Data Submitted (UTC 11): 8/12/2022 7:00:00 AM
First name: David
Last name: Page
Organization: Outdoor Alliance California
Title: Senior Policy Advisor
Comments: Dear Deputy Regional Forester Berger,

Thank you for the opportunity to submit objections to portions of the Draft Records of Decision, Final Environmental Impact Statement, and pre-objection Forest Plans for the Sierra and Sequoia National Forests as noticed on June 10, 2022, along with suggested remedies. They are attached here as a pdf document. Please confirm receipt. We look forward to discussing these objections and remedies with you at a mutually convenient time. -dp

August 12, 2022

Objection Reviewing Officer, Deputy Regional Forester Elizabeth Berger USDA Forest Service Pacific Southwest Region

1323 Club Drive

Vallejo, CA 94592

Submitted via email at objections-pacificsouthwest-regional-office@usda.gov

Re: Sierra and Sequoia National Forests Plan Revision Objection Dear Deputy Regional Forester Berger,

Outdoor Alliance is objecting to portions of the Draft Records of Decision, Final Environmental Impact Statement, and Pre-objection Forest Plans for the Sierra and Sequoia National Forests that were noticed on June 10, 2022. Dean Gould, Forest Supervisor, is the responsible official for the Sierra National Forest plan revision.

Theresa Benson, Forest Supervisor, is the responsible official for the Sequoia National Forest plan revision.

Outdoor Alliance filed timely comments on the Proposed Action, Draft Environmental Impact Statement, and Revised Draft Environmental Impact Statement for these Forest Plan revisions on September 29, 2014, August 24, 2016, and September 26, 2019, respectively.

Pursuant to 36 C.F.R. [sect] 219.54 (c)(3) David Page of Winter Wildlands Alliance is designated as the lead objector. If David is unable to perform his duties as lead objector, Theresa Lorejo-Simsiman, of American Whitewater, will act as lead objector.

We appreciate the enormous task of creating the revised Sierra and Sequoia Forest Plans (herein "plans") and we can see that the Forest Service has integrated public input to improve many elements of the plans since the last comment period. However, we object to the Revised Land Management Plans based on the 2012 Planning Rule's requirement to "provide for integrated, sustainable multiple uses" (36 CFR [sect] 219.8, 219.10). We believe there are opportunities to integrate sustainable recreation into other aspects of forest management and that this should be improved before the plans are finalized. Below, we offer objections and remedies to help improve the final plans.

I. Sustainable Recreation

1.
1. The plans fail to adequately integrate sustainable recreation management intoother categories of management actions.

A primary focus of our comments throughout this forest plan revision process was the integration of recreation management actions with other forest management actions. As we explained on the first page of our 2019 comments, as well as in our 2016 comments, to meet the requirements of the 2012 Planning Rule, revised forest plans must include specific plan components that address and integrate sustainable recreation throughout the plan. While the plans do strive to align recreation management actions with the (summer) recreation opportunity spectrum (ROS), and we appreciate that sustainable recreation was among the revision topics, there is no clear integration between sustainable recreation management actions and management actions for other multiple uses [mdash] such as fuels reduction projects or grazing. On page 9, 14, and 25 of our 2019 comments, we suggested specific plan components that would achieve this purpose, yet these suggestions were not incorporated into any of the alternatives in the Final Environmental Impact Statement (FEIS). We are disappointed to see that these plans remain quite siloed, despite our focused engagement on this topic through this planning process. We've included these plan components in our suggested remedy for this objection, below.

Page 569 (Volume 2) of the FEIS states that the recreation opportunity spectrum integrates other resource values, such as areas with wildlife concerns or areas that are at risk of high-severity fire, into recreation management. However, neither the FEIS nor the plans provide details on how the ROS achieves this, so it is not possible to evaluate the effectiveness of this integration. Furthermore, because the ROS maps do not address winter settings or integrate winter-specific resource values, at best, the maps only apply for part of the year. Finally, with regard to providing direction for how forest managers should use the ROS or how the ROS should influence management actions, the plans fail to go beyond the ROS map and provide scant details about the ROS in the FEIS and plans' glossary.

The FEIS should explain how management direction across each forest, for each use, fits within the ROS setting

for any particular area. In addition, the final plans should include plan components based on the ROS to elaborate on the different settings, characteristics, and suitability for each ROS category. For example, the Custer Gallatin's 2020 Forest Plan includes Desired Conditions, a Standard, and a Guideline to guide implementation and use of the ROS, along with Objectives, Standards,

Guidelines, and Suitability plan components for each ROS setting.1 The Sierra and Sequoia should do the same in order to effectively use this important tool. In addition to these necessary ROS-specific plan components, the plans should also include components that will help the Sierra and Sequoia National Forests (herein forests) achieve the desired conditions or other plan direction associated with each ROS setting. These plan components are necessary if ROS is to be a meaningful management tool for integrating sustainable recreation with other resource values.

Remedies

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* Convert the tables on page 789 and 790 of the FEIS (also found on pages 202 and 203 of the Sequoia Forest Plan and pages 198 and199 of the Sierra Forest Plan) into plan components following the example set by the Custer Gallatin and other recently revised forest plans, and as described in our 2019 comments. For example, for Primitive ROS settings, include the following plan components:

* REC-FW-DC: Primitive ROS settings encompass vast, remote, naturally evolving, and predominantly unmodified landscapes. Primitive settings often provide secure wildlife habitat, naturally appearing vegetation, clean water, may contain the unit's most intact ecosystems and often coincide with designated wilderness. Primitive recreation opportunity spectrum settings contain no motorized recreation. They provide quiet solitude away from roads and people, are generally free of human development, and facilitate self-reliance and discovery. Signing and other infrastructure are minimal and constructed of rustic, native materials.
* REC-FW-STD: Primitive settings are located 3 miles or more from designated motorized routes and areas, and encompassing at least 5,000 acres.
* REC-FW-SUITABILITY: Primitive settings are suitable for non-motorized, class 1 trails, and travel on foot and horse.
* REC-FW-SUITABILITY: Primitive settings are not suitable for motorized travel.
* REC-FW-SUITABILITY: Primitive settings are not suitable for mechanized travel within designated Wilderness.
* REC-FW-SUITABILITY: Primitive settings are not suitable for vegetation treatments, except for fire use.

* Include the following plan components [mdash] which we previously suggested in our 2019 comments [mdash] to integrate sustainable recreation with other resource values:

1 See Custer Gallatin 2020 Forest Plan, pages 90-95: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd762990.pdf

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* REC-FW-DC: 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.
* REC-FW-STD: Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.
* REC-FW-STD: 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. 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.
* REC-FW-GDL: 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.
* REC-FW-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.
* TERR-FW-GDL: 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.
* TERR-CES-GDL: Post-disturbance restoration projects should be designed to optimize and enhance appropriate recreation opportunities and trail system infrastructure.
* 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.

1. Trail maintenance objectives in each plan are too low

On page 7 of our 2019 Revised Draft Environmental Impact Statement (RDEIS) comments we suggested a sustainable recreation objective for the forests to maintain 80% of the forests' designated trail systems to standard within 15 years of plan approval. Our comments also included suggested Guidelines and Potential Management Approaches for achieving this Objective. In response, the FEIS explains that, given the amount of roads and trails on the Sierra and Sequoia, the agency's anticipated budget, and available staffing resources, an objective that seeks to maintain to standard over 30 percent of the forests' designated trail systems is not feasible.

We are disappointed that the Forest Service ignored our suggestions for achieving a more ambitious objective. While we appreciate that the draft plans include REC-FW- OBJ 01, which calls for maintaining the trail system to standard we object to the 25% level at which this objective is set ("Within 15 years of plan approval, maintain to standard 25 percent of the [Sierra/Sequoia] National Forest's designated trail systems.").

By setting an objective of only maintaining 25% of the designated trail system to standard within the next 15 years, the forests are communicating an acceptance of not maintaining the vast majority of their trail systems. This is unacceptable for the public who use and highly value Forest Service system trails. If 75% of the trail system is not maintained to standard there will be significant repercussions for public access to these National Forests, and significant environmental effects stemming from people creating their own routes to access the forests or navigate sections of trail that are in disrepair.

We are well aware that the Forest Service suffers from a lack of capacity, especially in its recreation programs, but thanks to the Great American Outdoors Act and other infrastructure-related legislation, the Forest Service has new funding opportunities to address trail maintenance. Furthermore, the Sierra and Sequoia are fortunate to have many partner organizations who are willing to offer their time, expertise, and resources for trail maintenance. Finally, as part of the new Shared Stewardship Agreement between the United States Forest Service and the State of California, signed in 2020, both parties have committed to "leverage resources and extend capacity through partnerships and alignment" to "improve access to sustainable recreation." It is hard to imagine a better, more cost-effective way to do this than to maintain to standard a significant percentage of the designated trail system on each of the national forest units. The final forest plans should strive for a future of better management. Trail maintenance is among the most visible and [mdash] to the general public [mdash] important aspects of managing

the national forest and should be treated as such in the forest plans. While 80%, as we suggested in our earlier comments, may not be feasible, we believe that with new funding opportunities and help from experienced partner organizations, the forests should be able to reach an objective of maintaining at least 50% of the designated trail system to standard within 15 years.

Remedies

* Revise REC-FW-OBJ 01 in each plan to read Within 15 years of plan approval, maintain to standard 50 percent of the [Sierra/Sequoia] National Forest's designated trail systems.
* Add the following plan component to the final plans:

* Potential Management Approach: Collaborate with local user groups and volunteers to maintain the designated trail system to standard.

1.

1. The plans fail to include a Winter Recreation Opportunity Spectrum

We are disappointed that the plans fail to include a winter ROS or provide direction for recreation settings in winter. This is something that we have strongly advocated for throughout the forest planning process. We raised this issue in our 2019 RDEIS comments, pages 2, 16, and 24; 2016 Draft Environmental Impact Statement (DEIS)

comments, pages 7, 9,10, and 17; and 2014 scoping comments, page 2.

The Recreation Opportunity Spectrum [mdash] winter or summer [mdash] is the heart of any sustainable recreation framework. It describes the desired collage of settings (physical, social and managerial) where specific experiences and benefits are derived. Given the differences in use, access, and setting on the Sierra and Sequoia National Forests during winter versus summer, the final plans should include separate recreation opportunity spectrum classifications for summer and winter. This is critical for guiding forest management actions and site-specific decisions in winter, when Forest Service actions, and public expectations, for any given area may be considerably different than they are in summer. While the FEIS is correct in stating that the 2012 Planning Rule does not require development of a winter ROS, it neglects to mention that the forests that support winter recreation are strongly encouraged to develop and include winter ROS maps in revised forest plans.

Both the Sierra and Sequoia National Forests receive sufficient snow to support winter recreation and both plans specifically include snowsports in their enumerations of the various recreation opportunities on the forest. In addition, the Sierra Forest Plan describes how the Sierra Heritage Scenic Byway includes many snow parks for accessing the forest in winter. However, the plans do not mention that winter travel planning to designate routes and areas for over-snow vehicle (OSV) use in compliance with subpart C of the Travel Management Rule is required for both forests.2 While Volume 2, page 571, of the FEIS states that designation of roads and trails open to motorized vehicles is accomplished through site-specific, project-level planning following the Travel Management Rule (36 CFR 212, 251, 261, and 295), the FEIS does not mention that travel management planning is also required to designate areas for cross-country over-snow vehicle use. Despite the fact that this use currently occurs on both forests, without a winter ROS, it is not clear that the reference to 36 CFR 212 applies to Subpart C as well as Subparts A and B. Not only would a winter ROS determine where it is suitable to designate routes for over-snow vehicle use, it would guide designation of areas for cross-country over-snow vehicle travel.

The forest plans should include winter ROS as part of a framework for sustainable winter recreation and subsequent implementation-level winter travel management planning.3 This framework is necessary to satisfy the 2012 planning rule requirement to develop plan components that provide for year-round sustainable recreation4 and to ensure that OSV use does not threaten sensitive winter wildlife, wildlife habitat, air and water quality, and wilderness values.5 Both the Sierra and Sequoia have the benefit of revising their land management plans prior to embarking on winter travel planning. A thoughtful, forward-looking, winter ROS map will define the contours of future winter travel planning and make this process much more straightforward. Without a winter ROS map and plan language that describes the unique nature of ROS settings in winter, the Sierra and Sequoia

will have little to guide them through winter travel planning, making the process unnecessarily complicated and contentious.

Already we are seeing the pitfalls of not having winter ROS to guide OSV planning on the Inyo National Forest. The Inyo has moved to initiate winter travel planning following completion of its forest plan revision, which we appreciate, but, as anticipated, the revised forest plan's ROS map fails to provide guidance for this process, as it is not intended to reflect ROS settings in winter and does not address winter recreation settings or opportunities in any way. As with the Sierra and Sequoia, recreation opportunities and settings are vastly different on the Inyo in winter versus summer, and

2 Winter travel planning is required under 36 C.F.R. part 212.

3 See Forest Service Manual (FSM) 7712.2 & Forest Service Handbook (FSH) 7709.55, [sect] 11.2.

4 36 C.F.R. [sect] 219.10(b)(1)(i).

5 See 36 C.F.R. [sect][sect] 219.8, 219.9, 219.10(b)(1)(iv) (forest plans required to provide for ecological sustainability and species diversity, and to protect the ecological and social characteristics of recommended wilderness areas).

many areas that are non-motorized in summer on the Inyo provide highly-valued backcountry OSV riding opportunities in the winter. Moreover, there are areas across the Inyo, Sierra, and Sequoia that are roaded and suitable for motorized access in the summer, which provide highly-valued ski or snowshoe opportunities in the winter, or are critical wildlife habitat where winter motorized use is not suitable. Without a winter ROS, the Inyo is forced to choose between ignoring forest plan direction or developing a winter travel plan that will severely limit longstanding backcountry OSV recreation opportunities. Either option poses significant difficulties for public engagement. There is no need for the Sierra and Sequoia to follow the same flawed approach.

Conversely, the Shoshone National Forest, which is currently conducting travel management planning, has been able to reference its 2015 Forest Plan for guidance. The Shoshone Forest Plan includes a winter ROS map that identifies big game winter range and other sensitive areas as primitive or semi-primitive non-motorized in winter. These areas are not under consideration in the winter travel planning process.

Meanwhile, the Forest Service has been able to clearly communicate that areas zoned for winter semi-primitive motorized use are not suitable for highly developed winter recreation infrastructure, while groomed trails and staging areas are suitable within winter roaded natural areas. Other new forest plans, recently revised under the 2012 Rule, including the Flathead, Custer Gallatin, and Helena-Lewis & Clark, contain winter ROS maps and plan components as well. These plans provide a template for the Sierra and Sequoia to follow in creating winter ROS maps and plan components.

It is critical that the forest plans use the ROS to identify the suitability of various forest lands for winter motorized use. This is markedly different from designating areas (or routes) for motorized use, which will happen subsequently in winter travel planning. The draft plans are correct in stating that travel management designations must occur in a subsequent site-specific process. However, describing and mapping suitability is an essential foundation for these future site-specific decisions. Connecting suitability with the ROS maps indicates that motorized use may be appropriate but does not make a specific commitment to authorize the use. Furthermore, where lands are identified as not suitable for motorized use, then it may not be authorized in subsequent travel planning.

Although forthcoming winter travel planning will make site-specific designations, the Sierra and Sequoia should make broad suitability decisions during forest planning that reflect an integrated planning process in which recreation is part and parcel of social, economic, and ecological sustainability. Winter ROS maps should not simply reflect where OSV use currently occurs on the forests, but rather should be forward looking

and provide guidance on how the forests hope to manage winter recreation in the future.

Remedies

* Clearly articulate and map a winter ROS that describes the suitability of various lands on the forest for over-snow vehicles, as well as suitable types and level of winter infrastructure development across all settings.
* Develop winter ROS maps and provide opportunity for public review and comment on maps before incorporating them into the final forest plans.

1.
1. The final forest plans should include a specific timeframe for when winter travelmanagement planning will occur.

On page 24 of our DEIS comments we asked the Forest Service to set an objective for completing winter travel planning within 3 years. However, there is no such timeline in the plans. There is, however, precedent in the plans for setting timelines for future projects. For example, on page 83 of the Sequoia Forest Plan and page 85 of the Sierra Forest Plan, the Forest Service lists several objectives, with time frames, for sustainable recreation. The final plans should also include an objective for when Subpart C travel planning will begin. Alternatively, the Forest Supervisors could commit to a timeline for Subpart C implementation in the Records of Decision (RODs).

Remedy

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* The Forest Service should commit to beginning site-specific winter travel management planning within 1 year of the completion of the Forest Plan revision with a goal of completing this process within 3 years. This commitment should be clearly articulated in the final Sequoia Forest Plan as REC-FW-OBJ 04 and final Sierra Forest Plan as REC-FW-OBJ 03: Within 1 year of plan approval, initiate winter travel planning under Subpart C of the travel management rule.

1. The Sustainable Recreation Management Areas and lack of RecommendedWilderness and other roadless area protections in the draft plans fail to protect highlyvalued wildlands and outdoor recreation values.

We are deeply disappointed that the Forest Service disregarded the extensive collaboration that occurred between recreation and conservation stakeholders to develop strong protections for roadless areas through the Backcountry Management Areas (BMA) and Wilderness recommendations (RWA) presented in Alternative E. The forests instead chose to designate a spectrum of sustainable recreation management areas and essentially no recommended wilderness (Alternative B-modified). Throughout the plan revision process, the human-powered outdoor recreation community has consistently advocated that the revised plans take an integrated approach to sustainable recreation management that includes durable protections for roadless areas identified during the wilderness inventory and evaluation process, and our concerns have been echoed by thousands of public comments. To adopt Alternative B-modified with regard to sustainable recreation, roadless area conservation, and recommended wilderness is a missed opportunity to protect highly valued roadless lands on these forests for the irreplaceable recreation and conservation values that they provide.

We specifically discussed inventoried roadless area management on page 26 of our 2019 RDEIS comments and we appreciate that there are plan components related to Inventoried Roadless Areas ("roadless areas") in both plans. Protecting roadless areas is paramount for mitigating climate impacts, bolstering resiliency and protecting water quality, habitat for flora and fauna, and outdoor recreation experiences. The language in the plans is a good starting point, but we would like to see the Sierra and Sequoia further elaborate on roadless area direction, per the suggestions we provided in 2019.

Over the past several years we have seen, nationally, several political challenges and threats to the Roadless Rule and there is no guarantee that the Rule will remain in place for the lifetime of these pans. Therefore, simply referencing the Roadless Rule, as the plans do, is not enough. Instead, the final plans must ensure that these areas are protected from logging and road building regardless of what may happen to the Roadless Rule in the future. The Sierra and Sequoia can ensure that roadless lands and roadless characteristics remain protected with designations that specifically prohibit logging and road building [mdash] specifically by designating the BMAs and RWAs described in Alternative E. In addition, the plans should incorporate a desired condition that addresses scenic integrity objectives for roadless areas, much as the plans have specific direction for National Recreation Trails (ex: DA-NRT-DC 03). This would be especially helpful as Volume 6 of the FEIS does not include a map that shows the overlap of scenic integrity objectives with roadless areas, thereby making it unclear what the scenic integrity objectives within roadless areas are.

The RWAs and BMAs in Alternative E represent the efforts of a thoughtful collaborative approach between

recreation groups and conservation organizations. These designated areas were developed and mapped to garner support from a diverse suite of interests, protect critical ecosystem values, and provide for a multitude of recreation opportunities which, in turn, support communities across both Forests. In 2019, we worked with climbers and local mountain bikers to improve geospatial datasets on existing non- motorized recreation infrastructure, assets, and opportunities on these forests, and collaborated with stakeholders in the broader conservation community to find compromise between our shared interests to protect and preserve wilderness and roadless characteristics, solitude, natural soundscapes, and the highest levels of scenic and ecological integrity where appropriate on these forests, while still allowing for non- motorized recreational access and opportunities. We described these efforts and our resulting recommendations in great detail on pages 26-29 of our 2019 RDEIS comments. These efforts are reflected in the BMAs and RWAs in Alternative E.

The wilderness recommendations in Alternative E reflect a thoughtful approach to conservation that provides the highest level of administrative protection available to lands where it is appropriate without unnecessarily impacting appropriate recreation opportunities and management. These polygons were drawn to avoid conflict with non- conforming uses and do not include routes or areas currently open to those uses. The Backcountry Management Areas described in Alternative E, meanwhile, are an appropriate way to protect roadless areas not recommended for wilderness from road building and logging. Protection of these wildlands on the Sierra and Sequoia has a long history. The 1991 Sierra Forest Plan discouraged road building and logging in portions of the Devil Gulch-Ferguson Ridge, Mt. Raymond, and Dinkey Lakes Addition by zoning them for non-regulated timber management. Meanwhile, the 1990 Mediated Settlement Agreement allocated portions of several roadless areas on the Sequoia Forest to unregulated management to discourage road building and logging. Following this, issuance of the 2001 Roadless Area Conservation Rule (Roadless Rule) protected (and continues to protect) inventoried roadless areas from road building and commercial logging. Unfortunately, only inventoried roadless areas identified in the 1979 RARE II process are protected under the Roadless Rule, which leaves out other roadless lands that the Sierra and Sequoia identified in this forest planning process. True and full protection of roadless wildlands on the Sierra and Sequoia can best be achieved by designating the BMAs and RWAs described in Alternative E.

Collectively, BMAs and RWAs are critical to, among other things, protecting clean water, ensuring climate resiliency for many species that live in the forests, and providing highly valued backcountry recreation opportunities for many user groups. In contrast, the preferred alternative fails to protect important roadless areas, wildlands, and backcountry recreation settings and experiences across the Sierra and Sequoia National Forests. Furthermore, the forest plans fall short of meeting the challenges of sustainable recreation management and landscape-scale conservation over the lifetime of these plans.

Thousands of public comments supported designation of additional RWAs and designation of BMAs on these forests throughout the forest plan revision process, yet the Forest Service has failed to give a plausible explanation for why it selected Alternative B modified in this regard. On page 27 of the Sequoia ROD and page 23 of the Sierra ROD, Forest Supervisors Benson and Gould claim that Recommended Wilderness designations create conflict with recreation uses, but the maps that we submitted in 2019 and the BMAs and RWAs included in Alternative E were specifically drawn to avoid conflict between Wilderness protections and recreation uses that are incompatible with Wilderness. We are not opposed to considering and designating destination recreation areas for heavily-used areas that meet the criteria established in the new plans, but the way in which the plans proposed to manage recreation and meet conservation goals in the more remote areas of the forest falls short.

Remedies

* Designate Backcountry Management Areas and Recommended Wilderness Areas as mapped and described in Alternative E.
* Include the following plan component as part of the direction for Inventoried Roadless Areas in the final Plans:

* DA-IRA-DC: Management activities conducted within Inventoried Roadless Areas should be consistent with the scenic integrity objective of High or Very High.

1.
1. Wild and Scenic Rivers

In 2019 we provided RDEIS comments on whitewater recreation and the Wild and Scenic Rivers study process with a primary goal of increasing the river miles found eligible for an outstandingly remarkable value of whitewater recreation. We are pleased to see the combined eligible river miles identified specifically for a whitewater ORV in the Sequoia and Sierra Forest Plans, which is a notable improvement, increasing from 56 to 114 miles. However, we provide the following objections and comments regarding Wild & Scenic River Eligibility.

2a. The revised plans erred in excluding certain rivers with whitewater ORVsfrom Wild & Scenic Eligibility

We would like to record our objection to the whitewater rivers found ineligible in the FEIS (See table below). The FEIS rationale that excluded these rivers cited the absence of these rivers from a "variety of whitewater boating websites" or that they did not "have the potential to attract visitors". Additionally, the evaluation team felt some of the unique river features exist elsewhere within the region of comparison. However, we feel rivers overall should be evaluated on actual physical attributes as opposed to their popularity on the internet. We dispute the conclusion that these rivers would not attract visitors from throughout or beyond the region. And again, we ask the Forest Service to specifically detail the location of unique features of ineligible rivers that exist elsewhere.

Table 1

RiverGISWWB Miles
Bear Creek3.115.6
Big Creek3.20.23
Mono Creek3.166.45.8
Piute Creek3.199.29
Piute Creek3.199.30.6

San Joaquin3.233.310.4

Remedy

* Designate the following rivers sections [mdash] detailed in Table 1 [mdash]as Wild & Scenic Eligible: Bear Creek, Big Creek, Mono Creek, Piute Creek (2 reaches), and San Joaquin.

or

* Detail within the FEIS the specific location of unique features (including whitewater boating ORVs) of ineligible rivers that exist elsewhere.

2b. The revised plans fail to include a whitewater boating ORV forcertain Wild & Scenic Eligible rivers

The following are whitewater reaches that have been identified as eligible Wild and Scenic rivers but were not deemed to have an ORV for whitewater boating. We object to the exclusion of whitewater ORVs and would like them reevaluated. The table identifying the South Fork and the Middle Fork San Joaquin River in the FEIS does not include detailed ORV rationale and it is unknown whether whitewater recreation is included in the ORV. The 32.5 miles of the Middle Fork San Joaquin complete the river mileage of Devil's Postpile, an iconic multi-day whitewater adventure which begins in the Inyo National Forest. Whitewater boating on the South Fork of the Middle Fork Tule and Mono Creek should not be excluded for eligibility because of their lack of internet popularity.

Table 2

RiverGISWWB Miles
South Fork of the Middle Fork Tule2.1384.8
Middle Fork San JoaquinSegment 432.5
Mono Creek3.166.26.7
South Fork San Joaquin RiverSegments 2,3,47.6

Remedy

* Include a whitewater ORV for the following Wild and Scenic eligible rivers as detailed in Table 2: South Fork of the Middle Fork Tule, Middle Fork San Joaquin, Mono Creek, and South Fork San Joaquin River.

2c. The Plans fail to include whitewater eligible rivers with other ORVs

On September 18, 2013, American Whitewater, an Outdoor Alliance member group, provided comments during the assessment phase of the forest planning process that asked for the consideration of spectacular and remote paddling adventures as well as other values that are extremely rare in the lower 48 states of the U.S. (page 3). We therefore ask for the reevaluation of specific reach ORVs we feel should be included in the FEIS as listed in Table 3 below:

Table 3

RiverGISWWB MilesOther ORV
Dinkey Creek3.68.44Scenery
Dinkey Creek3.68.66.4Scenery
San Joaquin3.233.11Pre-History
San Joaquin3.233.310.4Pre-History
San Joaquin3.233.48.3Pre-History
San Joaquin3.233.67Pre-History

This section of Dinkey Creek features outstandingly remarkable values of scenery which meet the criteria of "segments with granite basins, slides, waterfalls, and drops creating unique or exemplary visual features or attractions". This section of Dinkey Creek is known worldwide for the waterfalls and is considered among the top 5 whitewater waterfall resources. On the San Joaquin, the North Fork Mono Tribe has mapped the historic North Fork Mono Trail for inclusion in cultural properties management plans needed for the hydroelectric projects owned by Southern California Edison and Pacific Gas & Electric. The North Fork Mono Tribe has cataloged and dated cultural sites along the San Joaquin as far back as 8,000 years, therefore this section of river should be reevaluated for a prehistory ORV.

Remedy

1.
1. Reevaluate the specific reaches of Dinkey Creek and the San Joaquin River detailed in Table 3 for Wild & Scenic River eligibility based on whitewater boating, scenic, and prehistory ORVs.

Sequoia Forest Plan Pacific Crest Trail Management Area Standards should notinclude a broad "case by case" exemption.

We appreciate the detailed direction both forest plans contain for the Pacific Crest Trail Management Area (MA-PCT and MA-PACTW). Overall, we are strongly supportive of the Pacific Crest Trail Management Area plan components in the forest plans. However, we object to the exemption included in MA-PCT-STD 03, 04, and 05 in the Sequoia Forest Plan that states: "...or if approved on a case-by-case basis for management of the trail[hellip]" This exemption is vague and could create unintended consequences for management of the PCT, depending on how it is interpreted by future land managers.

The "administrative" purposes exemption also contained in these plan components should cover any exemptions needed for administration or management of the trail.

Remedies

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* Remove the broad exemption language from the Sequoia Forest Plan for MA- PCT-STD 03, 04, and 05 as follows:

* 03 Motorized travel and bicycle travel on the Pacific Crest National Scenic Trail tread and motorized travel along the trail are prohibited year-round. Exemptions include where the trail crosses or is located on designated motorized routes or if approved on a case-by-case basis for managementof the trail or for administrative or emergency purposes, including search and rescue.
* 04 Motorized travel on designated motorized routes and in designated motorized areas is allowed within the management area. However, motorized travel within the management area that would substantially interfere with the nature and purposes of the Pacific Crest National Scenic Trail is prohibited. Exemptions include where required by law to provide access to private lands, or where it is the only prudent and feasible option for such access. Exemptions also include where the trail crosses or is located on designated motorized routes or if approved on a case-by-casebasis for management of the trail or for administrative or emergency purposes, including search and rescue. Travel management decisions, including decisions about designation/removal, location, design, and management of motorized routes and areas, are made at the project level under the Travel Management Rule (36 CFR 212), and must ensure that motorized travel within the management area does not occur on or along the Pacific Crest National Scenic Trail and does not substantially interfere with the nature and purposes of the Pacific Crest National Scenic Trail. The following actions may be taken, if necessary, to ensure motorized travel does not substantially interfere with the nature and purposes of the Pacific Crest National Scenic Trail:

1. closure of designated motorized routes or areas within the management area;
2. re-route of designated motorized routes within the management area to locations outside the management area, or to other locations within the management area; or
3. removal, blocking, or naturalizing unauthorized routes within the management area.

However, such actions are not automatically mandated for all routes or areas within the management area.

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* 05 Mechanized travel on routes and in areas authorized for such use is allowed within the management area. However, mechanized travel within the management area that would substantially interfere with the nature and purposes of the Pacific Crest National Scenic Trail is prohibited. Exemptions include where required by law to provide access to private lands, or where it is the only prudent and feasible option for such access. Exemptions also include where the trail crosses routes authorized for mechanized travel or if approved on a case-by-case basis formanagement of the trail or for administrative or emergency purposes, including search and rescue.

III. Diversity, Equity, and Inclusion

1.
1. The plans must specifically promote effective communications with minoritygroups.

The RDEIS noted that 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".6 We applaud the Sequoia and Sierra National Forest Plans for including Diversity, Equity and Inclusion components to the forest wide goals.

Specifically, we are pleased that the Forest Service adopted most of the language we suggested on page 10 of our 2019 comments for REC-FW-GOAL 03 and VIPS-FW- GOAL 01 and 06. However, we note and object to the exclusion of the word minorities in the revised language. Since outreach and communication are key starting points for engagement, we ask that these goals specify promoting effective communications with minority groups.

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Remedies

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* Specifically include outreach and communication to minority groups in REC-FW- GOAL 03 and VIPS-FW-GOAL 01 and 06 as follows:

* REC-FW-GOAL 03 Promote effective communication with neighboring communities, urban populations, youth, minorities, and underserved communities 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.
* VIPS-FW-GOAL 01 Work with neighboring communities, urban populations, youth, minorities, underserved communities, organizations, State and local agencies, Tribes, and other Federal agencies to sustain national forest benefits to people across the broader landscape.

* VIPS-FW-GOAL 06 Work with partners and volunteers in the coordinating, developing, and delivering educational and community outreach programs. Work with partners to provide consistent training to those who engage in educational or community outreach programs. Actively engage neighboring communities, urban populations, youth, minorities, and underserved communities in programs.

IV. Energy - Hydropower

1.
1. The plans are inconsistent with the tenets of equal consideration under theFederal Power Act.

The FEIS did not incorporate our request, made on page 11 of our 2019 comments, to include language in desired conditions NRG-FW-DC and goals NRG-FW-GOAL that are consistent with the tenets of "equal consideration" under the Federal Power Act Section 4e. As our DEIS comments outlined, the 4e language specifically includes language for the protection of "recreational opportunities." Currently, the Sequoia and Sierra National Forests are or will engage in over a dozen hydropower projects before the Federal Energy Regulatory Commission that are either in the pre-filing, relicensing or plan implementation phases. Therefore, we ask for the inclusion of recreational opportunities as a consideration for hydropower proceedings in the desired conditions and goals of the Sequoia and Sierra National Forests.

Remedies

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* Include the following plan components to protect recreational opportunities when considering hydropower projects:

* 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.
* NRG-FW-GOAL 04 When new hydroelectric developments are proposed, or relicensing occurs on existing developments, Forest Service personnel will coordinate with project stakeholders, State and other Federal agencies to insure the protection of recreational opportunities.

Finally, we would like to voice our dissatisfaction with how the Forest Service responded to public comments in the FEIS. While we recognize that this is not a concern that qualifies as an objection under 36 CFR 219.4 and 219.16, we believe it is an important point for the Forest Service to consider. Volume 5, Appendix H, of the FEIS provides agency responses to public comments, sorted by "comment groups." The vast majority of these responses are vague or outright dismissive. Members of the public invest substantial time and energy into understanding Forest Service documents and submitting substantive comments throughout the forest plan revision process. While it is our hope that the Forest Service takes these comments to heart and that they truly do inform development of the final forest plan, responses such as "Changes were made to the Forest Plans, EIS, and/or other planning documents in response to these recommendations" do nothing to help the public understand what changes were made. Frustration is further compounded by another common response in Appendix H: "These recommendations are general statements and lack the needed substantive context of how the Forest Plans or EIS should be updated", a response often associated with comments that provide rationale or background on a particular recommendation in the same comment letter. However, the agency's response to comment group 14, regarding the Pacific Crest Trail, demonstrates that the Forest Service is capable of providing a robust response to public comments in a FEIS. We appreciate the detailed response to these comments, but wonder why other comments [mdash] raising equally valid concerns and providing equally substantive suggestions [mdash] were undeserving of a substantive response?

Thank you very much for your consideration of the objections, concerns, and remedies presented in this letter. We would like to meet with the Reviewing Officer at a mutually convenient time to discuss the above concerns. Please inform us in writing of any responses to these objections or of any further opportunities to comment on decisions.

Sincerely,

David Page Lead objector

Senior Policy Advisor, Outdoor Alliance California

Executive Director, Winter Wildlands Alliance (Outdoor Alliance member group)

Theresa L. Lorejo-Simsiman California Stewardship Director

American Whitewater (Outdoor Alliance member group)

Katie Goodwin

California Regional Director

Access Fund (Outdoor Alliance member group)

Steve Messer President

Concerned Off-Road Bicyclists Association (Outdoor Alliance member group)

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California Program Manager Outdoor Alliance