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*Submitted by email to: [r5planrevision@fs.fed.us](mailto:r5planrevision@fs.fed.us)*

**RE: Outdoor Alliance Comments on Sierra and Sequoia Draft Forest Plans and Revised Draft Environmental Impact Statement**

Dear Planning Team,

Thank you for the opportunity to comment on the revised draft Environmental Impact Statement (RDEIS) and draft plans for the Sierra and Sequoia forest plan revisions. These comments are submitted on behalf of the Outdoor Alliance, a coalition of ten national advocacy organizations that includes American Whitewater, American Canoe Association, Access Fund, International Mountain Bicycling Association, Winter Wildlands Alliance, the Mountaineers, Surfrider Foundation and the American Alpine Club. Many thousands of our members annually visit the Sierra and Sequoia National Forests to hike, camp, mountain bike, paddle, rock climb, backcountry ski, cross-country ski, and snowshoe. Access to, and preservation of, the sustainable infrastructure and landscapes required for high-quality recreational activities is very important to our membership, and we appreciate that the draft plans recognize the primary role that sustainable recreation plays on these forests.

The 2012 Planning Rule aims to balance multiple-uses, including recreation, with the restoration and maintenance of forest and water ecosystems. By the Forest Service's own estimation, of all the resource values provided to the American people by these forests, recreation is the second highest value after clean water (significantly higher than timber, mining, grazing, etc.). In recognition of recreation's importance, and to meet the requirements of the 2012 Planning Rule, revised forest plans must include specific plan components throughout that address and integrate sustainable recreation, including recreation designations, settings, opportunities, and access; recreation infrastructure development and maintenance; ecological integrity and scenic character.<sup>1</sup>

These plan components should take into account the outdoor recreation economy and opportunities to connect people with nature. Of course, all of these elements are interrelated. As people connect with nature through recreation; they contribute to the outdoor recreation economy, and the protection of natural resources is integral to the sustainability of recreation opportunities. Therefore, protecting the natural resources and environment on these forests, as well as maintaining to standard adequate recreation infrastructure and leveraging robust partnerships with user groups and local communities, is an essential element of sustaining the region's outdoor recreation economy and the health of our forests.

We have reviewed the draft forest plans and revised draft environmental impact statements issued on June 28, 2019, and offer the following comments. We also incorporate by reference our prior comments submitted August 24, 2016. While these draft plans and the forests' preferred alternatives include many commendable elements, we identify several crucial omissions below, as well as numerous detailed

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<sup>1</sup> 36 CFR 219.10 (b)(1)(i)



suggestions for how the Forest Service can more thoroughly integrate elements of sustainable recreation with other plan components in order to provide more effective guidance and management of these forests.

We also deeply appreciate the Forest Service's introduction of a Backcountry Management Area (BMA) concept as part of Alternative E in the RDEIS as a means to protect important roadless areas and other wildlands not recommended for Wilderness. We have worked with climbers and local mountain bikers, to improve geospatial datasets on existing non-motorized recreation infrastructure, assets, and opportunities on these forests, and have collaborated with our partners in the broader conservation community to find workable compromise between our shared desire to protect and preserve Wilderness characteristics, solitude, natural soundscapes, and the highest levels of scenic and ecological integrity wherever possible on these forests, while still allowing for appropriate non-motorized recreational access and opportunities.

We feel that, with more specific definition and management prescription (see below), the balance between recommended Wilderness areas and BMAs introduced in Alternative E (as amended in the most recent datasets we have submitted with these comments<sup>2</sup> as well as under separate cover jointly submitted with Sierra Forest Legacy, Cal Wild et al.), represent a solid and sustainable management scenario for these particular landscapes. These alternative designations will effectively protect key ecosystems that are currently underrepresented in the National Wilderness Preservation System, as well as the variety of human-powered recreation opportunities therein, in a way that will minimize stakeholder conflict and also add collaborative support for these designations. We hope to see these alternative designations incorporated into the forests' preferred alternative for final draft plans.

We understand that there is strong interest in moving expeditiously through the planning process, but ensuring that plans are complete and reflect public input is essential to meeting the goals of the 2012 Planning Rule process, as well as to ensuring that plans are durable and less likely to be subject to objections and litigation. In particular, we are deeply concerned by the Wild and Scenic Rivers eligibility inventory process, which, as outlined below, appears to have proceeded without considering legally required river segments and without proper consideration of public input.

As elaborated below, the Forest Service must:

- Support sustainable recreation more thoroughly with required plan components;
- Integrate specific plan components for sustainable recreation management across planning focus areas, including fire and fuels management, meadow restoration, etc.;
- Support ROS settings with required plan components;
- Develop separate Winter ROS settings and allocations and commit to undertake Subpart C travel planning for winter recreation uses;
- Clarify management prescriptions for different Special Recreation Management Areas to ensure appropriately focused management for areas of particular recreational significance;
- Clarify management prescriptions related to recreation (especially climbing and mountain biking) for recommended Wilderness areas and proposed Backcountry Management Areas (Alternative E);
- Recognize that rock climbing is a valid use in designated and recommended Wilderness areas and incorporate specific guidance for managing fixed anchors in Wilderness;
- Recognize that mountain biking is a valid use outside of designated Wilderness areas on these forests, including in Backcountry Management Areas, and that working with local partners and

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<sup>2</sup> OutdoorAlliance\_ProposedRDEIS\_RecData\_20190925.zip



volunteers to develop and maintain to standard an accessible and connected network of purpose-built non-motorized mountain bike trails needs to be a priority;

- Recognize the need to provide and protect accessible frontcountry areas for non-motorized winter recreation (cross-country skiing, snowshoeing, family snowplay, etc.); and
- Complete the Wild and Scenic Rivers inventory process, specifically evaluating previously identified rivers for the Outstandingly Remarkable Value of whitewater recreation and thoroughly incorporating previously provided public input.



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## I. SOCIAL AND ECONOMIC SUSTAINABILITY AND MULTIPLE USES: SUSTAINABLE RECREATION

The 2012 planning rule includes a welcome new focus on sustainable recreation, and we support the language in the draft plans that addresses this topic. We appreciate the Forest Service's stated desire to provide "a range of year-round developed and dispersed recreation settings that offer a variety of motorized and non-motorized opportunities and recreation experiences that provide satisfying experiences for the variety of visitor preferences."<sup>3</sup>

The RDEIS and both draft plans correctly identify the value of the outdoor recreation economy for many of the gateway communities bordering the Sierra and Sequoia National Forests. Spending by visitors to the Sierra and Sequoia National Forests is an important economic factor for gateway communities across the Southern Sierra. Recreation is the path through which most people experience national forests and it is essential that management for — and impacts to — quality recreation experiences be at the forefront of forest planning. Historically, with the exception of a few focused areas, recreation has been treated as an afterthought — a side benefit of national forest lands after timber, grazing, mineral development, and fire management. However, recreation on our national forests doesn't occur in just a few focused areas. The growth in recreation, particularly dispersed recreation, means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the national forest.

Backcountry skiing, snowshoeing, climbing, paddling, and mountain biking are all activities with rapidly growing participation rates. According to the Outdoor Foundation's 2016 participation report<sup>4</sup> bicycling is among the most popular outdoor activities for both adults and children. Likewise, whitewater kayaking and backcountry skiing are among the fastest-growing outdoor activities, seeing 10% and 8% growth over the past three years, respectively. Traditional climbing, ice climbing, and mountaineering — activities that draw people to the High Sierra — have seen a 5.5% increase in participation over the past three years. This growth in outdoor recreation is encouraging because we see more people invested in caring about the places that provide these recreational experiences. At the same time, this growth brings a new urgency to the need to manage for sustainable recreation. With sustainable recreation management we can ensure that the National Forests provide opportunities for the recreating public to appreciate and enjoy public lands while at the same time ensuring that this enjoyment does not degrade the natural environment.

We appreciate that the draft plans and RDEIS specifically mention that the Sierra and Sequoia National Forests provide important opportunities for activities such as "mountain biking, paddling, climbing, cross country skiing and snowshoeing".<sup>5</sup> However, there is no mention in the draft plans of backcountry skiing (as distinct from cross country skiing and snowshoeing, as well as from developed downhill skiing), despite its increasing popularity as a dispersed recreation activity on each of these forests. Whitewater paddling (as distinct from flatwater kayaking, canoeing, and stand-up paddling) should also be added to the lists of popular activities provided on both forests. Furthermore, given the importance of these activities to the overall recreation values provided by these forests, mountain biking, whitewater paddling,

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<sup>3</sup> *Revised Draft Land Management Plan for the Sierra National Forest* (June 2019, p. 72); *Revised Draft Land Management Plan for the Sequoia National Forest* (June 2019, p. 74)

<sup>4</sup> Outdoor Foundation. 2016. Outdoor Recreation Participation Topline Report. Available at <http://www.outdoorfoundation.org/pdf/ResearchParticipation2016Topline.pdf>

<sup>5</sup> *Revised Draft Land Management Plan for the Sequoia National Forest* (June 2019, p. 3)



climbing, backcountry skiing, cross country skiing, snowshoeing, and family snowplay should all be added to the niche statement in each forest's draft plan.

Furthermore, beyond simply listing these activities in the plan introductions and niche statements for each forest, the final plans should specifically mention these recreation activities along with relevant plan components for sustainable recreation whenever there is an opportunity to do so. We very much look forward to site-specific and travel management planning (and implementation) that tiers directly from final revised forest plans, as well as ongoing improvements in the inventories and mapping of sustainable recreation infrastructure and opportunities on these forests. Along with these comments we have attached a complete geodataset containing updated data for climbing locations, mountain bike trails, popular backcountry ski zones, and whitewater runs on the Sierra and Sequoia National Forests, as well as collaboratively adjusted boundaries for the Alternative E BMA and RWA designations that we support.<sup>6</sup>

#### **A. Sustainable Recreation Plan Components: Objectives, Standards, and Guidelines**

While the forest-wide desired conditions related to sustainable recreation for the draft plans set worthy goals, and while we understand that long-range plans cannot dive too deeply into tactical prescriptions, objectives are meager with respect to recreation infrastructure management, and there is little in these draft plans that *specifically* describes what steps the Forest Service will take to achieve desired conditions.

In order to be effective, Desired Conditions must be supported with other required plan components, including specific objectives, standards and guidelines. Without a full complement of plan components, including measurable objectives that link plan components to monitoring and adaptive management, the plans do not provide a clear path to achieving the desired conditions.

To ensure that the Forest Service's sustainable recreation objectives and goals are met, the following plan components should be added to the Sustainable Recreation (Rec-FW-) sections of each final plan:

- **Desired condition:** Non-motorized recreation is promoted, allowed, and welcomed across the Forest in places where it is sustainable, through the activities that are sustainable, and to the extent that it is sustainable.
  - **Standard:** Foot travel, including on snowshoes, cross-country or backcountry skis, is allowed for cross-country travel unless an area is administratively closed to public access
  - **Standard:** Non-motorized boating, wading, and swimming is allowed on all water bodies, rivers, and stream reaches, unless area is administratively closed to public access
  - **Standard:** Rock climbing is a legitimate Wilderness and non-Wilderness activity, as is the conditional use of fixed climbing anchors as appropriate.
  - **Standard:** Mountain biking is a legitimate non-Wilderness activity, including in Backcountry Management Areas.
- **Desired Condition:** Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
- **Desired Condition:** The landscape is generally natural appearing and often includes historic or cultural features.

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<sup>6</sup> OutdoorAlliance\_ProposedRDEIS\_RecData\_20190925.zip

- **Desired Condition:** A full range of recreation settings is available, ranging from primitive, unroaded and challenging “backcountry” areas to roaded “frontcountry” settings which are easily travelled and convenient for connecting communities to the forest.
  - **Guideline:** Frontcountry areas (Destination Recreation Areas) provide initial contact points for forest users and developed recreation settings where people can engage in a variety of recreation activities including scenic driving, rock climbing, hiking, camping, picnicking, fishing, and boating.
  - **Guideline:** Backcountry areas (Challenging Backroad Areas) are mostly undeveloped places where people engage in a variety of more primitive recreation activities. Visitors rely on their outdoor skills and self-reliance as they engage in recreation activities.
  - **Guideline:** Main access corridors to Forest Service lands and contact points such as developed trailheads and observation points are maintained to standard and have information available and provide a transition and orientation place for forest users as they enter backcountry areas. Visitor use in these areas is moderate and disperses from these points.
- **Desired Condition:** Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.
  - **Guideline:** The Forest Service will work with local and national partners to educate users on best practices for reducing conflict and to sign shared use trails with information on trail etiquette and to promote responsible behavior.
  - **Guideline:** Wherever possible, the Forest Service will prioritize the development of partnerships with non-profit organizations, user/stakeholder groups, and local government entities whose missions complement the Forest Service’s mission and objectives.
  - **Standard:** Campground hosts and other private partners who interact with the public will be trained to provide interpretive services in addition to maintenance and administrative duties.
- **Desired Condition:** Recreation settings retain their natural character as development and populations in the region continue to grow and new forms of recreation emerge.
  - **Standard:** Design and construction of new projects must follow the assigned Recreation Opportunity Spectrum (ROS) classification for the specific management or geographic area location.
- **Desired Condition:** Rivers and streams provide exceptional non-motorized boating, fishing, and swimming opportunities featuring excellent water quality, intact riparian corridors, and opportunities to observe native biodiversity.
- **Objective:** Within 15 years of plan approval, develop, enhance, and maintain to standard 80 percent of the forests’ designated trail systems.
  - **Goal:** Collaborate with local mountain bike user groups and volunteers to improve and maintain to standard a connected and accessible network of sustainable purpose-built non-motorized mountain bike trails within appropriate Sustainable Recreation and Backcountry Management Areas.
  - **Guideline:** Work with local and national partners to educate users on best practices for reducing conflict and to sign shared use trails with information on trail etiquette and to promote responsible behavior.
  - **Potential Management Approach:** Collaborate with local mountain bike user groups and volunteers to improve and maintain to standard a connected and accessible network of sustainable purpose-built non-motorized mountain bike trails within appropriate Sustainable Recreation and Backcountry Management Areas.

- **Potential Management Approach:** Conduct non-motorized recreation activity planning where and when needed, looking for opportunities to connect singletrack loops, provide accessible options for mountain biking from communities, and complete routes in areas with high visitation.
- **Potential Management Approach:** Conduct non-motorized recreation activity planning, looking for opportunities to connect single-track loops, provide options for accessible mountain biking from local communities, and complete routes in Destination Recreation Areas and other areas with high visitation.
- **Potential Management Approach:** Use trailhead and camp hosts or volunteer patrollers, [add:] *including volunteer mountain bike patrollers*, to educate and interact with the public to promote responsible and sustainable public use practices.

#### *Engaging Partners to Help Find Solutions and Maintain Access*

We understand the need for certain areas of National Forest lands to be closed temporarily, or in rare occasions, on a permanent basis. Typically the need for closure is due to safety or ecological issues that cannot be mitigated. In the instances above where we outline a condition or standard “unless the area is administratively closed to public access,” we recommend that anytime the USFS contemplates a new closure, the agency consult with stakeholders who have a particular interest in the area or infrastructure that is being considered for closure. Additionally, the agency must review all closures on a periodic basis to determine whether they continue to be appropriate.

#### **B. Integration of Plan Components for Sustainable Recreation**

The 2012 planning rule requires that revised forest plans integrate sustainable recreation with other multiple use activities.<sup>7</sup> To meet this requirement, the Sierra and Sequoia plans must include sustainable recreation plan components, including standards and guidelines (not just desired conditions) that are integrated with plan components related to other uses. While the revised draft plans do strive to align recreation management actions with the recreation opportunity spectrum, there is still little to no integration between management actions for other multiple uses – such as fuels reduction projects or grazing – and sustainable recreation.

For instance, while desired conditions for Wilderness and Wild and Scenic Rivers include many plan components related to recreation, there is little integration between plan components related to other uses (such as riparian conservation areas and range, timber, and fire management) and sustainable recreation. Likewise, areas like the world-class Needles rock climbing area should be prioritized when considering wildfire mitigation as “key resources,” particularly considering the 2011 fire in the Needles. The Forest Service should use the Recreation Opportunity Spectrum (ROS) as well as other sustainable recreation objectives to integrate sustainable recreation management and opportunities with other elements of forest management.

The final EIS should explain how management direction across each forest, for each use, fits within the ROS setting for any particular area. Elaborating on what the different settings and characteristics for each ROS category are would be a good first step, as it is difficult for managers to attain a desired condition

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<sup>7</sup> 36 C.F.R. § 219.10(a)

without clear guidance on what that desired condition is. Likewise, specifying plan components that will help the Forests achieve the desired conditions associated with each ROS setting is necessary if ROS is to be a meaningful management tool. These details will also aid in helping the Forest Service understand how ROS is to be integrated with forest management actions.

By way of example, we appreciate the integrated forestwide goal (WTR-FW-GOAL-02) as stated under the Forests' preferred alternative B: "Take a landscape- or watershed-scale approach to restoring aquatic and riparian ecosystems, *integrating with recreation*, range management, fuels, and vegetation management to efficiently use limited resources, including partnerships, and to effectively address climate change."<sup>8</sup> Yet, neither of the draft plans contains specific plan components that integrate the ROS with riparian conservation areas. In order to fully integrate sustainable recreation with riparian conservation area management, the final plans must include plan components that directly connect the ROS with specific riparian conservation areas. For example, if campgrounds, roads, and trails can cause adverse impacts to riparian habitat, then certain riparian conservation areas might need to be classified either as semi-primitive non-motorized or primitive, and there should be associated plan components that move these areas towards this desired state.

We suggest the following additional plan components to better integrate sustainable recreation with other uses:

- **Standard:** Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.
- **Desired Condition:** Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted, to avoid, minimize, and/or mitigate those impacts, consistent with management area direction.
  - **Standard:** When developing projects, including meadow restoration and fuels reduction projects, the forest shall identify specific needs related to sustainable recreation and make them an explicit part of the project purpose and need.
  - **Guideline:** The Forest Service should coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts.

### C. Partnership/Stewardship

We appreciate that the RDEIS recognizes the need to work with volunteers and other partners to manage recreation use.<sup>9</sup> The range of plan components in each draft plan (VIPS-FW-) is also encouraging. To achieve desired conditions and goals, however, the Sierra and Sequoia National Forests will need to further incorporate specific objectives, standards and guidelines for how the forest will engage with partners and volunteers, and also invest in staff who are dedicated to working with partners. As many in the Forest Service already know, managing volunteers can be a time-consuming task, as can coordinating

<sup>8</sup> RDEIS volume 2, p. A-51; *Revised Draft Land Management Plan for the Sierra National Forest*, p. 118.

<sup>9</sup> See RDEIS, Volume 1, page 4: "There is a need to leverage our management direction, volunteerism, and partnership opportunities to achieve a balance between increasing visitation of renowned recreation sites and the related consequences of cultural resource impacts, overcrowding or conflicts in use, and impacts to natural resources, settings, and scenery."



with partners. The suggested plan components we have referenced above which address partners and volunteers, as well as further integration throughout the plan of Forest Service partnership objectives, standards and guidelines, can help the Sierra and Sequoia to focus on working with partners and volunteers in the coming years. We also suggest that each Forest find ways to hire a partnership coordinator if such a position does not already exist.

This is particularly relevant given one of the assumptions listed in the Sustainable Recreation topic section in the RDEIS (pages 559-60), “Operational funding for recreation will generally remain constant though management costs will continue to increase, and agency staffing will decline.” While we are dedicated to advocating for increased funding for the Forest Service at the Congressional level, we agree that this assumption is probably valid, at least in the near term.

#### **D. Diversity, Equity, and Inclusion in Recreation**

Each of the draft plans notes that both the Sequoia and Sierra National Forests are located “within a 4-hour drive of nearly half of more than 37 million people who make their homes in California” and that “[t]his populous pool of potential visitors is one of the most ethnically diverse in the world.” Therefore, it is essential that the revised plans are drafted with all constituents in mind. In addition to considering the diversity of nearby residents, the Forest Service should identify ways in which future management can result in more equitable access and enjoyment of the National Forests. Forest management should respect and acknowledge past stewards of these lands and encourage future stewards. Desired conditions, goals, objectives, and management approaches should be inclusive of people of all backgrounds.

One way in which the Inyo National Forest is seeking to create a more inclusive environment for area residents is by setting a goal of increasing the number of group picnic area and campsites in order to encourage extended families to visit the National Forest. This was a need identified by the Forest Service, recognizing that many Hispanic visitors are seeking this type of infrastructure and experience. The Forest Plans should also include objectives that will push the Forest Service to work more closely with other community groups, as well as with local tribes and Indigenous people. For example, beyond simply cataloging Native American artifacts as part of archeological surveys when implementing ground-disturbing projects, the Forest Service should actively seek out the people who are connected to this history and engage them in decision-making.

We suggest specifically adding Diversity, Equity and Inclusion plan components to the following forestwide goals:

- **Goal (REC-FW-GOAL)**
  - 04 Promote effective communication with gateway communities *and underserved communities, minorities, and urban youth* to help foster partnerships, inspire volunteers, educate the public, and support stewardship that contributes to funding, implementation of projects, and long-term maintenance of facilities.
- **Goal (VIPS-FW-GOAL)**
  - 01 Work with neighboring communities, *urban populations, youth, underserved communities*, organizations, state and local agencies, tribes, and other Federal agencies to sustain national forest benefits to people across the broader landscape.

## E. Rock Climbing and Fixed Anchor Management

Rock climbing is considered an appropriate form of recreation on national forests, and approximately 30% (about 10,000 climbing sites) of America's climbing resources are managed by USFS. Rock climbing presents USFS land managers with a unique set of management considerations as a result of activity-specific use patterns and equipment. The Sierra and Sequoia National Forests afford many exceptional and diverse climbing opportunities.

We recommend that the Sierra and Sequoia National Forest Plans include provisions that recognize rock climbing as a legitimate Wilderness and non-Wilderness activity, as well as legitimate inside and outside of the Sustainable Recreation Management Zones and Backcountry Management Zones, and the conditional use of fixed climbing anchors as appropriate. Fixed anchors, defined by the Access Fund and the USDA Forest Service<sup>10</sup> as climbing equipment (e.g. bolts, pitons, or slings) left in place to facilitate ascent or descent of technical terrain, are a critical component of a climber's safety system.

Well managed climbing areas provide forest visitors with exceptional recreation experiences. In order to achieve this goal, national forests should: 1) foster partnerships with the local climbing community, 2) develop strategies for human waste management, resource protection and erosion control, and 3) collaborate with local climbing organizations on education and stewardship initiatives.

## F. Energy

Provisions for energy within the Sequoia and Sierra Forest Plans need to be consistent with the tenants of "equal consideration" under the Federal Power Act Section 4(e) which includes the protection of recreational opportunities.<sup>11</sup> We suggest integrating recreation within the desired conditions and goals as follows:

- **Desired Condition (NRG-FW-DC)**
  - 01 Energy resources of National Forest System lands provide for the maximum public benefit that is compatible with protecting ecosystem integrity and the protection of *recreational opportunities*.
- **Goals (NRG-FW-GOAL)**
  - 04 When new hydroelectric developments are proposed, or relicensing occurs on existing developments, national forest personnel will coordinate with project proponents, State and other Federal Agencies to insure the protection of recreational opportunities.

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<sup>10</sup> See: Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiated rulemaking.

<sup>11</sup> *Federal Power Act*, Sec. 4e, As Amended Through P.L. 115-325, Enacted December 18, 2018: "...the Commission, in addition to the power and development purposes for which licenses are issued, shall give equal consideration to the purposes of energy conservation, the protection, mitigation of damage to, and enhancement of, fish and wildlife (including related spawning grounds and habitat), the protection of recreational opportunities, and the preservation of other aspects of environmental quality."

## G. Mountain Biking

Mountain biking is a popular activity on the Sierra and Sequoia National Forests, with a growing base of users, providing an important economic benefit to local communities and a means of access and connection to the forest for a broad range of stakeholders. Final plans on each forest should recognize this activity and benefits expressly and specifically. Plans should not only recognize the important social and economic benefit of mountain biking access and opportunities to local communities and to the broader public, but also acknowledge that a comprehensive and sustainable trail system must include a truly balanced range of motorized and non-motorized recreation opportunities, including, specifically, mountain biking opportunities within appropriate Sustainable Recreation Management Areas and Backcountry Management Areas (see *Designations and Settings: Recommended Wilderness Areas and Backcountry Management Areas* below).

Most of the trails that are open to mountain bikes on these forests were designed with other trail users in mind; OHV users, hikers, and equestrians all have access to purpose-built trails in these forests, but there are currently (especially on the Sierra National Forest) very few purpose-built mountain bike trails. Mountain bikers are thus left to use (and maintain) trails that were built with other users' needs in mind. The need to expand the network with purpose-built, multi-use single-track is critical to ensuring access to the type of experience that will "provide a high level of visitor satisfaction." We would therefore like to see specific language that promotes the development of purpose built mountain bike trails.

Final plans must also provide the necessary framework to maintain, improve, and expand non-motorized recreation access and connectivity where appropriate and sustainable, incorporating specific plan components (objectives, standards and guidelines) that adequately establish a process by which existing mountain bike access is maintained and enhanced wherever suitable, and integrating such management direction into other relevant forest-wide plan components, including watershed conditions, riparian and meadow restoration, and vegetation/fuels management is the approach that we suggest. For example, under *Management Areas > Sustainable Recreation*:<sup>12</sup>

- Incorporate specific Desired Conditions, Objectives, Standards, Guidelines and Potential Management Approaches for development and maintenance of sustainable mountain bike system trails within each recreation management area (Destination Recreation Area, General Recreation Areas and Challenging Backroad Areas).
- Define specific Desired Conditions, Objectives, Standards, Guidelines and Potential Management Approaches for mountain bike trails in Backcountry Management Area designations.

We also encourage the Sierra and Sequoia to consider additional direction around the management of around Class 1 electric assist mountain bikes (eMTBs). Given that all eMTBs by definition contain motors, the revised plans should specify that eMTB use is only suitable in motorized ROS settings. However, we support managing Class 1 eMTBs independently from traditional mountain bikes *and* independently from other motor vehicles. We suggest that the revised forest plans include direction for the Forests to designate motorized routes specifically for eMTBs.

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<sup>12</sup> Revised Draft Land Management Plan for the Sierra National Forest (June 2019, p. 71); Revised Draft Land Management Plan for the Sequoia National Forest (June 2019, p. 72)

## H. Trails

We are pleased to see the Forest Service recognizing as a Desired Condition “[a] sustainable system of trails [that] provides for opportunities that connect to a larger trail system, provides linkages from local communities to the national forest, and is planned, designed and managed to be compatible with other resources.”<sup>13</sup>

We would like to see the Forest Service further recognize the important social and economic benefits of such a trail system to local communities and to the broader public, and also to acknowledge that a comprehensive and sustainable trails system must include a balanced range of motorized and non-motorized recreation opportunities, including, specifically, mountain biking opportunities within appropriate Sustainable Recreation Management Areas and Backcountry Management Areas outside of designated or recommended Wilderness areas.

Furthermore, we are very supportive of and encouraged by specific language throughout the draft plans that aims to improve collaboration and productive partnerships between the Forest Service and local communities and user groups for the appropriate—and in many cases long overdue—enhancement, maintenance, and long-term stewardship of sustainable recreation infrastructure and facilities. We believe that these partnerships are paramount to achieving Desired Conditions such as those mentioned above.

We are glad to see the Forest Service set the following objective (REC-FW-OBJ): “Within 15 years of plan approval, maintain to standard 25 percent of the Sierra [and Sequoia] National Forest’s designated trail systems.”<sup>14</sup> We understand that given current staffing and funding levels this objective may seem ambitious. However, with significantly improved local partnerships, outside funding opportunities, volunteer resources, and better integration of trails infrastructure and opportunities into other project-level analysis and implementation, we believe we can do much better than just 25 percent.

To this end, we hope you will consider incorporating more specific language—along with particular goals, standards, guidelines and potential management approaches—regarding appropriate mountain biking opportunities and trails infrastructure, and also integrating such language into other relevant forestwide plan components, including watershed conditions, riparian and meadow restoration, and vegetation/fuels management.

For example, we suggest that the following plan components be added to final draft plans:

Under *Forestwide Components for Watershed Conditions (WTR-FW-)*:

- **Standard:** Where historic and current trails exist with potential adverse impacts to watershed quality and aquatic and riparian conditions, seek to engage partners and recreation user groups to assist in re-routing trails around sensitive areas so that they can be sustainably maintained to standard thereafter.

Under *Forestwide Components for Terrestrial Ecosystems (TERR-CES-FW-)*:

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<sup>13</sup> Revised Draft Land Management Plan for the Sierra National Forest (June 2019, p. 73); Revised Draft Land Management Plan for the Sequoia National Forest (June 2019, p. 74)

<sup>14</sup> Revised Draft Land Management Plan for the Sierra National Forest (June 2019, p. 73); Revised Draft Land Management Plan for the Sequoia National Forest (June 2019, p. 74)

- **Guideline:** Mechanical vegetation treatment projects should consider recreation facilities, infrastructure and opportunities, including trails, roads, signage, camping, climbing and parking areas as appropriate to the context of the landscape, watershed, wildlife, and forest health management scenarios.
  - **Potential Management Approach:** Work with partners to re-route, re-align or restore existing system trails as necessary during vegetation management projects to provide for better fire management solutions, to improve maintenance and connectivity of existing recreation infrastructure and trail systems, and to support sustainable recreation opportunities.

Under *Complex Early Seral Habitats*:

- **Guideline:** Post-disturbance restoration projects should be designed to optimize and enhance appropriate recreation opportunities and trail system infrastructure.

Under *Fire* (FIRE-FW-):

- **Potential Management Approach:** Where feasible and suitable, consider all available tools and methods to reduce vegetation buildup to lower the risk of unwanted wildfire, including grazing, mechanical treatment, system trail maintenance, prescribed fire, or wildfires managed to meet resource objectives.
- **Potential Management Approach:** Consider re-routing or re-aligning existing system trails to provide for better fire management solutions, to improve maintenance of existing recreation infrastructure, and to support sustainable recreation opportunities.

Under *Sustainable Recreation* (REC-FW-):

- **Goal:** Collaborate with local mountain bike user groups and volunteers to improve and maintain to standard a connected and accessible network of sustainable, purpose-built non-motorized mountain bike trails within appropriate Sustainable Recreation and Backcountry Management Areas.
- **Guideline:** Work with local and national partners to educate users on best practices for reducing conflict, to sign shared use trails with information on trail etiquette, and to promote responsible behavior.
  - **Potential Management Approach:** Collaborate with local mountain bike user groups and volunteers to improve and maintain to standard a connected and accessible network of sustainable, purpose-built non-motorized mountain bike trails within appropriate Sustainable Recreation and Backcountry Management Areas.
  - **Potential Management Approach:** Conduct non-motorized recreation activity planning where and when needed, looking for opportunities to connect singletrack loops, provide accessible options for mountain biking from communities, and complete routes in areas with high visitation.

- **Potential Management Approach:** Use trailhead and camp hosts or volunteer patrollers, *including volunteer mountain bike patrollers* [add], to educate and interact with the public to promote responsible and sustainable recreation use practices.

Under *Cultural Resources* (CULT-FW-):

- **Guideline:** Where existing or historic use trails are determined to impact cultural resources, engage partners to help implement appropriate re-routing or mitigation measures in order to maintain access and trail system connectivity.

Under *Infrastructure* (INFR-FW-):

- **Desired Condition:** Sustainable motorized and non-motorized trail networks allow for a wide variety of recreation opportunities and access with minimal adverse effects to wildlife, riparian and aquatic resources, or other forest uses.

## I. Non-motorized Winter Recreation

The Sierra and Sequoia National Forests provide many opportunities for non-motorized winter recreation, including snowshoeing, cross-country skiing, and backcountry skiing. These activities depend upon access to snow and can be enhanced by thoughtful over-snow vehicle (OSV) management that preserves accessible frontcountry areas for non-motorized winter recreation activities, balances recreation uses in the backcountry, and focuses OSV use in areas that receive enough snow to protect forest resources.

Forest Service travel management planning can be traced back to Executive Orders 11644 and 11989, which were issued by Presidents Nixon and Carter in 1972 and 1977, respectively. These orders were in response to the growing use of dirt bikes, snowmobiles, all-terrain vehicles, and other off-road vehicles (ORVs) and corresponding environmental damage and conflicts with non-motorized users. The executive orders require federal land management agencies to plan for ORV use to protect other resources and recreational uses. Specifically, the executive orders require that, when designating areas or trails available for ORV use, the agencies locate them to:

- (1) minimize damage to soil, watershed, vegetation, and other resources of the public lands;
- (2) minimize harassment of wildlife or significant disruption of wildlife habitats; and
- (3) minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, taking into account noise and other factors.<sup>15</sup>

Thirty-three years after President Nixon issued Executive Order 11644, the Bush Administration – citing unmanaged recreation as one of the top four threats facing the national forests – published the Travel Management Rule in 2005. The 2005 rule codified the executive order “minimization criteria”. The 2015 OSV Rule builds upon the 2005 Travel Management Rule by requiring that the Forest Service designate a system of areas and routes – *based on the minimization criteria* – where OSVs are permitted.<sup>16</sup>

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<sup>15</sup> Exec. Order No. 11,644, 37 Fed. Reg. 2877 (Feb. 8, 1972), as amended by Exec. Order No. 11,989, 42 Fed. Reg. 26,959 (May 24, 1977).

<sup>16</sup> 36 C.F.R. §§ 212.81, 261.14

The new rule requires each national forest unit with adequate snowfall to designate and display on an OSV use map a system of areas and routes where OSVs are permitted to travel; OSV use outside the designated system is prohibited.<sup>17</sup> Thus, rather than allowing OSV use largely by default wherever that use is not specifically prohibited, the rule changes the paradigm to a “closed unless designated open” management regime. Forests must apply and implement the minimization criteria when designating each area and trail where OSV use is permitted.<sup>18</sup> Any areas where cross-country OSV use is permitted must be “discrete, specifically delineated space[s] that [are] smaller . . . than a Ranger District” and located to minimize resource damage and conflicts with other recreational uses.<sup>19</sup>

In order to comply with Subpart C of the Travel Management Rule, the Sierra and Sequoia National Forests are required to undertake winter travel management planning to designate areas and trails for OSV use. The final EIS and final plans should articulate that the Recreation Opportunity Spectrum does not preclude travel planning decisions. The final plans should explain that site-specific travel planning is required to determine where within semi-primitive motorized, roaded natural, and rural areas OSV use will be allowed. Chapter 10§11.2 of the revised Travel Management Planning directives state “The Responsible Official generally should avoid including travel management decisions in land management plans prepared or revised under current planning regulations (36 CFR Part 219, Subpart A). If travel management decisions are approved simultaneously with a plan, plan amendment, or plan revision, the travel management decisions must be accompanied by appropriate environmental analysis.” Appropriate environmental analysis would include compliance with the minimization criteria, as described in 36 C.F.R. § 261.14. Given that application of the minimization criteria are not part of the process wherein Recreation Opportunity Spectrum (ROS) classifications are assigned, ROS classifications cannot serve a dual purpose as over-snow vehicle area designations.

Although the Forest Plans cannot make OSV use designations, they can, and should, set the stage for future travel management planning. A thoughtful, forward-looking, winter ROS map will define the contours of future winter travel planning (we will discuss details concerning winter ROS later in these comments). Critical big game winter range and other sensitive wildlife areas should be mapped as either primitive or semi-primitive non-motorized winter ROS in the revised forest plans. The forest plans can also set seasons for OSV recreation use, which can help protect soils and vegetation from early and late-season cross-country OSV use, when there may not be sufficient snow to protect these resources. The revised plans can also set forest-wide minimum snow depths for OSV use. We suggest a 12-inch minimum snow depth, as this is the snow depth being adopted by other forests across the Sierra, is the minimum snow depth set in the Eldorado forest plan, and the minimum snow depth required to protect historic resources (per an MOU between the Forest Service and the California State Historic Preservation Office). These types of forest-wide, programmatic direction are appropriate for forest plans and will simplify future winter travel management planning.

#### **J. Pacific Crest Trail**

The Pacific Crest Trail (PCT) is a globally valued resource that stretches from Canada to Mexico, passing through both the Sierra and Sequoia National Forests. Because many trail users traverse management

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<sup>17</sup> 36 C.F.R. §§ 212.81, 261.14

<sup>18</sup> 36 C.F.R. §§ 212.81(d), 212.55(b)

<sup>19</sup> 36 C.F.R. §§ 212.1, 212.81(d), 212.55(b)



jurisdictions, and expect the same recreational experience across the entire length of the trail, consistency in PCT management is important.

The way lands around the PCT are managed strongly shapes the trail experience. We are pleased that both Revised Draft Forest Plans comply with the new Forest Service 2012 Planning Rule and Directives that require forests to establish special management areas for National Scenic Trails. The National Trails System Act and recently developed Forest Planning Directives call for managing the PCT as a “Designated Area.” To do so, a geographic area of sufficient width surrounding the PCT must be established, with appropriate plan components, to assure that the PCT experience, including natural, cultural, scenic, and recreational values, is protected and enhanced. The most effective way to delineate this area is to use the Forest Service’s Scenery Management System definition of “foreground” for the width of the PCT Management Area. We are pleased that the Revised Draft Plans establish a corridor width of one-half mile on each side of the PCT and we encourage the Forests to “retain” this direction in the Final Plans.

Simply establishing a PCT Management Area is not enough. It is important that the plan components associated with this management area, and the boundaries of the management area itself, truly protect the nature and purpose of the PCT. We appreciate that the Forest Service’s introduction of the PCT Management Area describes a spectacular hiking and horseback riding experience worthy of National Scenic Trail status. However, we feel that given the importance of this statement, the Final Plans must also emphasize that the PCT is managed to be a rugged and protected corridor that is free from new development.

#### *Motorized Uses*

The PCT is a primitive, non-motorized backcountry path designed and managed for foot and horseback travel. The opportunity it provides for an extended retreat from modern-day life is a unique experience that has demonstrated worldwide appeal. Motorized use has always been prohibited on National Scenic Trails as directed by the Act.

Motorized use within the PCT Corridor should be contained to existing and authorized roads and trails. Further, new road construction in the PCT Corridor should only be allowed if it is the “only feasible and prudent alternative.” This will protect the trail from the impacts of motorized use occurring along the PCT. Specifically, we strongly support Standard 03 on page 101 of the Sequoia Revised Draft Plan which addresses new roads. However, we are not advocating for the closure of any existing and authorized motorized or bicycle-accessible roads or trails within the PCT Management Area.

#### *Scenery*

The Forest Service has a long-standing and well-developed system for managing scenery. The Scenery Management System provides a systematic approach for determining the value and importance of scenery on Forest Service lands. The system also provides a systematic approach to evaluating and describing impacts to the scenery from a given viewpoint. National Forest System Lands within the PCT Management Area must meet a Scenic Integrity Objective (SIO) of at least “High.” We support the language in both Revised Draft Forest Plans that all management activities in the PCT Management Area meet the SIO of at least “High” or “Very High.” Beyond the management area, we support the direction that lands viewed beyond the Management Area will meet a SIO of “moderate.”

#### *Group Events*



The popularity of large group and competitive events on trails has been growing in recent years. Benefits of such events to both participants and local communities are many, but the Pacific Crest Trail was designated as a National Scenic Trail with a different kind of purpose in mind. Therefore, we support the language in Alternative B in the Draft Forest Plans. Under this alternative, the forests propose no new large group or competitive events be allowed on the PCT.

#### *Utility Construction*

New communications sites and wind and solar generation facilities increase the footprint of industrialized civilization and severely disrupt the PCT experience. They should be prohibited within the PCT Management Area and should meet a Scenic Integrity Standard of Moderate when located elsewhere on forest lands but visible from the PCT. New utility corridors for power lines and pipelines should be restricted to areas of the trail already disrupted by current utility crossings or transportation infrastructure. Impacts from new development should be mitigated and meet the desired conditions for the PCT Management Area. We support language in the current draft preferred alternative regarding the PCT Management Area, specifically Standard 02 on page 101 of the Sequoia Revised Draft Plan.

#### *Vegetation Management*

Timber production is not appropriate as the primary goal of vegetation management projects within the PCT Management Area. Vegetation management or timber thinning projects with the primary goals of ecological restoration, fuels reduction, improving forest health, or increasing wildlife habitat, with a secondary result of timber production is acceptable in the PCT Management Area. Therefore, we suggest language be added to draft plans that states that timber production is not suitable in the PCT Management Area.

#### *Mineral Extraction*

Mineral extraction is one of the most disruptive potential uses within the PCT corridor. We support language in the draft plans prohibiting surface occupancy of these activities within the PCT Management Area.

## II. DESIGNATIONS AND SETTINGS

### A. Whitewater Recreation and Wild and Scenic Rivers Study Process

Overall, the Sequoia National Forest inventory of eligible rivers and streams was substantially improved in the 2019 draft plan. Eligible river miles increased from 75 miles in the 2016 draft plan to 341 miles in response to public comments. However, the Sierra National Forest inventory is a huge step backwards: eligible Wild & Scenic River miles decreased by more than 500% from 640 miles in 2016 to just 35.5 miles in 2019.

The revised draft land management plans for both the Sequoia and Sierra National forests cite a standard for the Wild and Scenic River Management Area (MA-EWSR-STD) directing them to manage identified eligible or recommended suitable rivers to protect for outstandingly remarkable values (ORV). Therefore, during the Wild & Scenic Rivers Study Process we feel it is of key importance to evaluate all the rivers with the potential to have whitewater recreation ORVs.

During the assessment and development period, American Whitewater identified for the USFS, 16 watersheds containing more than 228 river miles that had potential outstandingly remarkable values based on whitewater recreation. Yet during the Wild & Scenic Rivers Study Process, 75% or 172 river miles were left out of the evaluation for their whitewater merits. (See Table 1 detailing the evaluation of identified whitewater resources) We applaud the fuller consideration of whitewater resources within the Sequoia Plan and in the Wild and Scenic Rivers Study Process which evaluated 46 of the 60 identified whitewater river miles. However, we remain deeply concerned about the lack of consideration in the Sierra, which only evaluated whitewater recreation on 10 of the 168 identified river miles. Furthermore, the Sierra National Forest found these 10 miles to be ineligible citing an unidentified similar area that exists elsewhere in the region of comparison.

We note a striking difference between how the Sequoia and the Sierra plans approached whitewater recreation within the plans themselves and during the Wild & Scenic Rivers Study Process which may have led to an imbalance in consideration. The divergence is first recognized in the sustainable recreation niche statements in each plan which describe what the National Forest “has to offer in terms of special places, opportunities and potential experiences, overlapped with what people desire and expect in terms of outdoor recreation from public lands.” Whereas, the Sequoia niche statement calls out “world class whitewater”, the Sierra leaves unmentioned the multitude of whitewater recreation opportunities found within its boundary. Indeed, not only is whitewater overlooked, the word “river” is nowhere to be found in the Sierra niche statement.

More worrisome, is a difference in approach that each interdisciplinary (ID) team took when determining if any river-related values are outstandingly remarkable. The Sequoia ID team built upon baseline criteria for Outstandingly Remarkable Values (ORV) and identified additional benchmarks they deemed specific to their forest.<sup>20</sup> The Sierra ID team worked off of baseline criteria and did not detail Sierra specific values.<sup>21</sup> Additionally, though we lack the ability to review the working documents of each ID team to verify processes, it appears the ID teams differed in how they set the bar for outstandingly remarkable values. We note here that the Wild and Scenic Rivers Process details an ORV must be river-related and

<sup>20</sup> Revised Draft Environmental Impact Statement Revision of the Sequoia and Sierra National Forests Land Management Plans – Vol 2 Appendix C Page C-21

<sup>21</sup> Ibid C-129



determined to be a unique, rare *or* (emphasis added) exemplary feature that is significant regionally and nationally. It is not a requirement to be all three – unique, rare and exemplary.

Since a significant amount of whitewater recreation occurs within the Sierra National Forest boundaries, we ask the Forest to reevaluate their niche statement and consider highlighting these exceptional river resources. We ask that the Sierra National Forest ID team complete evaluations on all the river miles identified by American Whitewater for a whitewater recreation Outstandingly Remarkable Value. The ID team should take a watershed approach identifying full streams as eligible rather than disconnected segments paying specific attention to world class whitewater found on Dinkey Creek, the Middle Fork San Joaquin which completes the lower half of the Devil's Postpile whitewater run and the San Joaquin River which will have reliable recreational flows provided through hydropower relicensing.

To assist in this endeavor, where available we provide links to the National Whitewater Inventory found on American Whitewater's website.<sup>22</sup> (See Table 2) We also encourage the ID team to run a “desktop” search of each whitewater resource on the internet to see firsthand descriptions, pictures and videos. We recommend, in addition to ORV baseline criteria, that specific Sierra National Forest criteria be considered, developed and detailed within the Wild and Scenic Rivers Study Process as it was done for the Sequoia. Finally, upon evaluation when citing the existence of similar resources within a Region of Comparison as in the case of the San Joaquin River, we ask that the similar river resource and location be identified.<sup>23</sup>

Within, the Sequoia we ask the Forest to reevaluate the South Fork Middle Fork Tule for a whitewater recreation ORV. While it has been found eligible based on other values, the whitewater recreation value is dismissed having “only a small number of whitewater kayakers capable of safely navigating this creek”. We note that the Camp Nelson to Springville/Globe reach on the SF MF Tule is identified by whitewater paddlers as a world class experience. Additionally, small use numbers are indicative of extreme boating but does not negate the exceptional whitewater experience that advanced paddlers can enjoy.

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<sup>22</sup> The American Whitewater National Whitewater Inventory is a crowdsourced and dynamic online database and guide to over 5,500 whitewater runs across the U.S. and beyond. It is infused with the local knowledge of volunteer paddlers who share river descriptions, flow preferences, access tips, hazard alerts, photos, and more. The database serves as a resource for paddlers but also provides information for river managers and partners. <https://www.americanwhitewater.org/content/StreamTeam/info/>

<sup>23</sup> *Revised Draft Environmental Impact Statement Revision of the Sequoia and Sierra National Forests Land Management Plans – Vol 2 Appendix C Page C-207*

Table 1: Identified Whitewater Recreational Resources

Table 1 - Sequoia Sierra National Forest  
Stakeholder Identified Whitewater Recreation

River	Forest Plan	Appendix Page #	GIS	Miles Studied	W&S Eligible	WWR Miles	WWR Considered
Brush Creek	Sequoia	C 31	2.3	9.9	Yes	1.4	Yes
Dry Meadow	Sequoia	C 44	270.2	2.6	Yes	1.8	Yes
Kern	Sequoia	C 58	2.104.2	7.4	Yes	8	Yes
Kern	Sequoia	C 59	2.104.3	12.7	Yes	11	Yes
Kern	Sequoia	C 61	1.104.4	11.5	Yes	8.7	No
Kings	Sequoia	C 63	2.106.1	3.9	Yes	9.9	Yes
Kings	Sequoia	C 64	2.106.2	7.5	Yes	7.5	Yes
Kings	Sequoia	C 66	2.106.3	1.3	Yes	1.3	Yes
South Fork of the Middle Fork Tule	Sequoia	C 106	2.213	12	Yes	6	No
South Fork of the Middle Fork Tule	Sequoia	C 83	2.138	4.8	Yes	4.8	Yes - but found ineligible
Bear Creek	Sierra	C 134	3.11	11.4	No	5.6	No
Big Creek	Sierra	C 137	3.20.2	6	No	3	No
Dinkey Creek	Sierra	C 151	3.68.3	6.9	No	3	No
Dinkey Creek	Sierra	Not Evaluated	3.68.5	7.1	Not Evaluated	1	Not Evaluated
Dinkey Creek	Sierra	C 153	3.68.4	4	Yes	4	No
Dinkey Creek	Sierra		3.68.6	6.6	Not Evaluated	6.4	Not Evaluated
Granite Creek	Sierra	C 165	3.107.1	2.6	No	2.6	No
Granite Creek	Sierra	C 165	3.107.2	2	No	2	No
Middle Fork San Joaquin	Sierra	C 231	Segment 4	9	Yes	32.5	No
Mono Creek	Sierra	C 184	3.166.4	6.2	No	5.8	No
Mono Creek	Sierra	C 183	3.166.2	9.9	Yes	6.7	No
North Fork Kings	Sierra	C 188	3.177.2	15.6	No	6.8	No
North Fork Kings	Sierra	C 199	3.177.8	4.9	No	1.7	No
North Fork Kings	Sierra	C 199	3.177.8	4.9	No	3.1	No
Piute Creek	Sierra	C 196	3.199.2	11	No	9	No
Piute Creek	Sierra	C 197	3.199.3	0.6	No	0.6	No
San Joaquin	Sierra	C 207	3.233.1	1	No	1	No
San Joaquin	Sierra	C 208	3.233.4	7.1	No	8.3	No
San Joaquin	Sierra	C 207	3.233.3	8.5	No	10.4	Yes
South Fork San Joaquin River	Sierra	C 218	3.260.2	28	No	31	No
South Fork San Joaquin River	Sierra	C 218	3.260.2	28	No	6.3	No
South Fork San Joaquin River	Sierra	C 231	Segments 2,3,4	7	Yes	7.6	No
West Fork Granite Creek	Sierra	C 225	3.294.2	5.8	No	2.3	No
San Joaquin	Sierra	C 209	3.233.6	7.2	No	7	No
<b>Total WWR Miles</b>						<b>228.1</b>	

Table 2: Sierra National Forest Whitewater Recreation

Sierra National Forest Whitewater Recreation

River	Appendix Page #	GIS	WWR Miles	WWR Considered	WWB Reach	AW National River Inventory Link
Bear Creek	C 134	3.11	5.6	No	Pacific Crest Trail to Bear Diversion Dam	<a href="https://www.americanwhitewater.org/content/River/detail/id/6339/">https://www.americanwhitewater.org/content/River/detail/id/6339/</a>
Big Creek	C 137	3.20.2	3	No	First 3 Miles Fish Camp to SF Merced	<a href="https://www.americanwhitewater.org/content/River/detail/id/4772/">https://www.americanwhitewater.org/content/River/detail/id/4772/</a>
Dinkey Creek	C 151	3.68.3	3	No	Dinkey Dome to Dinkey Campgrounds	<a href="https://www.americanwhitewater.org/content/River/detail/id/3960/">https://www.americanwhitewater.org/content/River/detail/id/3960/</a>
Dinkey Creek	Not Evaluated	3.68.5	1	Not Evaluated	Includes Last Mile to Dinkey Campground to logging spur road	<a href="https://www.americanwhitewater.org/content/River/detail/id/177/">https://www.americanwhitewater.org/content/River/detail/id/177/</a>
Dinkey Creek	C 153	3.68.4	4	No	Dinkey Campground to logging spur road	<a href="https://www.americanwhitewater.org/content/River/detail/id/177/">https://www.americanwhitewater.org/content/River/detail/id/177/</a>
Dinkey Creek		3.68.6	6.4	Not Evaluated	Ross Creek Trail to Confluence of NF Kings	<a href="https://www.americanwhitewater.org/content/River/detail/id/179/">https://www.americanwhitewater.org/content/River/detail/id/179/</a>
Granite Creek	C 165	3.107.1	2.6	No	Strawberry Mine to Near Cassidy Trail	<a href="https://www.americanwhitewater.org/content/River/detail/id/4591/">https://www.americanwhitewater.org/content/River/detail/id/4591/</a>
Granite Creek	C 165	3.107.2	2	No	Strawberry Mine to Near Cassidy Trail	<a href="https://www.americanwhitewater.org/content/River/detail/id/4591/">https://www.americanwhitewater.org/content/River/detail/id/4591/</a>
West Fork Granite Creek	C 225	3.294.2	2.3	No	Strawberry Mine to Near Cassidy Trail	<a href="https://www.americanwhitewater.org/content/River/detail/id/4591/">https://www.americanwhitewater.org/content/River/detail/id/4591/</a>
Middle Fork San Joaquin	C 231	Segment 4	32.5	No	Devil's Postpile Nat'l Monument to Mammoth Pool Reservoir	<a href="https://www.americanwhitewater.org/content/River/detail/id/290/">https://www.americanwhitewater.org/content/River/detail/id/290/</a>
Mono Creek	C 184	3.166.4	5.8	No	Mono Diversion to SF San Joaquin	<a href="https://www.americanwhitewater.org/content/River/detail/id/4790/">https://www.americanwhitewater.org/content/River/detail/id/4790/</a>
Mono Creek	C 183	3.166.2	6.7	No	First Reches to Lake Edison	<a href="https://www.americanwhitewater.org/content/River/detail/id/6260/">https://www.americanwhitewater.org/content/River/detail/id/6260/</a>
North Fork Kings	C 188	3.177.2	6.8	No	Above Whison Reservoir	<a href="https://www.americanwhitewater.org/content/River/detail/id/1723/">https://www.americanwhitewater.org/content/River/detail/id/1723/</a>
North Fork Kings	C 199	3.177.8	1.7	No	Balch Afterbay to Confluence w/Dinkey Creek	<a href="https://www.americanwhitewater.org/content/River/detail/id/229/">https://www.americanwhitewater.org/content/River/detail/id/229/</a>
North Fork Kings	C 199	3.177.8	3.1	No	Dinkey Creek to Main Kings Confluence	<a href="https://www.americanwhitewater.org/content/River/detail/id/228/">https://www.americanwhitewater.org/content/River/detail/id/228/</a>
Piute Creek	C 196	3.199.2	9	No	Below Golden Trout Lake to Confluence with South Fork San Joaquin	
Piute Creek	C 197	3.199.3	0.6	No	Below Golden Trout Lake to Confluence with South Fork San Joaquin	
San Joaquin	C 207	3.233.1	1	No	Part of Devil's Postpile National Monument to Mammoth Pool	<a href="https://www.americanwhitewater.org/content/River/detail/id/290/">https://www.americanwhitewater.org/content/River/detail/id/290/</a>
San Joaquin	C 208	3.233.4	8.3	No	Chawankake Gorge	<a href="https://www.americanwhitewater.org/content/River/detail/id/289/">https://www.americanwhitewater.org/content/River/detail/id/289/</a>
San Joaquin	C 209	3.233.6	7	No	Horseshoe Bend	<a href="https://www.americanwhitewater.org/content/River/detail/id/287/">https://www.americanwhitewater.org/content/River/detail/id/287/</a>
South Fork San Joaquin River	C 218	3.260.2	31	No	Mono Hot Springs to Middle Fork, to Mammoth Pool	<a href="https://www.americanwhitewater.org/content/River/detail/id/6378/">https://www.americanwhitewater.org/content/River/detail/id/6378/</a>
South Fork San Joaquin River	C 218	3.260.2	6.3	No	Florence Lake to Mono Hot Springs	<a href="https://www.americanwhitewater.org/content/River/detail/id/291/">https://www.americanwhitewater.org/content/River/detail/id/291/</a>
South Fork San Joaquin River	C 231	Segments 2,3,4	7.6	No	Bridge over Piute Creek to Florence Lake	<a href="https://www.americanwhitewater.org/content/River/detail/id/292/">https://www.americanwhitewater.org/content/River/detail/id/292/</a>

## B. Recreation Opportunity Spectrum

Many factors influence why recreationists are drawn to particular areas of the forest. Natural features such as mountains, cliff faces, and navigable waterways are important. So too are topographic and climate conditions that lead to ample winter snows in one area and dry trails for early season riding in another. The Recreation Opportunity Spectrum (ROS), however, is an important tool for managing use and development, and setting user expectations, across the Forests. As far as forest plan components go, the ROS is among the most important elements of the plan for determining how the public will experience the forest in the future. For these reasons, we take a particular interest in how the DEIS approaches the ROS.

The Forest Service is required to use the Recreation Opportunity Spectrum (ROS) to integrate recreation with other resource values to derive sustainable recreation outcomes and it is the best tool the Forest Service has for forest-scale planning.<sup>24</sup> Although the different ROS classes are described on pages 561-2 of the RDEIS, there is nothing in the draft plans that actually describes the characteristics of different ROS settings or associated plan components to achieve the desired ROS settings. The Planning Rule requires that a plan “must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses,” including outdoor recreation.<sup>25</sup> Likewise, the 2012 Planning Rule states that plans “must include plan components, including standards or guidelines, to provide for sustainable recreation,” including “[s]pecific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired [ROS] classes.”<sup>26</sup>

We recommend the Sierra and Sequoia incorporate the ROS setting characteristics and plan component examples developed by the Washington Office as tools for creating plan components based on ROS classes (summer and winter).<sup>27</sup> These tables are part of a larger effort by the Washington office to update the recreation planning directives and are still in draft form. The Sierra and Sequoia could also follow the example set by the Flathead National Forest, whose draft plan includes plan components that describe the settings, appropriate uses, and other details associated with the ROS.<sup>28</sup>

We continue to be disappointed that these revised draft plans do not contain winter-specific ROS language. Although the desired conditions for sustainable recreation specify that recreation settings will “provide a range of opportunities as described in the recreation opportunity spectrum,” the draft plans still fail to recognize that winter presents unique opportunities and challenges for reaching that desired condition. When snow covers the landscape, recreation opportunities, settings, and access change dramatically across the forests. Some areas become less accessible and take on a more remote feel than in summer. This change means that some areas that are classified as roaded natural or semi-primitive motorized in summer change to semi-primitive non-motorized. Other areas which are non-motorized in summer may be suitable for over-snow vehicles. Although the full range of ROS settings are still evident on the forests in winter, the location, distribution, and total acreage of each setting changes significantly.

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<sup>24</sup> FSH 1909.12

<sup>25</sup> 36 C.F.R. § 219.10(a)

<sup>26</sup> FSH 1909.12, ch. 20, § 23.23a(2)(g)

<sup>27</sup> See Exhibits A and B

<sup>28</sup> Flathead National Forest draft plan, pages 60-63

Given the distinct differences in use, access, and setting on the Sierra and Sequoia during winter versus summer, the revised plans should include separate recreation opportunity spectrum classifications for summer and winter. In addition, winter ROS settings will set the stage for winter travel planning, required under the 2015 Over-Snow Vehicle Rule, by helping the Forest Service better define where over-snow vehicle use is and is not suitable. Incorporating winter and summer ROS settings is a step that another early adopter of the 2012 planning rule, the Flathead National Forest, has taken, and we suggest looking to the Flathead for language related to winter recreation. Based on the winter recreation language in the Flathead draft plan,<sup>29</sup> we suggest the following:

- **Desired Condition:** Winter recreation settings provide a range of opportunities as described by the recreation opportunity spectrum.
- **Desired Condition:** Winter primitive recreation opportunity spectrum settings are large, remote, wild, and predominantly unmodified. Winter primitive recreation opportunity spectrum settings provide quiet solitude away from roads and people. There is no motorized activity and little probability of seeing other people. Constructed trails that are evident in the summer months are covered by snow, making these settings appear even more natural and untouched by human management.
  - **Standard:** Over-snow vehicle use is not permitted in primitive areas.
- **Desired Condition:** Winter semi-primitive non-motorized recreation opportunity spectrum settings provide backcountry skiing, splitboarding, Nordic skiing, fatbiking and snowshoeing opportunities. Trails are un-groomed and often not marked. Rustic facilities, such as historic cabins and yurts may exist but are rare.
  - **Standard:** Over-snow vehicle use is not permitted in semi-primitive non-motorized areas.
- **Desired Condition:** Winter semi-primitive motorized recreation opportunity spectrum settings provide backcountry skiing, splitboarding, Nordic skiing, snowshoeing, fatbiking, and snowmobiling opportunities. Routes are typically un-groomed but are often signed and marked. In designated areas there are vast opportunities to travel cross-country, offering visitors an opportunity for exploration and challenge. Occasionally, historic rental cabins are available for overnight use and warming huts are available for short breaks.
  - **Objective:** Site-specific winter travel planning will be initiated and completed within 3 years of plan implementation to designate specific routes and areas within rural ROS areas where over-snow vehicle use is allowed.
- **Desired Condition:** Winter roaded natural recreation opportunity spectrum settings support higher concentrations of use, user comfort, and social interaction. The road system is plowed and accommodates vehicle travel. Winter trails are routinely groomed and may have ancillary facilities such as warming huts and restrooms. System roads and trails often provide staging to adjacent backcountry settings (primitive, semi-primitive non-motorized, semi-primitive motorized). Guided winter recreation activities may also be present.
  - **Objective:** Site-specific winter travel planning will be initiated and completed within 3 years of plan implementation to designate specific routes and areas within rural ROS areas where over-snow vehicle use is allowed.
- **Desired Condition:** Winter rural recreation opportunity spectrum settings provide high-use developed recreation areas. These areas are accessed from paved and plowed roads and are generally close to population centers. User comfort facilities such as toilets, restaurants, heated

<sup>29</sup> Flathead National Forest draft plan, page 63

shelter facilities, and information and education are commonly present. Parking areas are large and plowed. Entry points and routes are signed and direct over-snow vehicles to adjacent roaded natural and semi-primitive motorized settings. Non-motorized trails are also typically groomed for Nordic skiing and fatbiking. Rural winter settings provide access for communities and families to celebrate holidays, conduct racing events, and skiing.

- **Objective:** Site-specific winter travel planning will be initiated within one year of plan implementation to designate specific routes and areas within rural ROS areas where over-snow vehicle use is allowed.
- **Standard:** Over-snow vehicle use is not permitted off of designated routes and areas within rural ROS areas.

Finally, the revised forest plan should include plan components to help guide the Sierra and Sequoia towards achieving their desired ROS. These should include the following standards and objectives:

- **Standard:** Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.
- **Standard:** Design and construction of new projects must follow the assigned Recreation Opportunity Spectrum (ROS) classification for the specific management or geographic area location.
- **Objective:** Initiate winter travel management planning within 1 year of the completion of the revised forest plans to designate routes and areas for winter motorized use.
- **Objective:** Remove at least 5 unauthorized motorized routes in non-motorized settings each year.

Specific to the PCT, attention should be given to the primitive quality of the user experience rather than the strict spatial guidelines of the Recreation Opportunity Spectrum direction. A more restrictive Recreation Opportunity Spectrum class overlaying the PCT Management Area will help to protect the PCT experience into the future, especially if incompatible uses exert pressure on the PCT and surrounding lands.

### C. Sustainable Recreation Management Areas

Designating Sustainable Recreation Management Areas is a way for the forest plans to address specific areas that are highly valued for recreation, where stakeholders do not want to see the areas change in noticeable or substantial ways, but where recommended Wilderness is not the appropriate tool to protect them. These designations also can help the Forest Service manage impacts and visitor use conflict in areas that receive high use and/or where many different recreation uses are concentrated. These areas require special management direction to ensure that recreation within them is sustainable – both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment. We suggest the following plan components related to special recreation management areas:

- **Desired condition:** Places of special recreational significance are recognized as Sustainable Recreation Areas and managed to protect their unique settings and the sustainable place-based activities they support. Examples include climbing areas, backcountry skiing or paddling destinations, and trails recognized as exemplary for mountain biking or hiking.

- **Standard:** Sustainable Recreation Management Areas shall be managed in accordance with the appropriate ROS setting necessary to protect their unique recreational experience.
- **Guideline:** Fire management within Sustainable Recreation Management Areas should strive to protect and preserve recreation infrastructure.
- **Guideline:** The Forest Service should work with local and national partners to maintain and develop the recreation infrastructure (trails, river access sites, climbing anchors, and winter trailheads) necessary for the public to access and enjoy sustainable recreation management areas.

In addition to forest-wide plan components for Sustainable Recreation Management Areas (SRMA), the revised forest plans should include management direction unique to each SRMA, including measurable objectives that link plan components to monitoring and adaptive management. This direction should address the specific issues that either currently exist or are foreseeable. These may be travel management goals (i.e. remove or bring to standard X number of unauthorized routes within a specific area), infrastructure goals (i.e. construct a new campground or staging area), conservation-related direction (i.e. ensure recreation facilities are not located in — or relocated from — sensitive habitat areas), or otherwise.

#### **D. Inventoried Roadless Areas**

Roadless areas are incredibly important for forest ecological health and provide high-value backcountry recreation opportunities. We appreciate that the draft plans contain suitability components that ensure roadless areas will be managed in accordance with the 2001 Roadless Area Conservation Rule. In addition to the plan components currently in the draft plans, we suggest adding:

- **Desired Condition:** Inventoried Roadless Areas provide large, relatively undisturbed landscapes with high scenic quality that are important for backcountry recreation where visitors feel as if they are in a natural place devoid of roads where they can explore, observe nature, and challenge themselves. Because these lands are minimally disturbed, they provide clean drinking water and function as biological strongholds for populations of at-risk wildlife and plants. They also serve as buffers against the spread of non-native invasive plant species and serve as reference areas for study and research.
- **Desired Condition:** Management activities conducted within Inventoried Roadless Areas should be consistent with the scenic integrity objective of High or Very High.
- **Desired Condition:** When developing the proposed action for projects within Inventoried Roadless Areas, consider conducting restorative activities such as road decommissioning and reclamation within the project area to move towards desired conditions.

#### **E. Recommended Wilderness and Backcountry Management Areas**

Outdoor Alliance is fully supportive of preserving wilderness characteristics where appropriate and where recommended designations do not remove or restrict access to existing non-motorized recreation infrastructure and opportunities (eg. rock climbing areas and mountain bike trails). While recreational features like bolt-intensive climbing areas and mountain bike trails make recommended Wilderness an inappropriate management prescription, the Forest Service should employ other management prescriptions such as the Backcountry Management Area concept outlined in Alternative E to ensure that

Wilderness values are protected through other means while continuing to allow for non-Wilderness-compliant forms of sustainable recreation.

Currently, it is difficult to assess the proposed Wilderness recommendations given the pending status of Forest Service Manual (FSM) 2320. Without official guidance from pending FSM 2320 we are forced to take a conservative approach in our recommendations because we do not know how specific recreation activities will be managed in Wilderness areas under a revised FSM 2320. Furthermore, considering the lack of national-level Forest Service guidance on the use and placement of fixed anchors in Wilderness (presumed to be issued through the forthcoming FSM 2320), and the fact that there are many dispersed recreation resources in the Revised Draft Plan's recommended Wilderness areas (especially in Alternative C), it is important that the Forest Service is aware of the locations of important recreation resources to ensure that appropriate management prescriptions and designations enhance these nationally-significant recreation opportunities.

#### *Recreation Inventory Concerns*

Given the problems with the Wild and Scenic Rivers recommendation process outlined above, we are also concerned about other elements of the planning process—particularly related to efforts to 1) inventory and classify other recreation opportunities and infrastructure (existing and potential), and 2) incorporate this inventory into the new plans. The 2012 Forest Planning Rule requires that Wild and Scenic Rivers be evaluated, and the process is outlined in agency manuals and handbooks. Likewise, the 2012 rule makes it clear that public participation is an essential element to the plan revision process. Despite these requirements, however, recognition of American Whitewater's input in regards to Wild and Scenic Rivers has been superficial at best, raising questions about whether the Forest Service has done an adequate job of considering other recreation opportunities.

Inventory requirements for climbing areas, backcountry ski zones, mountain bike trails, and other dispersed recreation opportunities are less clearly articulated in the rule. However, we understand based on the Planning Rule and from Forest Service staff that understanding and managing all recreational resources is essential to meeting the goal of sustainable recreation, and we feel uncertain as to whether the Forest Service has considered and integrated comments that relate to other recreational resources. For example, the American Alpine Club and the Access Fund have repeatedly emphasized the importance of climbing areas as valuable resources, suggested the Forest Service clearly state that climbing is an appropriate activity across all three forests, and asked that the draft plans provide clear direction on fixed anchors. Yet, Alternative C includes the Southwest Golden Trout Wilderness Addition on the Sequoia National Forest as recommended Wilderness, but the DEIS does not analyze or even mention how this designation would affect climbing despite that this area is home to the Needles—an internationally renowned climbing area. Without clear direction in the plans on anchor and bolt replacement policies, and recognition that climbing is an appropriate activity in Wilderness and non-Wilderness areas alike, recommending the Golden Trout Wilderness Addition could potentially conflict with a popular and historic recreation use within this area.

That said, we have worked collaboratively with conservation partners and recreation stakeholders to further inventory non-motorized recreation opportunities and infrastructure, and to create a proposal for protecting roadless areas across the two forests, a proposal that we feel provides a good model for balancing management of Wilderness and recreation resources in a forest plan revision. The proposal includes 1) a set of carefully drawn RWA boundaries that avoid mountain bike trails, developed climbing areas, and most motorized trails on potential RWAs, including Devils Gulch 1, Devils Gulch 2, Devils



Gulch 3, Ferguson Ridge, Ansel Adams Wilderness Addition, Sycamore Springs, John Muir Wilderness Additions – Southwest, Monarch Wilderness Addition – West, Monarch Wilderness Kings River Addition, Oat Mountain, Golden Trout Wilderness Addition, and Domeland Wilderness Addition; and 2) a concept for BMAs intended to protect roadless character while allowing for a wider variety of recreational activities than recommended Wilderness.

As mentioned above, along with these comments we have also attached a complete geodataset containing updated data for climbing locations, mountain bike trails, popular backcountry ski zones, and whitewater runs on the Sierra and Sequoia National Forests, as well as collaboratively adjusted boundaries for the Alternative E BMA and RWA designations that we support.<sup>30</sup> While we feel that more specific management prescriptions and plan components for BMAs, including specific objectives, standards and guidelines, should be included in the final plans, we support the “select permitted/prohibited uses in backcountry management areas” as outlined in the following table (“Table 1”) as proposed in a joint letter to the Sierra National Forest from Sierra Forest Legacy et al. on April 9, 2019:<sup>31</sup>

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<sup>30</sup> OutdoorAlliance\_ProposedRDEIS\_RecData\_20190925.zip

<sup>31</sup> [https://www.sierraforestlegacy.org/Resources/Conservation/ProjectsPlans/ForestPlanRevisions/SupportLetterRWA\\_4-9-2018.pdf](https://www.sierraforestlegacy.org/Resources/Conservation/ProjectsPlans/ForestPlanRevisions/SupportLetterRWA_4-9-2018.pdf)

**Table 1: Select Permitted/Prohibited Uses in Backcountry Management Areas**

<b>Select Permitted Uses</b>	<b>Select Prohibited Uses</b>
<ul style="list-style-type: none"> <li>*Non-motorized recreation including hunting, mountain biking, camping, and horseback riding</li> <li>*Off-highway vehicle (OHV) and over-snow vehicle (OSV) use on designated Motor Vehicle Use Map (MVUM) routes</li> <li>*The maintenance of designated MVUM routes and construction of new non-motorized trails</li> <li>*Forest management activities including management of existing plantations, hazard tree felling, as well as removal and sale of generally small-diameter material to improve threatened, endangered, proposed, or sensitive species habitat or to maintain or restore characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period. Such activities must be infrequent and are only allowed if they maintain or improve the roadless area characteristics of the BMA.</li> <li>*Prescribed and managed fire use, as well as fire suppression activities</li> <li>*Habitat restoration projects for sensitive plant or wildlife species</li> <li>*Restoration activities (such as road decommissioning)</li> <li>*Commercial livestock grazing</li> <li>*Mining on existing valid claims</li> <li>*Collecting firewood and non-timber products</li> </ul>	<ul style="list-style-type: none"> <li>*New road construction or reconstruction, except for minor reroutes to prevent irreparable resource damage or improve safety</li> <li>*New OHV or OSV route construction or reconstruction, except for minor reroutes to prevent irreparable resource damage or improve safety</li> <li>*Forest management for purposes other than for improving threatened, endangered, proposed, or sensitive species habitat or maintaining or restoring characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period</li> <li>*New utility construction</li> <li>*Other development activities</li> </ul>

### *Climbing*

Until the Forest Service develops and implements a clear and consistent national policy for safe fixed bolt and hardware maintenance in designated Wilderness areas, climbing areas that are well developed (such as Needles) should not be recommended as Wilderness in order to prevent future management issues associated with fixed anchor maintenance (power drills are not allowed in Wilderness).

Fixed anchors, defined by the Access Fund and the USDA Forest Service,<sup>32</sup> as climbing equipment (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on

<sup>32</sup> Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness, at: <http://www.gpo.gov/fdsys/pkg/FR-1999-10-29/pdf/99-28219.pdf>

technical ascents where removable anchor placements are not possible or for descents (rappels) that would be otherwise impossible without a fixed anchor. The vast majority of climbers have never placed a fixed anchor, opting instead to climb established routes, thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor.<sup>33</sup>

Fixed anchors, specifically bolts, necessitate long-term maintenance.<sup>34</sup> Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are untrustworthy and need replacement much more frequently.<sup>35</sup> Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts.<sup>36</sup> Motorized drills are specifically prohibited in designated Wilderness and often (but not necessarily) prohibited in recommended Wilderness areas. Longstanding and developed climbing resources (such as many of the climbing areas that are located in the Sequoia and Sierra National Forests Wilderness inventory) depend on long term stewardship in order to maintain the established climbing routes and descents.

Well developed, existing climbing areas are “substantially noticeable”<sup>37</sup> and should thereby be excluded from Wilderness recommendations in order to prevent undesirable future management issues. The Forest Service Land Management Planning Handbook clearly states that “[a]s a general rule, developed sites should not be included [as Wilderness].”<sup>38</sup> The following climbing areas are well-established and some were developed as early as the mid-1960s. These “developed sites” are “substantially noticeable,” and should not be included in recommended Wilderness in order to effectively maintain the exceptional climbing opportunities of today into the future: the entire Needles climbing area, Dome Rock, Kernville Rock, Church Domes and the Rectory, Kern Canyon Dome, Trapper Dome, and the Shuteye Ridge areas including Slasher Dome, 5.7 Dome, Big Sleep, Chiquito Dome, Crocodile Dome, Dreamscape, Eagles Nest, Gray Eagle, High Eagle, Midway Dome, Red Eagle, and Shangri La. Access Fund has provided the USFS with descriptions and GPS coordinates for the aforementioned climbing resources, and these are also included within Outdoor Alliance’s updated recreation inventory submitted with these comments.<sup>39</sup>

The Sierra and Sequoia Forests should articulate a clear fixed anchor policy to promote climber safety in Wilderness and non-Wilderness areas. Fixed anchors are unobtrusive and typically not visible to forest visitors. Fixed anchors should be permitted across all ROS categories (with appropriate management). Fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors

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<sup>33</sup> Studies indicate that the vast minority of climbers (<20% based on site specific samples) have ever placed a bolt. It is reasonable to assume that an even smaller minority of climbers have placed a bolt (hand drilled) in a remote wilderness setting based on documented climber use-patterns:

Schuster, R. M., Thomson, J. G., & Hammitt, W. E. (2001). Rock Climber's Attitudes Toward Management of Climbing and the Use of Bolts. *Environmental Management*, 28(3), 403-412.

Murdock, E.D. (2010). Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California (Unpublished).

<sup>34</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

<sup>35</sup> Ibid.

<sup>36</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/best-practices-for-bolt-removal>

<sup>37</sup> The Wilderness Act states that wilderness “(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable . . .” (16 U.S.C. 1131c).

<sup>38</sup> Forest Service Handbook 1909.12 – Land Management Planning Handbook, Section 71.22b, number 7.

<sup>39</sup> OutdoorAlliance\_ProposedRDEIS\_RecData\_20190925.zip

as necessary. For more information on fixed anchor technology and best practices, visit Access Fund's best practices resource page.<sup>40</sup>

We recommend the following language be included specific to fixed anchor management in Wilderness:

**RECREATIONAL CLIMBING**—Nothing in this plan prohibits recreational rock climbing activities in the Wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this Act—

- (1) in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and
- (2) subject to any terms and conditions determined to be necessary by the Secretary.

Access Fund and The Wilderness Society have crafted this guidance language together to assist in future management of fixed anchors in Wilderness.

#### *Mountain Biking: Backcountry Management Area (BMA) - Trail Development*

According to the 2019 Congressional Research Service Report on National Forest System Management, the USFS reports that outdoor recreation is the “single greatest use of the national forests.” This use is not spread out equally. Generally, frontcountry landscapes see greater concentration of use due to ease of access and proximity to densely populated communities. While backcountry areas are farther away from populated communities and harder to access, which keeps visitation levels down. While the intensity of management in frontcountry areas will differ from backcountry areas, they both require active versus passive management. Active management of backcountry areas is less noticeable than frontcountry areas, where parking, signage, restrooms, camping infrastructure and trail work are prominent to provide for and sustainably handle the visitation numbers. Active backcountry management should focus more on purposeful management of the character to maintain the feel and setting that a low-level use area offers.

As incorporated into our amended geodataset for Alternative E RWA and BMA boundaries, we strongly encourage the Forest Service to evaluate and consider BMA designation for the following areas and trails otherwise recommended for Wilderness in Alternatives B and C:

- Shuteye Ridge: not only adjacent to Shuteye trail but also encompassing the existing trail network to the south and west (inside the loop).
- The French Trail (Ansel Adams Wilderness San Joaquin Addition)
- Dinkey Lakes Wilderness Bear Mountain Addition
- Dinkey Lakes Wilderness Addition 1, allowing mountain bike trail connectivity between Kaiser Peak and Red Mountain via Badger Flats. Existing trails should be considered to allow access to mountain bikes.
- Other BMA near Bass Lake overlap with Willow Creek and Central Camp trail
- Slate Mountain: To protect existing mountain biking in this area — Summit Trail, Bear Creek, Nelson Trail — we support BMA designation, as long as the appropriate changes are made to BMA definition to allow for development, improvement and maintenance of mountain biking trails.

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<sup>40</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors>.

- Stormy Canyon/Cannell Peak: To protect existing mountain biking in this area — Whisky Flat, Tobias Creek, Cannell Meadow, Sherman Pass, Kern River Trail, Cedar Canyon (near boundary), Portuguese Pass (near boundary) — we support BMA designation, as long as the appropriate changes are made to BMA definition to allow for development, improvement and maintenance of mountain biking trails.

Backcountry Management Areas (BMAs) are designations that highlight and provide recreational trail access to low development areas, while protecting the key resource and ecosystem values that make them special. BMAs include cherished recreational resources and values, including roadless qualities, wildlife habitat, clean water, open space, and opportunities for rugged backcountry recreation. These backcountry areas are highly valued for the remote human-powered recreational experiences and settings they provide, including non-motorized mountain biking. Therefore, these areas deserve an experiential (benefits and outcomes) based approach through flexible customized management to ensure the long term maintenance of that character and setting. Thoughtful and purposeful management of BMAs should not only maintain but also seek to enhance the quality of access and low level of development of the area. These lands should also be managed in a way that affords permanent protection to their resources and values while enhancing recreational uses.

Trail planning in a backcountry area focuses more on quality versus quantity and escape and challenge versus features and play. To determine the desired future conditions for BMAs, the Forest Service must first seek to establish a baseline of current conditions, access points, trail networks, and gaps. Most trails will have developed organically; they were routed in a way that efficiently provided access between an origin and a destination. Frequently they follow old roadbeds, primitive routes, game trails, or are social trails created over time and through repetitive use. Even trails that have been meticulously planned and designed often rely more on sustainable trail alignment principles than on providing specific experiences. Ideally new trail development achieves both.

Trail planning in BMAs should focus on the following elements, and plan components (Desired Conditions, Objectives, Standards, Guidelines) should be developed and incorporated accordingly:

- Enhancing connectivity.
- Avoiding sensitive resources.
- Developing diverse quality recreational opportunities for the economic benefit of local communities and enjoyment of the public.
- Provide environmentally responsible, well-managed recreational opportunities within the BMA.
- Improve access to and from the BMA.
- Expand specific trail opportunities for mountain biking.
- Provide for routine maintenance, allow opportunities for trail re-route/re-alignment to improve trail sustainability and experience.
- Conduct long-term trail planning to determine the need for and proper placement of new trail opportunities to meet increasing demand.
- Preserve access to existing human-powered trails while expanding trail mileage and connectivity through new route creation to improve use of existing resources and provide new opportunities.
- The USFS should conduct a trails analysis and study to improve recreation trail opportunities (including mountain bicycling)

- The USFS should promote and develop recreational opportunities in the BMA and coordinate with local communities and other jurisdictional land management agencies to seek trail connectivity to maximize public value and economic benefit.

Final Draft Plans should specify BMA Desired Conditions:

- Non-motorized recreation, including mountain biking, is promoted, allowed, and welcomed in all BMAs.
- Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
- The landscape in general is natural in appearance and often includes historic or cultural features.
- Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.
- Recreation settings retain their natural character as development and populations in the region continue to grow and new forms of recreation emerge.
- Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted to avoid, minimize, and/or mitigate those impacts, consistent with management direction for BMAs.

## Conclusion

Overall, the draft plans are off to a good start, and with the addition of elements proposed in these comments, the Sierra and Sequoia revised forest plans would serve as excellent examples for other forests to follow in future forest plan revisions. Outdoor Alliance strongly supports the 2012 Planning Rule and we are heavily invested in its success on the ground. We have invested, and will continue to invest, significant energy into ensuring that the Sierra and Sequoia revised plans successfully integrate sustainable recreation management, promote partnership opportunities, and protect and conserve forest resources. These forests contain world-class recreational resources, unique and important natural features, and are a destination for millions of visitors each year. Much is at stake in these revised plans and we want to help ensure that plans are robust, sustainable, and able to adapt to whatever changes the next 20 years may bring.

We appreciate the opportunity to provide comments and we look forward to continuing this conversation.

Sincerely,



Louis Geltman  
Policy Director, Outdoor Alliance



Katie Goodwin  
California Regional Director, Access Fund



A handwritten signature in black ink, appearing to read "David Page".

David Page  
Policy Chair, Outdoor Alliance California  
Advocacy Director, Winter Wildlands Alliance

A handwritten signature in black ink, appearing to read "Theresa Simsiman".

Theresa Simsiman  
California Stewardship Director, American Whitewater

A handwritten signature in black ink, appearing to read "Todd Keller".

Todd Keller  
Director of Government Affairs, International Mountain Biking Association

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