

Data Submitted (UTC 11): 8/14/2022 7:00:00 AM
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Title:
Comments: Please see the attached letter.

Thanks,

Bruce Witcher,

CORVA

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August 14, 2022

Objections to the pre-objection versions of the Final Environmental Impact Statements for Revision the Sequoia and Sierra National Forest Land Management Plans and the Sierra and Sequoia Land Management Plans

Submitted by:

Lead objector, CORVA Director of Land Use and Public Policy

Bruce Witcher

Additional Objectors

Amy Granat

Kevin Bazar

Mike McGarity

Responsible official:

Dean Gould, Forest Supervisor, Sierra National Forest

Theresa Benson, Forest Supervisor, Sequoia National Forest

Dear Planning Team,

CORVA represents approximately 1500 members throughout the State of California and advocates for responsible off-highway vehicle recreation on public lands. We are submitting our objections on behalf of our members and associated clubs.

Our main objection is that the Sequoia and Sierra Forest Plan revisions fail to address the effects of the COVID - 19 pandemic on Forest visitation and management.

This is a new issue arose after opportunities for formal comment closed in 2019. We recognize that the Forest Service has adopted policies and set management direction during the pandemic to help maintain the safety of both employees and the visiting public. For example, the Forest Service maintains a website with updates on COVID-19 policy and has published policy documents and the 2021 COVID-19 Workplace Safety Plan and the USDA Reopening Playbook,[1] However actions taken by government agencies such as the Forest Service to control the spread of the virus and mitigate economic impacts caused short-term disruptions in forest products supply chains. COVID-19 containment measures delayed or postponed forest management and research; a surge in visitation of forests near urban areas increased vandalism, garbage accumulation, and the danger of fire ignitions. Forests and parks in remote rural areas experienced lower use, particularly those favored by international visitors, negatively affecting nearby communities dependent upon tourism. Physical distancing and isolation increased online shopping, remote working, and learning; rather than emerging as novel drivers of change, these actions accelerated existing trends.[2]

Although the effects of the pandemic were readily apparent to Forest visitors and Forest Service staff during 2020-2021, data measuring these effects have only recently become available. National Visitor Use Monitoring data available from FY2018-2020 were adjusted to account for pandemic effects. These data compared results for visitation data in both the first and second half of FY2021 to results for comparable periods in FY2016. Only the first half of FY2021 showed significant differences, but this analysis is based on unproven assumptions. After adjusting for normal growth rates, the remaining increases or decreases in visitation were assumed to represent the effects of the pandemic. The rates of change were applied to forest units not sampled in FY2021, under the assumption that the observed changes happened on all forest units.

The widespread and major effects of the pandemic led to a shift in the NVUM data collection process. Face-to-face interviewing of exiting visitors was suspended in several Forest regions for all FY2021. Individual characteristics from FY2016 were assumed to be reasonably accurate. Responses were reweighted to FY2021 visitation levels and incorporated into the analysis. [3] The validity of this method of analysis remains unknown and is based on unproven assumptions.

Information about the pandemic is conspicuously absent from the pre-objection version of the FEIS and revised Sierra and Sequoia Forest Land Management Plan.

We submit that Sequoia and Sierra National Forests should evaluate the effects of the pandemic on Forest

management, including the supply of Forest products, economic effects on adjacent communities and on visitation. If these effects are significant, it may be necessary for the Forests to publish a supplemental EIS that includes an analysis of pandemic effects and how they should be addressed by the EIS and revised Forest Plan.

We object to the Sustainable Recreational Management areas established in the pre-decisional FEIS and Revised Forest Plan because they do not consider the increase in use that occurred during and following the pandemic.

We previously commented that the sustainable recreation management areas were difficult to understand, and that the maps provided lacked sufficient detail. The Forests subsequently provided an interactive GIS layer map that is a vast improvement.

We contend that recreation zoning should be revisited because of the increased use noted during and after the pandemic, which has augmented our prior concerns related increasing demand for opportunity for motorized recreation on public lands. According to the OHV registrations reported by the California Department of Motor there has been a 40% increase in OHV registrations [4]. E bikes, classified by the Forest Service as motorized vehicles, are highly popular and enjoyed record sales during the pandemic. With the increase in Forest visitation during the pandemic an increasing number Forest visitors are using motorized vehicles on the Forest transportation system. At the same time designation of new wilderness, military base expansion, and Travel Management plans have reduced the amount of opportunity available on public land. Our members have expressed concern that Forest Plan revisions often include changes that can lead to additional restrictions on motorized use on NFS lands at a time when demand is increasing.

The Sierra and Sequoia revised Forest plans acknowledge the importance of maintaining existing designated motorized routes of travel, as well as providing an opportunity for designation of additional routes through the Travel Management process. The revised Forest Plans recognize that recreational needs evolve over time and that Forest Plans need the flexibility to allow management to be responsive to changes in user demographics, yet the document is unclear about how the Forests will accommodate increasing demand for recreational opportunity.

Sustainable Recreation Management Areas

The draft Plans include sections on Sustainable Recreation with areas for Destination Recreation Areas, General Recreation Areas, and Challenging Backcountry Areas. According to the document zoning is based on information provided by Forest Staff, the NVUM as well as geospatial information. Area designations would change in response to changing demographics.

We submit that Sierra and Sequoia National Forests should reevaluate sustainable recreation zoning when data from 2020-2021 NVUM studies become available. The Summary visitation tables 89 and 90 in the draft EIS volume 2, pages 573- 574[5] should be updated to include this new information. Estimates from the most recent available NVUM surveys in 2016-2017 show that Sierra National Forest had 144,807 OHV Visitor Days and Sequoia National Forest had 289,495 OHV visitor days.[6] These figures demonstrate a significant amount of use. The Sequoia National Forest 2022 OHV grant application included comments that OHV use increased significantly during the pandemic in 2020-2021. We submit that the NVUM sampling methodology may undercount motorized visits because it is based on limited visitor sampling that frequently misses motorized trailheads and may not capture visitor numbers on high use weekends.

Sustainable Recreation Management Areas

A goal of the recreation area designation process is to better inform the public as to what they can expect to occur in various parts of the Forest. In this plan revision the reader must search for the Sustainable Recreation management area details, including the Desired Conditions, Goals and Objectives, and Guidelines either in the LRMP or in Volume 3 Appendix A, the Comparison of Action Alternatives. The Revised Forest Plan should clarify how sustainable recreation management area designation will be applied by including a table that summarizes sustainable recreation area designation.

The use of recreation zones is not a novel approach. We understand that sustainable recreation area designation is a planning overlay utilized for decision making and that Travel Management planning will include both the Sustainable Recreation Areas and ROS classification overlays. The Revised Land Management plan, page 84 provides an explanation of how the ROS will be applied.[7] A similar explanation of Destination Recreation Areas, General Recreation Areas and Challenging Backroad Areas is not provided.

The General Recreation Area (GRA) and Challenging Backroad Area (CBRA) planning overlays allow both non-motorized and motorized use where appropriate. The document includes the statement that for planning purposes the most restrictive planning overlay will apply. Due to the extensive restrictions that apply to motorized recreation this approach is usually detrimental to the expansion of motorized recreation.

For example, the CBRA classification includes the Desired Conditions and Guidelines that apply, which seem overly restrictive for motorized travel. For example, MA-CBRA-DC 04 states that [ldquo] there is a low density of designated roads and trails[rdquo]. The term [ldquo]low density[rdquo] is not defined. In addition, the CBRA designation includes a [ldquo]potential management approach[rdquo] that the [ldquo]density of recreation opportunities and infrastructure (including designated motorized routes and areas) should generally be lower in challenging backroad areas than in destination recreation areas.[rdquo] We submit that route density should be determined on a site specific basis, which should be considered as part of the sustainable recreation area designation.

The unfortunate effect of Sustainable Recreation Management Area Designation is that only when it is applied in conjunction with Travel Management will we be able to see how this works in practice. This is inconsistent with the stated goal of better informing the public about what types of use they can expect in the different SRMA[rsquo]s . This should be addressed by including a table that summarizes the application of sustainable recreation area designation.

We Object to Designation of the Pacific Crest Trail Management Area

In our previous comments on the DEIS we expressed concern about the about the approach being used for management of the Pacific Crest Trail, and that this might unnecessarily interfere with designation of adjacent motorized trails. The designation of a one mile wide Management Area is an unprecedented approach to trail management that we have not encountered in other Forest Plans.

The revised Sierra and Sequoia Land Management Plans cite FSH 1909.12, Chapter 20, Section 24.43 as the authority for designating a National Scenic Trail Management Area. We object to the use of the Forest Service Handbook in this capacity.

The authority of Handbook is based upon authority provided by the 16 USC sections cited but the Handbook

itself lacks sufficient authority to supersede the federal statutes, such as the National Trails System Act (NTSA.) The NTSA preserves the adjacent multiple use aspects of National Trails System trails.

We submit that the National Trails Systems Act and the 1982 Pacific Crest Comprehensive Management Plan [8] provide the authority for the management of the Pacific Crest Trail. The 1982 PCT Comprehensive Management Plan includes sufficient safeguards to protect the resource values of the Trail and protect the nature and purposes of the trail without encroaching on adjacent multiple use activities. The 1982 Comprehensive Management Plan applies to the PCT trail tread and immediate surroundings but does not specify designation of a management Area or buffer area adjacent to the Trail which would restrict adjacent multiple use activities.

The NTSA requires that adjacent multiple uses do not [ldquo]substantially interfere with the nature and purposes of the trail.[rdquo] This provision is sufficient to protect the Pacific Crest trail. The challenge will be to define [ldquo]substantial interference[rdquo] because this will have different meaning to Forest visitors with different interests.

Thank you for your consideration.

[1] USDA Forest Service. (2021). USDA COVID-19 Workplace Safety Plan.
<https://www.usda.gov/sites/default/files/documents/usda-covid-19-workplace-safety-plan.pdf>

[2] Stanturf, J. A., & Mansuy, N. (2021). COVID-19 and Forests in Canada and the United States: Initial Assessment and Beyond. *Frontiers in Forests and Global Change*, 4(July), 1[ndash]16.
<https://doi.org/10.3389/ffgc.2021.666960>

[3] U.S. Forest Service National Visitor Use Monitoring Survey Results National Summary Report 2020

[4] Personal Communication; California Department of State Parks and Recreation [ndash] 2022 OHV registrations.

[5] USDA Forest Service. (2022). Land Management Plan for the Sierra National Forest: Pre-objection version. June, 214. <https://www.fs.usda.gov/project/?project=3375>

[6] G21 Sequoia and Sierra OHV Grant Applications, California Department of Parks, and Recreation , OHMVR General Application.

[7] USDA Forest Service. (2022). Land Management Plan for the Sierra National Forest: Pre-objection version. June, 214. Page 84 <https://www.fs.usda.gov/project/?project=3375>

[8] Comprehensive Management Plan for the Pacific Crest National Scenic Trail, January 1982, USDA Pacific Northwest Region.