS
P O DRAWER N
INDEPENDENCE, CALIFORNIA 93526

13-2-000021-0

April 21. 1986

Mr. Zane Smith
U.S. Forest Service
630 Sansome Street
San Francisco, CA 94111

Dear Mr. Smith:

Enclosed for your information is a copy of Resolution No. 86-25 which was adopted by the Inyo County Board of Supervisors on April 15, 1986 expressing support for a Forest Land Management Plan for the Sequoia National Forest.

Thank you,

Kelli Lanshaw

Kelli Lanshaw,
Deputy Clerk of the Board

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RESOLUTION NO. 86-25

A RESOLUTION OF THE INYO COUNTY BOARD OF SUPERVISORS IN SUPPORT OF A FOREST LAND MANAGEMENT PLAN FOR THE SEQUOIA NATIONAL FOREST

WHEREAS, the U.S. Forest Service is in the process of preparing land and resource management plans which will guide the management of the Sequoia National Forest for the next ten years; and,

WHEREAS, Inyo County will be directly affected by this Land Management Plan; and,

WHEREAS, no analysis has been made concerning the effects, detrimental or otherwise, on how this Land Management Plan will affect Inyo County; and,

WHEREAS, the harvest of Forest Service timber provides not only direct jobs for the people of Inyo County, but also results in business "payables" and "receivables"; and,

WHEREAS, Louisiana-Pacific Corporation's sawmill operations in Inyo County provide thousands of dollars in tax income; and,

WHEREAS, the harvest of Forest Service timber produces hard cash revenues which in turn result in direct payments to county school and road programs; and,

WHEREAS, Inyo County has a keen interest in maximizing these Forest Reserve Funds to counties dependent on them; and,

WHEREAS, any reduction of timber harvest activities will adversely impact the level of these payments; and,

WHEREAS, timber harvests conducted in a scientifically sound program benefit the ocher resources of water, wildlife habitat, forage, and recreation and provide access for protection of the forest from fire, insects and disease.

RESOLUTION NO. 86-25

NOW, THEREFORE, BE IT RESOLVED that the Inyo County Board of Supervisors recognizing the many positive benefits that flow from balanced timber management programs, and in support of revenue enhancing federal programs, hereby Supports a Forest Land Management Plan for the Sequoia National Forest that maximizes timber harvest within sound multiple use principles.

BE IT FURTHER RESOLVED that, since timber harvest provides positive revenues and therefore supports the federal policies of balanced budgets and reduced deficits, the Inyo County Board of Supervisors supports federal budget allocations in an amount necessary to realize the planned levels of production.

PASSED AND ADOPTED this 15th day of April, 1986, by the following vote:

AYES: Supervisors Irwin, Johnson, Calkins, Bremmer & Campbell
NOES: None
ABSENT: None

ATTEST: C. BRENT WALLACE,
Clerk Of the Board

By Kelli Ranshaw
Deputy

THIS RESOLUTION ALSO READ BY ROBERT BREMMER
SUPERVISOR 5TH DISTRICT
INYO COUNTY

AT THE KERNVILLE PUBLIC HEARING
FOR THIS LAND MANAGEMENT PLAN

1948

ROBERT "BOB" BREMMER
SUPERVISOR 5TH DISTRICT

RESIDENCE
BOX 275
LONE PINE CA 93545
(619) 876-4365

COURTHOUSE
DRAWER K
INDEPENDENCE CA 93526
(619) 878-2411

Inyo County Board of Supervisors

Resolution:

1. Under the Preferred Alternative (PRF), 12,500 acres of the 35,600-acre Rockhouse WSA will be proposed for wilderness. This is the only area recommended for wilderness in the Plan. This addition should help to improve the manageability of the existing Dome Land Wilderness. It also has the least impact on private land holdings and mining activities.

2. and 3.
The Sequoia National Forest timber sale program now has only minor economic impact on Inyo and Kern Counties east of the Kern Plateau since closure of the Louisiana-Pacific Mill at Inyokern in October 1987.

8019

County of FRESNO

Public Works & Development Services Department

Richard O Welton
Director

April 30, 1986

Forest Supervisor
Seauoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Gear Sir:

Subject: Sequoia National Forest Draft Enviromnental Impact Statement

The Fresno County Public Works ana Development Services Department has reviewed the above referenced documents and has the following comments to offer.

These comments address the preferred alternative plan prepared by the U. S. Forest Service for the Seauoia National Forest. It does not address the other nine (9) alternatives, except by comparison with the current management plan alternative.

The major transportation effect in Fresno County will be on State Highway 180 with lesser impacts on State Highway 245. These routes are the major access to the Hume Lake District of the Seauoia National Forest. Over two-thirds of the Hume Lake District is in Fresno County, for a total of 134,285 acres or about 210 square miles. The Hume Lake District also surrounds the Grant Grove section of Seauoia National Park and contains the Fresno County communities of Hume Lake and Pinehurst.

The predominant uses of the National Forest are outdoor recreation and timber harvesting. Since the nearest sawmill to the Hume Lake District is between Reedley and Oinuba, much of the truck traffic generated by timbering will use Highway 180 as well as other County roads, such as Cove, American, and Alta Avenues. Timber production is planned to be stable at about 30 million board feet per year in the Hume Lake District. The proposed timbering activity appears to be slightly higher than is currently practiced.

One planned development that will increase the traffic is the development of a ski area called Mitchell-Maddox. This ski area is projected to support 10,335 skiers at one time, on a 3,000 acre site. Although only partially situated in Fresno County, primary access to the site is from State Highways 180 and 245 through Fresno County. Other County roads that feed into those two State Routes should also experience increased traffic volumes. Horse Corral Road is the only Forest Service road that may require widening as a conseauence of the ski area development. This road begins at Highway 198 in Tulare County, south of Giant Forest/Grant Grove and terminates near the site of the proposed Mitchell-Maddox ski area in Fresno County. me development of the Mitchell-Maddox ski area is not a change from the present recreation management direction.

4499 East Kings Canyon Road/Fresno, California 93702/Phone (209) 453-5055
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8019

The draft EIS does not directly address the issue of vehicle traffic generated by Its preferred plan or the alternatives. However, inference can be drawn that traffic will increase in direct proportion to the increase in recreation visitor days per year, millions of board feet of timer offered for sale and cords of firewood produced. me draft EIS should provide information on how the alternatives will affect traffic on the major highway routes serving the National Forest.

Furthermore, one has to assume that the proportion of total National Forest traffic impacting Fresno County would reflect the proportion of either the National Forest area in Fresno County (12%) or of National Forest in the Hume Lake District, which is about 20%. Increases in use over that experienced in 1982 are projected for both the preferred alternative ana the current practices alternative for the traffic generating recreation, timbering, and firewood activities as follows:

Base Year (1982)

2,529,500 developed public and private, dispersed and wilderness recreation visitor days per year
97 million board feet of timber sales offered **per** year
20,000 cords *of* firewood produced per year

Preferred Alternative by Decade with Percent Increase Over Base Year

	Decade 1	Decade 2	Decade 3	Decade 4	Decade 5
Recreation	3,164,700 (25)	3,523,900 (39)	3,890,600 (54)	4,555,900 (80)	5,230,300(107)
Timber	104 (7)	120 (24)	136 (40)	136 (40)	136 (40)
Firewood	21,500 (7.5)	24,800 (24)	28,300 (41.5)	28,300 (41.5)	28,300 (41.5)

Current Practices Alternative

Recreation	2,954,700 (17)	2,998,900 (19)	3,215,000 (27)	3,416,500 (35)	3,568,700 (41)
Timber	97 (0)	97 (0)	97 (0)	101 (4)	101 (4)
Firewood	20,000 (0)	20,000 (0)	20,000 (0)	21,000 (5)	21,000 (5)

Thus, recreation traffic unaer the preferred alternative during the first decade will be 25% higher per year than was experienced in 1982, and over twice as much each year in the fifth decaae of the Plan. Correspondingly, timber and firewood traffic will increase 7% and 7.5% respectively in the first decade ana 40% and 41.5% in the fifth decade.

To the extent that Highway 180 is a major route to the Hume Lake District of the Sequoia National Forest, the provisions Of the County's General Plan Scenic Highway Policy should be supported. This appears to be the case from statements about the preferred alternative, that a near natural appearance with in the foreground views of the more heavily traveled routes should be maintained, ana that the visual duality objective for Highway 180 is retention of current ouality in the foreground and partial retention in the middleground. Also, the preferred alternative proposes that a new corridor viewshed plan for Highway 180 will be prepared. me decline in visual ouality is 1% greater under the preferred alternative than would occur under the current management praftices alternative.

-2-

8019

If you have any questions relating to our comments, please direct them to Richard Braun, at (209) 453-5010. Thank you for the opportunity to review your Plan and EIS.

Very truly yours,

Jerry K. Boren
Development Services Manager

Katie Bearden

Katie Bearden
Staff Analyst III

KB:mar
4123B

cc: Council of Fresno County Governments

Fresno County - Public Works and Development Services Department

Resolution:

1. The Final EIS does include a discussion of traffic growth for each alternative in Chapter 4, Section B, Facilities. The data for this discussion was generated utilizing traffic growth as related to recreation and timber management along with new roads constructed and amount of road closures. Sequoia National Forest recognizes that Highway 180 is an eligible Scenic Highway in the California Scenic Highway Master Plan and will be managed in support of that classification.

706

County of
FRESNO

Parks Division

March 4, 1986

RE: Sequoia National Forest
Land & Resource Mgt Plan
OEIS

United States Department of
Agriculture, Forest Service
900 West Grand Avenue
Porterville, CA 93257-2035

Dear Mr. Crates:

Enclosed you will find comments from the Fresno County Recreation and Wildlife Commission on the Sequoia National Forest Land and Resource Management Plan.

We thank you for the opportunity to review and make comments on the plan.

Sincerely,

Oale Tartaglia

Oale Tartaglia
Chairman

DT:KT:lc

Enclosure

4300a

2220 Tulare Street 8th Floor/Fresno California 93721/(209) 488 3004
Equal Employment Opportunity — Affirmative Action — Handicap Employer

MARCH 4, 1986

U.S.D.A. Forest Service
900 West Grand Avenue
Porterville, **CA 93257**

Sequoia Forest, Draft Land Management Plan

We have studied the documents and find them very confusing. The **112** acronyms that are used to describe, refer to, compare mth and relate to, seemed to be carrying the use of acronyms a httle beyond the extreme.
1- It seemed that there were enough contradictions, over-lapping of management goals, inaccurate statements and vague statements **SO** that future management decisions could probably be made to satisfy most management desires.

We had hoped that a sound management plan would encompass the
1- multiple use management and benefits that we have heard referred to in recent years. However, as we read the document it became increasingly evident that the primary emphasis is still on timber and range. **You** state: (page **2-16)** that water yield and recreation contribute 80% of the total present net value (PNV), with timber adding **19%** and livestock forage only **1%.** Our primary concern is mth the fish and wildlife resources of the Sequoia forest. Again and again in all of the alternabves we find plans that will be damaging to wildlife and only minor benefits.

Some of the proposals that were particularly disturbing to us were:
2- (1) Increased cattle A.U.M.'s
We feel that there is already heavy cattle use in much of the Sequoia Forest. That wet meadows are not being properly protected. That allowing cattle to reduce the grass to **400** lbs. per acre is not adnsable. Especially when most cattle will lose weight when the available forage is down to 500 **lbs** per acre. We feel that the price (per A. U M.) for cattle to graze the National Forest should be set at the fair market value. Since only **2%** of the nations beef is partially produced on Forest Service lands, the current low price is an unfair subsidy granted to less that 2% of the nations cattle producers. We feel that the figures used and the **1982** base year are very misleading when applied to the proposed A. U. M. increase to **90,000** A. U. **M.'s** In **1979** the A. U. M. 's were 44.000 an increase from the **1979** use to the proposed **90,000** is over **100%** increase. We feel that there should be no proposed increase and that cattle use of the National Forest lands should reflect a gradual decrease.
(2) Timber production
3- We feel that as custodians of our National Forests, that you should be seeking ways to conserve this very valuable resource. But your alternatives are all designed to exploit our forests to the maximum possible. We do not feel that the maximizing of timber production is in the best interests of

the people of the United States. The conversion of 300,000 acres to clear cut plats over the period of the proposed plan will have a very detrimental effect on most wildlife species. We are aware that there will be short periods in the production stages of each plot when there will be wildlife benefits, however the wildlife losses from the proposed plan will vastly outweigh the benefits and reduced numbers of wildlife will result from such action.

The removal of thousands of tons of forest products - plus the proposed removal of limbs, snags and underbrush for conversion by biomass processmg. will constitute a heavy drain on the soil nutrients of the forests. Farmers can't continue to depleat their soil without putting some nutrients back and we don't feel that the Sequoia Forest can either. This aspect is given no considerahon in any of the alternatives.

The heavy use of lumber in construction is not essential to the natrons progress. Most other developed nations use far less lumber than is used by the U.S. construchon industry. There are other construction materials.

4- (3) Wildhfe

In the past 100 years almost 90% of our prime mldhfe habitat has been destroyed to meet the need for farm land, urban development, industry, roads and other people-related-projects. The federal lands of the Umted States now constrtute the most valuable remaining areas of mldkfe habitat. The people of the Umted States have mandated that forest management shall preserve and enhance mldhfe habitat - however, in reading your DEIS we note:

(a) No consideration for meadows less than 2 acres in size.

(b) The comfer prescription calls for maximizing of conifer production regardless of mldkfe habitat requirements.

(c) You propose the use of kvestock to reduce vegetation in new hmber stands. This is the same deer habit that you proudly proclaim will result from clear-cuts.

(d) There is no retention standards for kveeak areas. All acorns are vital to the mldkfe commumty.

(e) Black oak stands are scheduled for drastic reduction. The method of determining basal area of black oaks remaining in a tract, mll not provide a satisfactory distribution of oaks.

(f) Under present grazing practices - blue oaks cannot produce any young trees. Tne blue oaks on the Sequoia Forest should be listed as endangered.

(g) Tne proposed large increases in cattle on the lower elevation blue oak savannah areas will cause increased loss of grass, forbs and herbaceous forage in these areas of critical winter deer range.

5- (4) Fishery Resource

(a) Under the preferred alternative - there is no provision for enhancement of fish habitat.

(b) Increased road construction, logging, chapparal conversion and increased cattle number will contribute to a deckne in the current fishery habitat.

(c) With a projected 125% increase in the number of people seeking a satisfying fishing experience - how can your preferred plan not include

(Sequoia Forest, Draft Land Management Plan - continued)

provisions for the enhancement of the fishery?

(d) Vague statements calling for "increased wildlife and fish habitat capabilities on the National Forest by 1995" - Don't mean anything without a definite plan for achieving such goals. No plan is presented.

(e) Page 2-69 table 2.6 yon list your proposed direct habitat improvement for fish as zero. This seems to closely reflect your concern for the fishery.

(f) Pages 4-65 and 4-66 reference is to: meehng the basic demands for recreation use on the Sequoia Forest. Needs of campers. skiers, OHV needs and other recreational pursuits are detailed but fishing as a form of recreahon is not even menhoned.

Summary:

In our opinion most of the alternahves were only confusing to the primary issue of developing a sound management plan for the Sequoia National Forest. In consideration of the political and financial constraint that the forest must operate under - only some modified version of the "Preferred Plan" is hkely to be adopted.

From a wildlife standpoint - none of the plans are acceptable. On page 18 of your summary section - under wildlife - you have predicted the potential losses or gains in the three types of habitat needed by wildlife. Eight of the alternahves would result in a net habitat loss varying from a 10% loss to a 46% loss. Only two, Alt. WVF showed a possible 1% gam and Alt. AMN indicated a possible 11% increase in available habitat. Adoption of either Alt. WVF or Alt. AMN have about as much chance of adophon as the proverbial snowball in _____.

For 100 years the people of the United States have newed with dismay the increased losses of our mldhfe habitat. To have a Federal Agency - plan for increased losses is completely unacceptable. We sincerely urge that your staff closely examine the many comments relative to your proposed plans and that the "Preferred Plan" be rensed to more closely meet the needs and desires of the real owners of the Sequoia Forest - The American People.

Fresno County Parks Division

Resolution:

1. Thank you for your comments on the Sequoia National Forest's Draft Land Management Plan (LMP) and Draft Environmental Impact Statement (DEIS). We apologize if your agency found the Plan and DEIS confusing. The complexity of the documents reflect the enormous job of planning the management of resources on over 1 million acres of public lands. This management includes providing goods and services, meeting public demands, protecting Forest resources, and complying with legislative and political requirements over an extended period of time. The Table of Contents, Glossary (Appendix J) and Acronym Definitions (Appendix I) have all been included in the DEIS to hopefully clear up some of this confusion and complexity for the reader.

   In general, it may seem an inordinate amount of text was devoted to timber; and to a lesser degree, range management elements of the documents. Since these two programs (and Recreation Management) have the greatest potential for affecting Forest resources, the planners felt describing the affects and details of these programs was essential.

   In the Final Plan, you will find increased explanation of fish and wildlife management. Also, with the implementation of the Plan, the Forest will have stronger, more effective Standards and Guidelines providing for the protection and enhancement of fish and wildlife habitat.

2. Range

   The increases in livestock numbers proposed in the DEIS and Draft Land Management Plan were based on the 1982 RPA study. This study indicated beef consumption was expected to increase throughout the planning period. The President's statement of policy (3/30/81) directed National Forests to meet their proportionate share of increased demand for range grazing (46% increase by 2030). This increase in demand did not materialize. Beef consumption has declined since that time. Present information indicates this decline may be leveling off. The Preferred Alternative for the Final Land Management Plan holds livestock numbers constant with the 1986 levels for the Forest (66,000 AUM's of term grazing permits plus 5,000 AUM's for recreation stock and temporary grazing permits based on favorable forage conditions). Local adjustments will be made based on fluctuations in forage conditions. Management emphasis will be based on ecological principles aimed at reducing conflicts with other resources and uses. Conflicts will be addressed on a case-by-case basis using applicable research as it becomes available.

3. Timber

   A. The alternatives described in the Draft LMP and EIS provide for a range of goods and services (including timber) to be harvested from the Forest. No alternatives, with the possible exceptions of

the High Market Emphasis Alternative and the High Production Emphasis Alternative, maximize timber production on Sequoia N.F. No alternative described in the documents maximize timber prodution at the cost of forsaking all other resources. The Forest has attempted, in the LMP, to balance timber production with other uses on the Forest including wildlife habitat management. Productive timberland is being managed emphasizing uses other than timber management on over 50 percent of the 656,000 acres capable of producing timber. This includes timber in wilderness, along travel influence zones, along streams, on erosive soils, around recreational areas, and in important viewsheds. Also, although the Draft LMP proposes the harvesting of overmature (old growth) stands on the Forest, there are provisions to protect a portion of this valuable wildlife habitat type. Old growth located in the wilderness will be protected. Five percent of the old growth in each timber compartment will be retained. Approximately 40 spotted owl habitat areas, each 1,650 acres in size, will be protected providing another 50,500 acres of old growth distributed across the Forest. The old growth found in the four Research Natural Areas and six Botanical Areas will be preserved. Finally, many acres of old growth will be left in areas that are not economical to harvest timber because of road construction costs or other limiting factors.

B. Where harvesting occurs, trees will be removed, representing a loss of biomass on the site. Limbs and branches of the trees, underbrush, residual trees, and Forest ground cover/litter will be left on site. These components of the site will either remain as is to decompose naturally or will be burned to prepare the site for planting. Either way, nutrient recycling is occurring on site.

C. The Sequoia National Forest has little or no control over what types of materials, or the amount of materials, are used by the U.S. construction industry.

4. Wildlife

The National Forest Management Act requires that this plan shall "provide for multiple use and sustained yield of goods and services from the Forest in a way that maximizes long-term net public benefits in an environmentally sound manner." This direction precludes the possibility of preserving the entire Forest for wildlife habitat regardless of what the people of the United States have done to the rest of the wildlife habitat in the country.

Also, the Final Land Management Plan actually provides for increased protection and management of several important habitat types including old growth, riparian, dead and down trees, snags and hardwood, habitats. Please refer to the revised Forest-wide Standards and Guidelines in Chapter 4 of the Plan.

A. The minimum size limit of meadows (two acres in the Draft Plan) requiring protection or management considerations has been revised to include all meadows, regardless of size.

B. The Management Area Prescription (CF7) emphasizing the production of saw timber volume in the conifer zone is subject to the same, or more stringent, Wildlife Standards and Guidelines established for every management area prescription. Also, please see the revisions to this Management Area Prescription in Chapter 4 of the Plan for the additional Fish and Wildlife Standards and Guidelines that have been added.

C. Both cattle and deer utilize the forage created by even-aged harvesting of timber. Currently, the permitted cattle and the deer found on the Forest, combined, utilize all the vegetation found in plantations. Forage on summer range does not appear to be limiting.

D. The Management Direction in Chapter 4 of the Final Plan prescribes maintaining mast producing *oaks* on Capable, Available, and Suitable timberland in numbers proportional to the current inventory. Where hardwoods and conifers coexist, the goal is to increase conifers subject to leaving at least a minimum of 20 square feet per acre basal area of *oak* hardwoods dispersed over each timber compartment. This includes live *oak*.

E. Please see response to D above.

F. Blue *oak* habitat surrounds the Central Valley and occupies lands throughout most of California. Many studies have focused on factors relating to the non-regeneration of blue *oak*. Fungus in the north part of the state, persistent drought years in the south, and cattle grazing in general have been blamed for the lack of regeneration of blue *oak* stands. There is no unanimous agreement in the scientific community supporting the argument that cattle grazing is endangering blue *oak* stands. Locally, studies conducted on the Sequoia National Forest and Sequoia National Park have shown that in some cases blue *oak* stands under grazed situations (on the Forest) are regenerating while stands not being grazed were not regenerating. It is apparent more studies need to be conducted to establish the true causes of non-regeneration of blue *oak* in specific locations. Only then can management direction be formulated to provide for regeneration of this species.

G. The Final LMP prescribes minor increases in grazing over time on the annual grass ranges found in the foothills. Little or no expansion of cattle numbers or season of use are expected on the Forest in the near future due to the depressed condition of the cattle industry and lower market demand.

5. Fishery Resource

A. Please see the revisions in Chapter 3 in the Final Plan discussing the types of activities proposed to provide for the enhancement and/or protection of fish habitat.

B. The use of Best Management Practices, Riparian Management Guidelines, and limited improvement projects should maintain current fishery habitat. Also, mitigation measures identified in the Environmental Assessment for individual projects will insure protection of fish habitat.

C. See response to 5A.

D. The Land Management Plan clearly outlines our commitment and describes the planned management direction in providing for the maintenance or improvement of fish and wildlife habitat over time. The vague statements alluded to in your comment come directly from the Resource Planning Act, formulated by the U.S. Congress, calling for increased wildlife and fish habitat on the National Forests by 1995.

E. Funding for direct fisheries habitat improvement is severely limited. The return in increased production per unit of investment in fisheries habitat improvement is very low. Generally, this kind of major investment is channeled towards coastal anadromous fisheries where a higher return and greater public benefit can be realized. Through the use of Best Management Practices, Riparian Guidelines, and mitigation measures, the Forest can protect the existing fisheries. Some localized improvements will be seen through KV funds (timber sale area improvement money), fines money, cooperative work with the California Department of Fish and Game, local volunteer projects, and watershed restoration programs primarily directed towards meadow stabilization.

F. A detailed explanation of the fisheries resources and public demand implications on Sequoia NF is provided in Chapter 3 of the Plan.

SUMMARY RESPONSE

The Final LMP has undergone extensive revisions, particularly to the wildlife and recreation portions of the plan. These revisions are in response to the approximate 3000 comments received from the public and other agencies.

2681

BOARD OF SUPERVISORS

SUPERVISORS
ROY A. ASHBURN District No 1
BEN AUSTIN District No. 2
PAULINE LARWOOD District No. 3
TRICE HARVEY District No. 4
MARY K. SHELL District No. 5

SHARON CLARK
Clerk of Board of Supervisors
Administration and Courts Building
1415 Truxtun Avenue
Room 500
Bakersfield, California 93301
Telephone (805) 861-2167

April 28, 1986

Mr. James A. Crates, Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Re: Comments regarding Draft "Sequoia National Forest Land and Resource Plan"

Dear Mr. Crates.

The Kern County Board of Supervisors would like to take this opportunity to comment on the draft "Sequoia National Forest Land and Resource Management Plan." In addition, this Board appreciates the coordination the Forest Service has provided with Kern County during the preparation of this plan.

The Forest Service is to be commended on drafting a plan that provides for future development of additional recreational opportunities. As you are aware, Kern County is experiencing quite rapid growth at this time, and it is this Board's opinion that the draft plan will help to satisfy the future demands for recreation in Kern County.

The largest part of Sequoia National Forest is located within both Kern and Tulare Counties, while a remaining small portion is located in Fresno County. The Forest's immediate sphere of influence is considered to be both Kern and Tulare Counties. This means that any impacts, whether they be physical or socio-economic, which may be created by adoption of a land and resource management plan, will be noticed to the greatest extent in these two counties.

The DEIS outlines a number of management alternatives, each with a different emphasis, resulting in various management levels that are further analyzed with regard to ten Forest issues. In each case, a preferred alternative is identified. The actual draft plan is a detailed incorporation of the preferred alternatives for each Forest issue. The resulting emphasis of the plan is timber harvest, dispersed recreation, and ski area development.

1- Kern County supports the concept of developing a management plan for Sequoia National Forest. However, for such a plan to be effective, it is paramount that old impacts, both physical and socio-economic, be identified and considered. After review of both the DEIS and the draft plan, it is the Kern County Board of Supervisors' concern that the socio-economic impacts be thoroughly identified in the DEIS and be considered in the draft plan. While

1- the plan establishes a theme centered amund timber harvest, dispersed recreation, and developed ski areas, it is of vital importance to Kern County to be aware of the impacts that these may have on our communities, schools, roads, and other County services. Although not considered a theme in the draft plan, it is also of the utmost importance and of concern to this Board that the socio-economic impacts created from the management of grazing activities and mining operations be thomughly addressed.

Once again, thank you for this opportunity for comment on the Draft "Sequoia National Forest Land and Resource Management Plan" and for the coordination the Forest Service has provided with Kern County.

Very truly yours,

TRICE HARVEY, Chairman
Kern County Board of Supervisors

RLA GAB:jrw:slb

Kern County Board of Supervisors

Resolution:

1. Socioeconomic effects of all alternatives, including the Preferred Alternative are fully discussed in Chapter 4.B.1 of the FEIS. They are not included in the Plan because the Plan is meant to set forth actions and standards, not analyses. In Chapter 4.B.1 of the FEIS there is full discussion of the socioeconomic effects on ranchers resulting from varying levels of range use. However, since mining is activity of such limited scope on the Sequoia, it was not singled out for separate socioeconomic impact analyses.

2655

DEPARTMENT OF
PLANNING AND DEVELOPMENT SERVICES

RANDALL L ABBOTI
DIRECTOR
STEVEN G LADD
Assistant Director

1103 GOLDEN STATE AVENUE
BAKERSFIELD. CA. 93301-2499
Planning Services 18051 861-2615
Building Inspection (805) 861 2391
Floodplain Management (805) 861 2892

April 28, 1986

FILE: Agency - U S Forest Service - Sequoia National Forest

Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Re DEIS - Sequoia National Forest Resource Management Plan

Dear Sir:

This Department has reviewed the Sequoia National Forest Draft Environmental Impact Statement (DEIS) and the proposed Land and Resource Management Plan (RMP) (proposed Forest Plan) and offer the following comments

1- 1. Page 3-3, RMP, and Page 3-15. DEIS.

Statement "By 2000, the county's population is expected to increase from 476,900 to 595,000."

Response. 1980 population for Kern Countv is noted correctly at 403,089. If the' figure noted' above references another base year, then the year should be stated. The statement is unclear.

2- 2. Page 3-15, DEIS.

Statement "Kern County is 77% white . . . largest minority group is black, accounting for 5% of the total. Culturally the largest minority is Hispanic. standing at 22% . . . Kern County is home for 6,900 Native Americans, or 2%. . . ."

Response. 1980 census data note the following 69.7 percent white. 21 percent Hispanic, and 1.5 percent Native American (6,008). Base year should be noted. The distinction between largest racial minority group and culturally the largest minority group is unclear.

3- 3. Page 3-5, RMP, and Page 3-18, DEIS.

In the section "Attitudes, Reliefs, and Values," it is inferred that Kern County's planning philosophies are in their infancy and fashioned by individual property desires, rather than sound principles. The first zoning ordinance was not drafted only 15 years ago, that ordinance was adopted in 1957.

It is requested that the following sentence be deleted "Subsequent updates and revisions have tended to maintain the property owner's options as he sees them." This statement is untrue. The County considers the requests of property owners in making sound planning decisions.

4- 4. Page 3-13, RMP, and page 3-40 DEIS - Geologic Hazards.

It is noted that earthquakes are not a significant hazard on the Forest. There are several known and inferred faults just wthin the Kern County portion of the Forest. Earthquake activity at certain intensities could cause property damage and personal injury. These possible impacts should be noted in the document(s).

5- 5. Pages 3-18 and 3-19, RMP, and Pages 3-52 and 3-53, DEIS - Wildlife.

A discrepancy exists between the wildlife noted as endangered, threatened, rare, or sensitive in the two documents. The Goshawk. Golden Eagle, Osprey, and Prairie Falcon are noted as rare or sensitive in the RMP but not in the DEIS. The Sierra Red Fox and Fisher are noted in the DEIS and not in the RMP. The Yellow-billed Cuckoo is designated as a rare species by the State of California. This species has been sited in the riparian habitats along the South Fork of the Kern River and should be included in the RMP as requiring special consideration to ensure population viability.

6- 6. Pages 3-20 and 3-21, RMP, and Pages 3-56 and 3-57, DEIS - Sensitive Plants.

The "Inventory of Rare and Endangered Plants of California" notes that the Alkali Mariposa Lily (Calochortus Striatus) occurs within the plan area. This plant should be included in the DEIS (plan) in order to require special management attention. The Mouse Buckwheat (Erigonium Nudum var. murinum), Hockett Meadows Lupine (Lupinus Culbertsonii), and Shevock's Monkeyflower (Mimulus Shevockii) may occur within the plan area. These plants should be included in the Forest inventory if identified within the Forest boundary.

Thank you for the opportunity to review the proposed Land and Resource Management Plan (Proposed Forest Plan).

Very truly yours,

RANDALL L. ABBOTT, Director
Planning and Development Services

Margaret A Primer
By Margaret A. Primer
Assistant Planner

jrw

Kern County - Department of Planning and Development Services

Resolution:

1. Please see Chapter 3.D.3a of the FEIS and Chapter 3.B.3a of the Plan for revision and clarification.

2. Please see Chapter 3.D.3a of the FEIS for revisions. The base year has been noted. Our copy of the 1980 census Summary Tape Files (STF) 1 and 3 for Kern County, show 77 percent white and 22 percent Hispanic. However, STF 1 shows 5,981 American Indians while STF 3 shows 6,852 American Indians. Since STF 1 is based on the 100 percent count rather then the sample, we have revised our text to be consistent with the former.

3. Please see Chapter 3.D.3c of the FEIS and Chapter 3.B.3c of the Plan for revision.

4. The scope of the Plan and DEIS is broad and geologic hazards are noted. For more detailed project work, the Geological Maps from the State Department of Conservation are used. Any local faults are identified, and specific hazards are addressed.

5. Please see Table 3.2 Chapter 3 of the Plan, and Table 3.5 Chapter 3 of the FEIS, for a complete list of wildlife species found on the Sequoia National Forest that are listed by Federal and State authority. To the best of our knowledge the yellow-billed cuckoo and osprey do not reside on the National Forest and we do not have any jurisdiction along those portions of the Kern River where they are found to reside.

6. None of the three species of plants that you listed have been identified within the Forest boundary: and, hence, are outside the scope of the Plan. Please refer to the sensitive plant section of Chapter 3 in the Plan for a complete listing of sensitive plants that occur on the Sequoia National Forest. They are also listed in Chapter 3 of the FEIS under a similar heading.

862

BOARD OF SUPERVISORS

J GORWN KENNEDY. District 1
ALFRED GINSBURG. Distict 2
GAIL HANHART McINTYRE, District 3
JESS LOPEZ District 4
DON OARNELL District 5

MADERA COUNTY

5-16-86

WANDA BRADLEY. Clerk of the Board

MADERA COUNTY GOVERNMENT CENTER
209 WEST YOSEMITE AVENUE
MADERA. CALIFORNIA 93637
(209) 675-7700

May 15, 1986

California Licensed
Foresters Association
P.O. Box 1516
Pioneer, California 95666

Gentlemen:

On May 13, 1906, the Madera County Board of Supervisors unanimously supported the MKT Market Alternative Relating to the Sequoia Forest Plan.

Please keep us informed on this matter.

Sincerely,

Don Darnell

DON DARNELL
Chairman

/tr

862

BOARD OF SUPERVISORS MADERA COUNTY

J GORWN KENNEDY District 1
ALFRED GINSBURG. Distict 2
GAIL HANHART McINTYRE, District 3
JESS LOPEZ District 4
DON DARNELL District 5

WANDA BRADLEY. Clerk of the Board

MADERA COUNTY GOVERNMENT CENTER
209 WEST YOSEMITE AVENUE
MADERA. CALIFORNIA 93637
(209) 675-7700

March 11, 1986

James A. Crates
Forest Supervisor
Sequoia National Forest
900 W. Grand Avenue
Porterville, California 93251

Dear Mr. Crates:

This letter is in response to your request for public comment concerning the proposed management plan for the Sequoia National Forest.

1- The Madera County Board of Supervisors are particularly concerned about the social and economic consequences that will result from your decision concerning the amount of timber to be harvested in the Sequoia National Forest. It is important that you recognize that your decisions affect more people and businesses than just those firms and their employees who harvest and process timber.

1- It is our understanding that in the proposed plan you have considered only the people directly employed in the timber industry in Tulare County. No analysis or consideration was given to the broader economic and social implications that result from the timber harvest in the Sequoia National Forest. Timber harvesting ripples out and touches counties and Communities far beyond the forest.

2- The needs of all who are impacted by your decisions should be determined. Restrictive and unreasonable limits placed on the amount of timber that may be harvested hurt far more people than the 1% you refer to in your management plan.

2- The timber harvest on the Sequoia National Forest should be maximized over the next decade. It is not only necessary from an economic point of view but also from a social point of view to sustain and enhance our quality of life.

Sincerely,

Don Darnell

DON DARNELL
Chairman

DD:kt

BOARD OF SUPERVISORS

J GORDON KENNEDY, District 1
ALFRED GINSBURG. Distict 2
GAIL HANHART McINTYRE, District 3
JESS LOPEZ, District 4
DON DARNELL. District 5

MADERA COUNTY

WANDA BRADLM. Clerk of the Board

MADERACOUNTYGOVERNMENTCENTER
209 WEST YOSEMITE AVENUE
MAOERA. CALIFORNIA 93637
(209) 675-7700

File No: 86099

Tape No: 1-319

Date: March 11, 1986

In the Matter of AUTHORIZATION FOR CHAIRMAN TO SIGN LETTER TO THE SEQUOIA NATIONAL FOREST REGARDING TIMBER HARVESTS.

Upon motion of Supervisor Kennedy, seconded by Supervisor Ginsburg, it is ordered that the attached be and it is hereby adopted as shown and the Chairman is hereby authorized to sign.

I hereby certify that the above order was adopted by the following vote, to wit:

AYES: Supervisors Kennedy, Ginsburg, Lopez and Darnell.
NOES: None.
ABSTAIN: None.
ABSENT: Supervisor Hanhart McIntyre.

Distribution:

CAO
County Counsel
Sequoia National Forest
Senator Cranston
Senator Wilson
Congressman Pashayan
Congressman Coelho
Congressman Lehman
Senator Maddy
Assemblyman Jones
Sequoia Forest Industries

ATTEST: WANDA BRADLEY, CLERK
BOARD OF SUPERVISORS
By Kathy Taylor
Deputy Clerk

Madera County Board of Supervisors

Resolution:

1. In our assessment of local economic effect, we focused on the direct economic effects of our Plan alternatives. Generally, these are clear and are traceable to the management decisions. In contrast, the indirect efforts you mention, while traceable in part to the management decisions, are not separable from the effects of decisions regarding other forested lands. Hence they are not susceptible to comparable analysis.

2. Since the allowable sale quantity (ASQ) will approximate historic levels, existing levels of outputs will be maintained. To the extent that this level of output contributes to Madera County's quality of life, that quality of life will be sustained.

1481

COUNTY OF KINGS
BOARD OF SUPERVISORS

GOVERNMENT CENTER HANFORD, CALIFORNIA 93230
209 - 582 3211 E M 2362

JOE HAMMOND
CORCORAN DIST II

DOYLE DAVIS
ARMONA DIST IV

ABEL J MEIRELLES
HANFORD DIST V

CHAIRMAN
DOM FARUZZI
NORTH HANFORD DIST III

VICE-CHAIRMAN
LES BROWN
LEMOORE DIST I

ROSIE MARTINEZ
CLERK OF THE BOARD

March 25, 1986

James A. Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, California 93257

Re: Sequoia National Forest
Draft Management Plan

Dear Mr. Crates:

This letter is in response to your request for public comment concerning the proposed management plan for the Sequoia National Forest.

1- The Kings County Board of Supervisors at their meeting this date adapted Resolution No. 86-029 in support of the Forest Service's decision to defer a recommendation on Segment 1 which effects the proposed location of the Rodgers Crossing Project. A copy of the Resolution is attached.

Kings County is located in an area of water deficiency and groundwater overdraft. The County, therefore, has been actively involved in acquiring additional sources of water supplies for its citizens.

We are one of thirty contractors for a water supply from the California Aqueduct and a member of the Mid-Valley Water Authority whose goal is to acquire and transport to this area a water supply from the Central Valley Project.

Additional conservation facilities on rivers tributary to the County together with importing mare water and capturing more run-off from the Sierra watershed will be necessary to resolve the water deficiency problem.

We appreciate and support your decision on Segment 1 of the Kings River.

Yours truly,

Dominic Faruzzi
Chairman of the Board of Supervisors

Attachment
Copy to Jeffrey L. Taylor

1481

BEFORE THE BOARD OF SUPERVISORS OF THE COUNTY OF KINGS
STATE OF CALIFORNIA

IN THE MATTER OF
:A NATIONAL FOREST
DRAFT MANAGEMENT PLAN

RESOLUTION NO. 86-029

WHEREAS, the U. S. Forest Service has prepared the Sequoia National Forest Land and Resources Management Plan, and Draft Environmental Impact Statement, and

WHEREAS, the U.S. Forest Service has deferred a recommendation on the Wild and Scenic River status of Segment 1 of the Kings River, Pine Flat Reservoir to Garlic Meadows Creek, until the Rodgers Crossing Project study has been completed;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors of the County of Kings supports the U. S. Forest Service decision to defer a recommendation on the Wild and Scenic River Status of Segment 1 of the Kings River until the Rodgers Crossing Project study has been completed.

THE FOREGOING RESOLUTION was passed and adopted by the following vote of the Board of Supervisors of the County of Kings this 25th day of March, 1986.

AYES: SUPERVISORS: HAMMOND, DAVIS, MEIRELLES, FARUZZI

NOES: SUPERVISORS: NONE

ABSENT: SUPERVISORS: BROWN

/s/ DOMINIC FARUZZI
Chairman of the Board of Supervisors
County of Kings, State of California

WITNESS my hand and seal of said Board of Supervisors this 25th day of March, 1986.

/s/ ROSIE MARTINEZ
Clerk of said Board of Supervisors

Kings County Board of Supervisors

Resolution:

1. Enactment of legislation in November 1987 resolved the matter of the Rodgers Crossing Dam proposal. While the Kings River Wild and Scenic River Act did not designate that portion of the river as Wild and Scenic, it did establish a Kings River Special Management Area. Specific wording in this legislation precludes dam and diversion construction without the specific approval of Congress.

'7L

TULARE LAKE BASIN WATER STORAGE DISTRICT

ESTABLISHED 1926
1109 WHITLEY AVENUE • PHONE (209) 9924127
CORCORAN, CALIFORNIA 93212

March 24, 1986

James A. Crates
Forest Supervisor
SEQUOIA NATIONAL FOREST
900 West Grand Avenue
Porterville. California 932.57

Re: Sequoia National Forest
Draft Management Plan

Dear Mr. Crates:

The District has reviewed the referenced Plan and desires that this letter be a part of the record for public comment.

1- Specifically, our comments are directed to the Section on the Kings River. We are in total support as to the decision to defer any recommendation on Segment 1 (Pine Flat Reservoir to Garlic Meadow Creek), until after the Radgers Crossing Dam Project Study has been completed.

As noted in the SNF Draft Environmental Impact Statement, the Tulare Lake Hydrologic Basin is water deficient and currently experiencing a groundwater overdraft in excess of 1 million acre feet annually. The Kings River is one of several rivers that provide local surface and groundwater to the Basin. By increasing conservation on these rivers, the existing deficiency can be eased.

This District is one of 30 public entities Contracting for water from the State via the California Aqueduct. However, the State Project water only augments our local supplies and, therefore. does not meet all our total needs. Additional conservation facilities on the Kings River are absolutely necessary to balance the groundwater conditions.

Please accept our appreciation and support of the only logical decision to defer a recommendation on Section 1 until after the Rodgers Crossing Project Studies is complete.

Yours truly,

Brent L. Graham
Manager

BLG:cc

Tulare Lake Basin Storage District

Resolution:

1. Enactment of legislation in November 1987 resolved the matter of the Rodgers Crossing Dam proposal. While the Kings River Wild and Scenic River Act did not designate that portion of the river as Wild and Scenic, it did establish a Kings River Special Management Area. Specific wording in this legislation precludes dam and diversion construction without the specific approval of Congress.

POST OFFICE BOX 1236
CORCORAN. CALIF 93212

PHONE (209) 992-5642
CORNER UTICA & 10TH AVE

ANGIOLA WATER DISTRICT

February 28, 1986

James A. Crates, Forest Supervision
Sequoia National Forest
900 West Grand Avenue
Porterville. California 93257

Dear Mr. Crates:

I am writing this letter, on behalf of the landowners and water users of the Angiola Water District, in response to your request for public comment concerning the proposed management plan for the Sequoia National Forest.

We wish to express our support for your decision regarding the Rogers Crossing area of the Kings River. We feel that it only makes sense to differ any decision on this area of the Kings until after the Rogers Crossing Dam project study has been completed.

It is a well known fact that the Southern San Joaquin Valley has a serious groundwater overdraft problem. A problem which will only get worse in the future unless some long term solutions are worked out to meet the demands of a growing economy. While no one solution will salve the overdraft problem, a combination of conservation, importing more surface water and fully developing our local run-off from the Sierra watershed will be necessary to have any realistic chance of resolving the problem.

Most importantly we feel that it would be a mistake to overlook any watershed in the Sierra which might be developed resonably. The Kings River watershed is one of the largest in the Southern Sierra and while Rogers Crossing alone won't solve the problem of overdraft it could make a major contribution to the solution. I think we all recognize that water is essential to life and is the economic foundation of the San Joaquin Valley.

The life-style we now enjoy in the central valley depends on an adequate water supply. If we fail to develope additional water storage resevoirs and are not able to keep pace with demand, serious social and economic consequences will result.

Thank you for your support and response to the needs of the San Joaquin Valley's people.

Sincerely yours,

Mike Steele

Mike Steele,
Manager/Secretary

ANGIOLA WATER DISTRICT

cc Representative Pashayan
Representative Lehman
Assemblyman Costa
Senator Vuich

DMS/cs

Angiola Water District

Resolution:

1. Enactment of legislation in November 1987 resolved the matter of the Rodgers Crossing Dam proposal. While the Kings River Wild and Scenic River Act did not designate that portion of the river as Wild and Scenic, it did establish a Kings River Special Management Area. Specific wording in this legislation precludes dam and diversion construction without the specific approval of Congress.

Kings River Conservation District
4886 E. Jensen Avenue ■ Fresno, California 93725
Telephone: (209) 237-5567

File: **518.00**

February 12, 1986

Mr. James A. Cretes, Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, California 93257

Dear Mr. Crates:

This letter is in response to the Forest Service's request for public comment concerning the Sequoia National Forest Land and Resource Management Plan - Draft Forest Plan and the Draft Environment Impact Statement (DEIS).

1- The Board of Directors of the Kings River Conservation District (KRCD) on February 11, 1986 adopted a resolution in support of the Forest Service decision that a recommendation on the Wild and Scenic River status of Segment 1 of the Kings River, Pine Flat Reservoir to Garlic Meadows Creek, be deferred until the Rodgers Crossing Project Study has been completed.

KRCD is appreciative of the Forest Service's cooperative attitude by recognizing KRCD's responsibility to fulfill its obligation to the people living within the KRCD Service Area. Created by State law in 1951, KRCD is a public agency that is charged with:

a) the storage, conservation, distribution and sale of water

b) the development, distribution and sale of electric power

c) the drainage, reclamation, and protection of land

Due to social and political change that has occurred since the formation of the District, the public perception of public agencies like KRCD has resulted in a broader definition of responsibility for the Directors of KRCD and that is, they are the managers and stewards of a natural resource of extreme importance to the people - water. **Thus,** the KRCD shares the common goal with the Forest Service of

Division I NORMAN B WALDNER Dinuba • Division II MASARU YOSHIMOTO Fowler
Division III ALVIN J QUIST Fresno • Division IV GEORGE D McKEAN Riverdale
Division V HUGH V JOHNS, Hanford • Division VI EDWIN H HOWS, Stratford
At Large, GARVIN H WHITE Fresno

GEORGE D McKEAN President • MASARU YOSHIMOTO Vice President
JEFF L TAYLOR General Manager Chief Engineer Secretary
GEORGE L MARTIN Auditor Controller • WILLIAM F DOCKER, Attorney At Law

management of natural resources in a responsible manner to benefit all the people.

While the brief description of surface water resources for the Tulare Lake Basin and the current groundwater overdraft problem as noted in the DEIS is sufficient evidence for deferring a Forest Service decision concerning Segment 1 of the Kings River, it is important to acknowledge that the Tulare Lake Easin is only part of a problem that confronts people valley wide. The depleting groundwater supply and the concurrent reduction in water quality extends bevond the Tulare Lake Basin.

The KRCD service area covers 1.1 million acres and includes portions of Fresno, Kings and Tulare Counties. The immediate responsibility of course is the service area. We have learned, however, that we cannot plan nor operate in a vacuum. For example, one of the most serious groundwater overdraft problems exists in the Raisin City/Caruthers area. This area is outside the KRCD service area yet the wells in that area draw groundwater from under the KRCD service area. KRCD must of necessity take a valley wide view and work with many other agencies and organizations if there is to be any hope of finding solutions.

We are particularly pleased that the DEIS recognizes not only the importance of imported water to our area but also the significance of conserving local water supplies to afford cost and energy savings. Development of major water projects in the State of California has come to a virtual standstill. Changes have occurred over the last 20 years in the political and economic environment that require a new direction in water development. The state. and especially the federal government. will no longer fully underwrite the financing of water projects. Local government entities like the KRCD are going to have to do more on their own. Water sufficient areas like Northern California are now reluctant to give up their surplus water unless the water deficient areas in the state have made a good faith effort to resolve their water deficiency problem by conserving as much of the local water as is economically possible

It is generally acknowledged by most experts that additional water projects must be developed in order to sustain our current agricultural production. This neans there will be no new land brought into agricultural production by adding to the existing system of dams 2nd reservoirs in the valley. In other words if we wish to maintain the economy and the present quality of life that we now enjoy in this great valley it will be necessary to build more water conservation facilities. The comment in the DEIS, page 3-36, concerning additional acres being brought

under irrigation by the year 2000 may bc correct for the entire Tulare Basin but it is not representative of the Kings River Service Are; which is currently 95% developed to its potentia: irrigable area. Our projections are that the total irrigated area in the KRCD service area by the vear 2020 will be about the same as it is today.

Developing an additionel supply of surface water for the Southern San Joequin Valley can be acconplished through one or more of the following methods: 1) importing additional water from outside the valley; 2) capturing more of the run-off water from the Sierra and the Sequoia watersheds; and 3) more efficient use of the existing surface water supply. Most experts agree that a combination of the foregoing methods will be needed to solve the problem.

No new surface water storage projects have been constructed on local streams since Terminus Dam on the Kaweah River was completed in 1962. The aggregate active storage capacity of the San Joaquin, Kings, Kaweah, Tule and Kern Rivers is only about 60 percent of the rggregate average annual runoff of these streams. Furthermore, dams along the foothill line on these streams were built by the U.S. Army Corps of Engineers with flood control as a primary purpose; therefore, much of the storage is reserved to control flood flows. The remaining conservation storage is used primarily for seasonal regulation of flows; long-term carryover storage is provided by the groundwater basin.

The fact that no new surface water storage facilities have been added in over two decades coupled with the depletion of the groundwater storage prompted the KRCD to study the feasibility of alternatives that were identified in the "Master Plan Study for the Kings Service Area" in December 1974. This study identified six specific areas for consideration end further study. Two of the six recommendations, the Pine Flet Power Plant and a reservoir at Dinkey Creek have been studied and were approved. The Pine Flat Power Plant was completed in 1983 while construction at Dinkey Creek will begin in 1986.

Three of the six recommendations are yet to be studied indepth, with Rodgers Crossirg studies being first, followed by studies of raising the height of Pine Flat Dam and building a dam on Mill Creek upstream from its confluence with the Kings River. In addition, the district is looking for other areas on the Kings River as potential candidates for study to determine their feasibility for water storage facilities.

The recommendation by the Sequoia National Forest to defer a decision concerning the Rodgers Crossrng area on the Kings River is responsive to the critical need to explore a multiplicity of possibilities to develop additional water conservation projects. The recommendation recognizes that Forest Service decisions carry an impact that goes far beyond the boundaries of a particular forest. Again. the KRCD supports the recommendation.

To demonstrate that there are more people concerned about the water problea besides KRCD, I have taken the liberty of enclosing copies of resolutions of support for the Rodgers Crossing studies that were passed by various organizations and local government bodies. These clearly demonstrate that the Forest Service and KRCD are not alone in trying to deal with a problem that has serious social and economic ramifications

Should you or your staff desire additional information or have any questions, please do not hesitate to contact me. The KRCD Board of Directors and the entire staff welcome the opportunity to work with you.

Sincerely yours,

Jeff L. Taylor
General Manager-Chief Engineer

JLT/ar

Enclosures. As Stated

BEFORE THE BOARD OF DIRECTORS
OF THE KINGS RIVER CONSERVATION DISTRICT
FRESNO, CALIFORNIA

RESOLUTION NO. 86-8

WHEREAS, the U.S. Forest Service has prepared the Sequoia National Forest Land and Resources Management Plan, Draft Forest Plan and Draft Environmental Impact Statement, and

WHEREAS, the U.S. Forest Service has deferred a recommendation on the Wild and Scenic River status of Segment 1 of the Kings River, Pine Flat Reservoir to Garlic Meadows Creek, until the Rodgers Crossing Project study has been completed,

NOW, THEREFORE, BE IT RESOLVED, that the Board of Directors of the Kings River Conservation District supports the U.S. Forest Service decision to defer a recommendation on the Wild and Scenic River Status of Segment 1 of the Kings River until the Rodgers Crossing Project study has been completed.

THE FOREGOING RESOLUTION was passed and adopted by the following vote of the Board of Directors of the Kings River Conservation District this 11th day of February, 1986.

AYES: Directors Howe, Johns, McKean, Quist, Waldner, White and Yoshimoto

NOES: None

ABSENT: None

George D. McKean
President

ATTEST.

Secretary

SECRETARY'S CERTIFICATE

I, Jeff L. Taylor, Secretary of Kings River Conservation District, hereby certify that the foregoing is a full, true and correct copy of a resolution duly adopted at a regular meeting of the Board of Directors of said District duly and regularly held at the regular meeting place thereof on the 11th day of February, 1986, of which meeting all of the members of sard Board of Directors had due notice and at which a majority thereof were present.

WITNESS my hand and the seal of Kings River Conservation District this 11th day of February, 1986.

Jeff L. Taylor
Secretary

(Seal)

ORGANIZATIONS AND LOCAL GOVERNMENT BODIES WHO HAVE PASSED RESOLUTIONS SUPPORTING THE FEASIBILITY STUDIES OF WATER STORAGE FACILITIES AT RODGERS CROSSING ON THE KINGS RIVER

ORGANIZATIONS:

Fresno City and County Chamber of Commerce - Sept. 30, 1985

Raisin Bargaining Association of the San Joaquin Valley - Dec. 9, 1985

Fresno County Farm Bureau - July 11, 1985

LOCAL GOVERNMENT:

Fresno County Board of Supervisors - Oct. 1. 1985

Kings County Board of Supervisors - Oct. 8, 1985

Madera County Board of Supervisors - Sept. 3, 1985

Tulare County Board of Supervisors - July 9, 1985

Clovis City Council - Sept. 30, 1985

Corcoran City Council - Sept. 16, 1985

Dinuba City Council - Sept. 10, 1985

Hanford City Council - Oct. 15, 1985

Lemoore City Council - Sept. 3, 1985

Reedley City Council - July 16, 1985

Sanger City Council - Sept. 17, 1985

Selma City Council - Sept. 3, 1985

Kings River Conservation District

Resolution:

1. Enactment of legislation in November 1987 resolved the matter of the Rodgers Crossing Dam proposal. While the Kings River Wild and Scenic River Act did not designate that portion of the river as Wild and Scenic, it did establish a Kings River Special Management Area. Specific wording in this legislation precludes dam and diversion construction without the specific approval of Congress.

ALTA
IRRIGATION
DISTRICT

294 NORTH L STREET
P O BOX 715
DINUBA CA 93618
209 591 0800

BOARD OF DIRECTORS
NORMAN B WALDNER
PRESIDENT

LEONARD F WILEMAN
BEN AGRIFOGLIO
FRANK H WARKENTIN
JOHN L HUCKABAY
HARRY M KAPLEIN
[illegible] ANDAGER
[illegible] M COLEMAN
[illegible]
CHARLES ROEMER

James A. Crates
Forest Supervisor
Sequoia National Forest
900 W. Grand Ave.
Porterville, CA 93257

Dear Mr. Crates

The Alta Irrigation District (AID) encompasses approximately 129,000 acres. principally in Fresno and Tulare Counties. Within the District there are approximately *4,000* small farming operations with the average size being less than *40* acres and the cities of Dinuba and Reedley and many small unincorporated communities.

It is an economic necessity to the farmers and developing communities within the District to provide low cost water for farming operations and to recharge underground aquifers. At the present time there is a thirty thousand acre feet groundwater overdraft within the AID service area.

1 - It has been well documented that since 1978 more than four million acre feet of Kings River water has flowed to the ocean as flood waters. Existing reservoirs on the Kings River are not able to retain all the runoff waters from wet or above normal years. As a result, additional storage on the Kings River is a viable solution that needs to be earnestly studied. We would like to espress our support for your decision concerning the Radgers Crossing Area an the Kings River. It Seems to make good *sense* to study the area in question before making *a* recommendation which could have far reaching implications for future generation within the San Joaquin Valley.

Thank you for your support and response to the needs of the people in the San Joaquin Valley.

Sincerely.

ALTA IRRIGATION DISTRICT

Norman B. Waldner

Norman B. Waldner
President

NBW.jmc

Enc. 1

Alta Irrigation District

Resolution:

1. Enactment of legislation in November 1987 resolved the matter of the Rodgers Crossing Dam proposal. While the Kings River Wild and Scenic River Act did not designate that portion of the river as Wild and Scenic, it did establish a Kings River Special Management Area. Specific wording in this legislation precludes dam and diversion construction without the specific approval of Congress.

Riverdale Irrigation District
PO Box 683
RIVERDALE, CALIFORNIA 93656

March 12, 1986

James A Crates - Forest Supervisor
Sequoia National Forest
900 W Grand Ave.
Porterville, CA 93257

Dear Mr. Crates:

1- In response to your request for publio comment concerning the proposed management plan for the Sequoia National Forest, the Board of Directors of the Riverdale Irrigation District want to express their support for your decision concerning the Rodgers Crossing Area on the Kings River. It vould be wise to wait for any recommendation for this part of the river until after the Rodgers Crossing Dam Project Study has been completed.

Water is a precious commodity for Central California. The future of agricultural and life itself depends on vater. The development of additional water storage facilities must be done to keep pace with demand.

Thank you for your support.

Sincerely yours,

RIVERDALE IRRIGATION DISTRICT

Kimberley Mayfield, Secretary

Riverdale Irrigation District

Resolution:

1. Enactment of legislation in November 1987 resolved the matter of the Rodgers Crossing Dam proposal. While the Kings River Wild and Scenic River Act did not designate that portion of the river as Wild and Scenic, it did establish a Kings River Special Management Area. Specific wording in this legislation precludes dam and diversion construction without the specific approval of Congress.

City of Dinuba

"Rainland U.S.A."

405 EAST EL MONTE WAY
DINUBA CALIFORNIA 93618

March 5, 1986

PHONES

City Hall/Finance	209/591-1203
Personnel	209/591 1621
Purchasing/Recreation	209/591-2345
Building/Planning	209/591-1980
Public Works/Parks	209/591 3725
Fire/Ambulance	209/591-3152
Police	209/591-6130

Mr. James A. Crates
Forest Supervisor
Sequoia National Forest
900 W. Grand Avenue
Porterville, CA 93257

Dear Mr. Crates

I am sending you these brief comments in response to your request for public comment on the proposed management plan for the Sequoia National Forest.

1- As spokesperson for the Community of Dinuba, I am concerned that a sufficient amount of National Forest Lands timber will be allowed to be harvested to assure the continued economic vitality of the woods products industry This industry provides many jobs and benefits in our community and any major cut back could seriously affect the quality of life in our community.

1- In summary, I would encourage you to consider the local economic effects in determining the size of the harvest in order to avoid detrimental social and economic consequences to our community and others who depend on the wood products industry.

Thank you for allowing me to comment on this issue.

Sincerely,

Barbra Lankford

Barbra Lankford
Mayor

cc Congressman Chip Pashayan
James H. Anthony
Assemblyman Bill Jones
Senator Rose Ann Vuich

City of Dinuba

Resolution:

1. As shown in the Record of Decision, local economic effects were one of several factors considered in determining the Forest's allowable sale quantity (ASQ). The average annual volume harvested for the last 27 years was 92.0 MMBF with a range from 57 MMBF in 1982 to 125 MMBF in 1977. The projected annual timber harvest is 101.6 MMBF (ASQ is 97 MMBF of green timber and 4.6 MMBF salvage). Since the future levels under this Plan will approximate the historical levels, no adverse economic change is expected in the local timber industry and related businesses.

City of La Mirada
Community Services

February 24, 1986

Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, Ca 93257

1- As a white water rafting enthusiast, I am extremely concerned over the plans to dam the Kings River at Rodgers Crossings. I have rafted this section of the river for the past four years and found it to be one of the most enjoyable rafting areas in the California area. I strongly urge the forest department to not allow a dam on this section of the river.

2- The section of river above Kirch Flat Campground offers a multitude of recreatonal activities and experiences that are becoming harder to find within driving distance from the Los Angeles area. I have worked in the recreation field for over twenty years providing the type of activities and experiences that make life worth living. I realize that this is a very biased statement but without leisure time activities that are challenging and rewarding. life would not be worth the effort we all put forth. The group that I go rafting with on the Kings, approximately 75 adults and children, agree that white water rafting provides a meaningful. challenging and most rewarding recreational experience. It is also within a five hour drive of Los Angeles. To dam Chis section of river would be a terrible shame. It would eliminate one of the few wild sections of raftable rivers left in California and destroy a variety of other outdoor recreational experiences such as fishing, camping. hiking along a natural river, etc.. I understand that a dam could create several other activities (boating, lake fishing) but with Lone Pine Reservoir within a very short distance that provides those activities, I don't think that additional reservoir type activities will be needed. I also understand that a control situation can be created by the dam to allow continued rafting below the dam but this seems like an attraction at Disneyland versus rafting the white water of a wild, natural river.

3- Again, I urge you to reconsider any thoughts on damming the Kings River but instead make it part of the Wild and Scenic category of the forestry system. Please. on behalf of the 75 plus rafters of the "Brea Rafting Team" place this section of river in the Draft Forest Plan and protect it within the Wild and Scenic River System. It is most definitely a public resource that is worth preserving for the future generations of Californians.

Thank you,

RICHARD C. PEPIN, Director

Kling Center 12900 Bluefield Avenue. La Mirada, California 90638 • (213) 943-7277

Contracted with People Helpers Inc

City of La Mirada

Resolution:

1-3 Legislation (November 1987) designating the Kings River as a Wild and Scenic River is now law. This legislation establishes direction for future management of this area. Management actions will be detailed in a management plan, to be prepared within 3 years. River rafting will be one of the activities encompassed by this management plan and may or may not change from the existing situation. Public involvement will be an important aspect of this planning process.

2657

Tulare County
Economic Development
Corporation

9303 Airport Drive
Visalia California
93277
209 651 1244

April 25, 1986

Mr. James A. Crates
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Dear Mr. Crates.

The Executive Board of the Tulare County Economic Development corporation (EDC), representing the County of Tulare, all of the incorporated cities in the County, and the Tulare County Private Industry Council, has reviewed the Sequoia National Forest Land and Resource Management Plan.

After chat review, the Executive Board of the EDC unanimously supports the "Market Alternative" as being the best approach to maintain jabs and the economic health of our forest industries and balancing timber interests with recreation and wilderness protection.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement.

Sincerely,

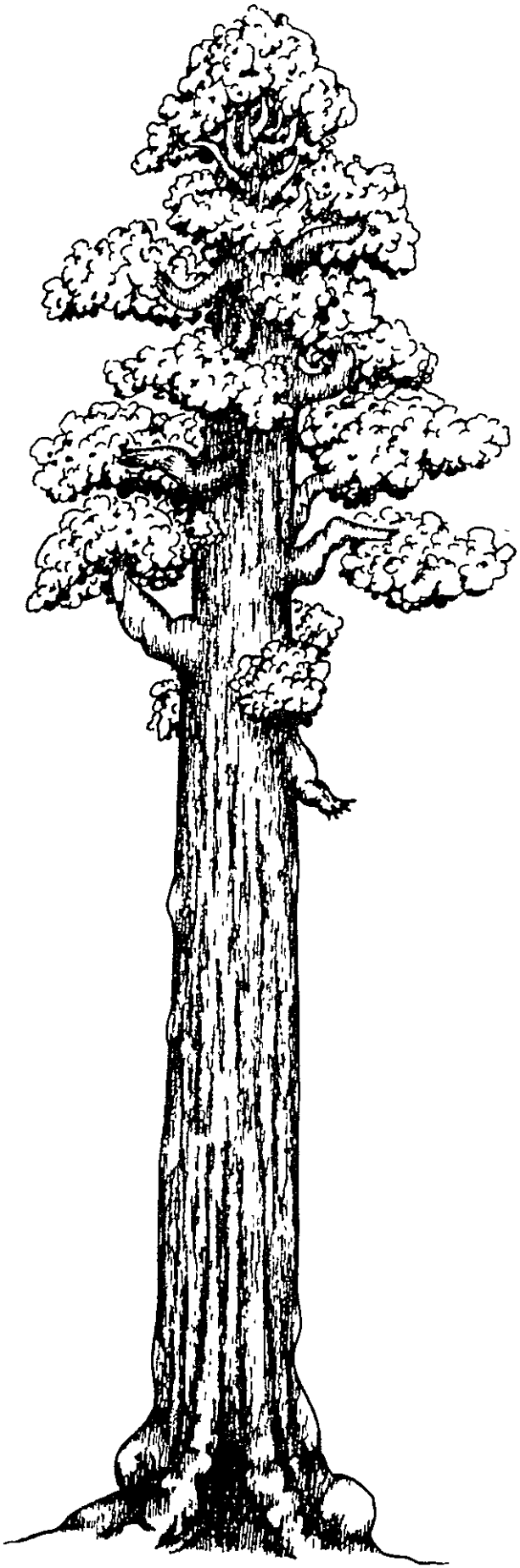
Edward F. Graves
Executive Director

EFG:pcp

Tulare County Economic Development Corporation

Resolution:

1. While the Market Alternative may be good from an economic standpoint, we believe the Preferred Alternative represents a better mix of economic and noneconomic values.



Section 8

RESPONSE TO THE CHEC REPORT

The summary of the Cascade Holistic Economic Consultants (CHEC) "Review of the Draft Sequoia Forest Plan and EIS" is reprinted below. Four additional points (12-15) were added to include topics included in the comment yet excluded from CHEC's summary. Forest Service resolutions follow. Numbers added to the margins of the letter correspond to the resolutions.

REVIEW OF THE DRAFT SEQUOIA FOREST PLAN AND EIS

Introduction and Summary

The Sequoia National Forest published its draft forest plan and environmental impact statement (EIS) in November 1985. CHEC was retained by the Kern Valley Wildlife Association to review these documents. CHEC visited the Sequoia Forest Supervisor's office in January 1986 to examine FORPLAN runs, background planning data, timber sale information, and other documents relating to the Plan. This report is based on those reviews.

CHEC identified a number of serious problems with the information used in the planning process. These included:

1- Timber yield tables overestimate the future growth of both existing and regenerated stands. As a result, proposed timber harvests may be unsustainable in the long-term.

2- A side-effect of the yield tables was an underestimate of timber rotation ages. An increase in rotation ages to the legal minimum could affect harvest levels by reducing the amount of "old-growth" (i.e., older than rotation age). The volume of old-growth is a major factor limiting timber sale levels.

3- Planners computed harvest levels which would never decline in terms of cubic feet, and then assumed that board foot sales would also never decline. In fact, the board foot:cubic foot ratio, which depends on the size of the trees, will decrease as existing older timber is converted to younger and smaller timber. This will lead to a decline in board foot sales in the future, which may be a violation of the law.

4- Planners also overestimated timber prices by about 50 percent. This led FORPLAN, the computer program used to assist planners, to overestimate the number of acres which could profitably be managed for timber. In fact, CHEC found that as much as half of all timber sold by the Sequoia in recent years lost money, and that investments in future timber stands are likely to produce less than two percent rate of return.

5- In addition, planners unrealistically assumed that timber prices would dramatically increase in the next 10 years from levels which were already too high. Among other things, this led FORPLAN to allocate tens of thousands of acres of land to timber which are not needed to meet first-decade harvest objectives.

6- Planners failed to show that clearcutting is the optimal method of harvest in those areas where it is proposed. In particular, planners

failed to consider that alternatives to clearcutting may reduce the future need for future herbicide applications.

7- The yield table for spotted owls in FORPLAN is completely unrealistic, indicating that timber as young as 70 years old can provide satisfactory spotted owl habitat. Although spotted owls are supposed to be an old-growth "indicator species." the yield table actually provides an incentive to rapidly liquidate old-growth.

8- Forest Service estimates of water values are greatly exaggerated. Since planners assumed that timber harvests in certain areas lead to greater water yields, FORPLAN proposes to harvest timber which otherwise loses money simply to gain this imaginary water value,

9- Current and proposed grazing levels on the Sequoia are far in excess of grazing capacity. Planners failed to evaluate the efficiency of programs aimed at maintaining or increasing grazing levels; such programs are extremely costly and produce little or no gain.

10- Planners accepted the goal of promoting local economic stability but failed to evaluate its cost. CHEC estimates that the marginal cost of one timber-related job on the Sequoia is at least $8,000 per year, and one grazing-related job is at least $10,000 per year. Given that timber values are lower and marginal grazing costs much higher than those used by planners, these figures are conservative.

11- The EIS fails to evaluate the consequences of the proposed doubling of timber harvests on the Cannell Meadows Ranger District. from 15.8 million board feet to 31.7 million board feet (Plan pages C-8 - C-10). This action requires a much more detailed analysis, especially in view of planners' apparently incorrect conclusion that the Cannell Meadows District provides no potential spotted owl habitat.

With the exception of the last problem, most of these errors can be corrected by improving the FORPLAN model and other data between the draft and final EIS. These corrections may require significant changes in the formulation of alternatives, however, and the results of new benchmark and alternative FORPLAN runs may indicate that the preferred alternative should be dramatically altered.

The doubling of harvests on the Cannell Meadows Ranger District may require more drastic action. The local environmental effects of this proposal should be detailed in a separate environmental impact statement.

(The following 4 points were included in CHEC's comment and not in their summary.)

12. New roads will not provide any new roaded or motorized recreation value. While new roads may be used by recreationists, such use would merely be transferred from one part of the Forest to another. The costs of new timber-related roads proposed in the Plan are, therefore, attributable solely to timber management, and not to recreation.

13. It is imperative that data be collected indicating where productive and unproductive soils exist on the Forest. No data, however, exists on the exact locations of soil types on the Forest, according to a 1984 AMS update. Thus, the Sequoia National Forest may be unable to insure that, as Section 6(g)(2)(E) of NFMA requires, "Timber will be harvested from National Forest system lands only where soil, slope, or other watershed conditions will not be irreversibly damaged."

14. The monitoring program included with the Sequoia Plan is extremely weak. Although it requires periodic assessments of plan implementation, no actions are required should some aspect of the Plan be found to be failing. For example, the monitoring program requires managers to determine the success of reforestation, release, and timber stand improvement (pre-commercial thinning), but imposes no requirements if these activities are either unsuccessful or unfunded.

15. The proposed Peppermint Mountain Resort was considered fixed in all alternatives of the Forest Plan EIS, which was prepared concurrently with the EIS for the ski resort.

FOREST SERVICE RESOLUTION

To: Kern Valley Wildlife Association

Thank you for your letter of 2/4/86 forwarding the review of the Draft Sequoia Forest Plan and EIS performed by CHEC. I will take this opportunity to respond to major issues raised in this review.

TIMBER GROWTH AND YIELD

The points relating to yield tables and overestimation of future growth have been addressed in a letter from Deputy Regional Forester Ray Weinmann to Mr. Randal O'Toole dated November 21, 1986. This letter is part of the planning record. It is on file and available to anyone wishing to review it.

LONG-TERM SUSTAINED YIELD (TIMBER)

The criticism of using cubic foot estimates in LTSY calculations is apparently based on a misunderstanding of how the Scribner log rule is used. This log rule assigns board foot values to individual logs for payment purposes. It does not predict utilized wood content of these logs. The Scribner log rule actually underestimates small log board feet and overestimates large log board feet. This fact is revealed in sawmill lumber recovery studies. The discrepencies between estimated and recovered board foot volume is compensated for by applying empirically derived "overrun" factors in the timber sale appraisal calculations.

The cubic foot measure is used in planning for growth and yield because it is not biased by product output expectations. This is why the National Forest Management Act (NFMA) requires use of the cubic foot measurement in forest planning estimates. While the board foot to cubic foot ratio does indeed change with log size, merchantability and utilization standards remain in effect so that cubic volumes will in fact reflect timber on a net market volume basis.

TIMBER VALUE

Timber price estimates used in planning are based on historical trend data. The trend for the past 100 years shows increases running ahead of inflation during periods of economic expansion and decreases less that the rate of recession during periods of economic decline. The assumption used in planning is that recent market turmoil will not last and that the long-term price trend will resume. Lumber price trends are nearly matched by timber production cost trends. The general effect is an upward net price trend of about 1/10 of one percent. National Forest planning analyses have shown only a trivial effect, generally less that one percent, on the harvest level and none on the land allocation when price trending is not used.

The CHEC analysis of timber sale economics ignores the fact that the Forest Service is not in business solely to maximize financial return. The Forest Service must be responsive to multiple-use issues. Consideration of other natural resource values often lowers net return from timber.

CLEARCUTTING AS THE OPTIMUM HARVEST METHOD

The FOFPLAN linear programming analysis invariably shows clearcutting as the preferred harvest method when partial cutting is also an option. Besides providing the most cost-effective method of harvest, clearcutting is also optimal for the following reasons:

a. Less forest land is used to reach a given harvest goal.

b. Damaged trees resulting from harvest operations are more feasibly removed so their values are not lost.

c. Clean-up of logging slash to reduce fire hazard can be more efficiently and effectively acccomplished.

d. Preparation of the area to produce a new timber stand is more easily done and more likely to result in successful stand establishment.

e. Growth rates of young trees are higher than where they must compete with established older trees in partial cut areas.

f. Certain diseases, such as dwarf mistletoe and root rots, are more easily controlled when the source of infection is removed from an entire stand at one time.

g. Clearcutting emulates the natural process that produced stands with large amounts of shade intolerant trees (pines). Without periodic, major disturbances, ecological succession tends to replace pines with fir and incense-cedar. Partial cutting reinforces this tendency.

SPOTTED OWLS

The FOFPLAN model is simply a way of displaying the total amount of suitable owl habitat on the Sequoia National Forest. It merely indicates the relative difference in habitat between alternatives. Of more importance is how the spotted owl will actually be managed on the ground, and the methods used to arrive at that management.

FOWLAN modeling was originally used as a base to start from in displaying vegetative types on the Forest. All areas considered as suitable habitat were identified. These areas were checked utilizing vegetative type maps and aerial photographs to verify their existence and the extent to which they may have been altered by past management activities. Fragmentation of this habitat was not taken into account.

The next step was to compile the known locations of spotted owls on the Forest. Beginning in the 1970s and continuing to the present time, surveys to identify known locations of owls have been conducted. Some of these surveys concentrated on small areas or were simply sighting reports

documentd by Forest Service employees. Other surveys were quite extensive; such as the survey conducted on the Cannell Meadow District in 1986 and on the Forest as a whole in 1987. There is no question surveys should continue into the future.

The third element to be correlated was the Region 5 guidelines in Appendix H of the final EIS for the Pacific Southwest Regional Guide. The direction from this document required the establishment of Spotted Owl Management Areas (SOMA's) which consist of three or more habitat areas of 1,650 acres each of suitable habitat, or potentially suitable habitat. These areas are spaced within 1.5 miles of one another. These groups of habitat areas, or SOMA's, are spaced 6-12 miles apart.

Suitable habitat in each territory consists of 30-80 percent old growth with the remaining acreage in younger stands of mixed conifer and mixed hardwood/conifer stands. The selection of these vegetation types in the habitat areas was based on what currently exists (only mature old growth stands available) and on the adaptability of spotted owls in the southern Sierra Nevadas to utilize different timber types and seral stages.

The establishment of the spotted owl habitat area network on the Forest has led to 40 habitat areas (66,000) acres dedicated to spotted owl habitat and other species that utilize old growth and associated stands (each area is 1,650 acres or larger). Assuming one pair of owls utilize each area, a minimum viable population of 40 pairs of spotted owls will be assured over time on the forest.

Future needs concerning this program include the development of a habitat capability model for the spotted owl in the southern Sierra Nevadas, monitoring of the habitat areas for occupancy and use by the owls, monitoring to insure the areas are being protected under dedication status, and the development of a specific management plan for each area.

VALUE OF WATER YIELD

The value of water used in the FORPLAN model was taken from the 1985 RPA assessment as developed for use by the State of California. This value was based on the minimal water cost to agriculture less transportation and storage. This is a conservative estimate because the major watersheds on the Sequoia National Forest have hydroelectric facilities making water yield even more valuable.

WATER QUALITY

Best Management Practices (BMP's) were developed to protect water quality. The Forest will monitor the implementation of BMP's and evaluate their effectiveness using the Sequoia National Forest Riparian Standards and Guidelines monitoring plan.

LIVESTOCK FORAGE

The 50,500 AUM figure cited as the current carrying capacity is a misinterpretation. Table 3-18 Subsection C should read: "Potential increase in AUMS (constrained maximum) equals 28,250 AUMS. This is a total of the

subsequent estimates of potential increases by vegetation types." We apologize for the error and have corrected this in the final EIS. It is important to realize this is not the present carrying capacity but rather an estimate of the potential increases in AUMS over the present permitted use.

There seems to be some confusion between RPA production targets and carrying capacity. The statement that the Sequoia National Forest has exceeded the carrying capacity is incorrect. The 1980 RPA production targets stated throughout the Plan (55,600 AUMS for 1990 and 59,700 AUMS for 2030) were the Sequoia's share of the projected increase in red meat demand. The carrying capacity deals with the lands ability to support livestock. The targets were incorrectly labelled as AUM's throughout the Plan. They should have been labelled *AM's.* We have converted these targets to AUM's in the final EIS and Plan to avoid confusion. Again, we apologize for the error. It is correct that the 80,000 AUM goal is above the existing supply and would be expensive to achieve. This goal was based on the assumption that meat consumption was going to increase through the planning period. This has not yet happened. The Preferred Alternative in the Final EIS holds livestock numbers at the 1986 levels through the first decade with local adjustments being made based on fluxuations in feed conditions. There will be little emphasis on expensive nonstructural range improvements. The current livestock numbers are well within the existing carrying capacity for the Sequoia.

There are substantially more than 28 jobs in the private sector dependent on the Sequoia's range resource and substantially less than six full time positions on the Forest that deal directly with range mandgement. The calculation of annual subsidies in the range program is based on these misconceptions and therefore, is not valid. In fact the reverse is true. The Sequoia has for some time realized more money in grazing fees than it has spent administering the range program. It is also important to understand that grazing fees as well as annual Forest Service budgets are determined at a national level and outside the authority of this Plan. Nevertheless we are in agreement that the program should be as cost-effective as possible.

Conflicts between livestock and the recreating public will be addressed on a case-by-case basis.

COMMUNITY STABILITY AND GROWTH

The basis for assuming that the Sequoia National Forest has accepted local economic stability as a goal is found in the Draft Forest Plan, page 3-3. This is a portion of a description of the attitudes, beliefs, and values of Tulare County residents, not a discussion of Forest goals.

INCREASED HARVEST LEVEL ON THE CANNELL MEADOW RANGER DISTRICT

Harvest levels by Ranger District are approximately proportional to the suitable land base acres and timber inventory on each District for the conditions and constraints imposed by the particular alternative in question. The process of defining suitable land base is described in the Plan, Appendix C. The harvest level assigned to the Cannell Meadow District in Alternative PRF is higher than the traditional level because of

the proportional share of land suitable for timber management on that District.

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
PACIFIC SOUTHWEST REGION
REGIONAL OFFICE
630 SANSOME STREET
SAN FRANCISCO, CA 94111

REPLY TO: 2410

DATE: Novemeber 21, 1986

Mr. Randal O'Toole
Cascade Holistic Economic Consultants
425 West Third, Number 2
Eugene, Oregon 97401

Dear Randy:

We have completed our review of the four major points raised in your publication, "Analysis of Region 5 Yield 'fables, "CHEC Research Paper Number 17. Our comments are enclosed with this letter.

Our meeting of October 9, 1986 was helpful in better understanding your concerns. However as discussed at that meeting we cannot agree with your conclusions and supporting reasons. Some of your unsubstantiated statements conflict with rundamental stand growth principles. It would have been helpful to have citations and references from the technical growth and yield literature that support your statements.

We believe it would not serve a useful purpose to have an independent third party technically review the Forest Service RAMPREP model and your criticrism of it at this time. We would be willing to expend public funds on such an effort if you can provide valid support for your contentions.

You may also want to pursue this matter by submitting your findings to a technical forestry journal for review by independent experts in stand growth and yield. An appropriate publication might be the Western Journal of Applied Forestry.

Sincerely,

RAYMOND G. WEINMANN
Assistant Regional Forester for
Timber Management

Enclosure

cc: John Moore, Mother Lode Chapter, Sierra Club
Steve Beckwitt
R-6, TM
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