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First name: Steven
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Organization: CalWild
Title: Rivers Director
Comments: See attached objections and cited non-USFS background documents.

Sierra and Sequoia National Forests Plan Revision Objection

August 15, 2022

Responsible Officials: Theresa Benson, Sequoia National Forest Supervisor

Dean Gould, Sierra National Forest Supervisor

Lead Objector: Steven L. Evans, Rivers Director

Objector: California Wilderness Coalition (CalWild)

Dear Deputy Regional Forester Elizabeth Berger:

CalWild protects and restores the state[rsquo]s wildest natural landscapes and watersheds on public lands. These important wild places provide clean air and water, refuges and habitat connections for plants and wildlife, immense cultural values, and outstanding opportunities for recreation and spiritual renewal. These wild places also play an important role in resisting and mitigating the effects of climate change. Calwild is the only statewide organization dedicated solely to protecting and restoring the wild places and native biodiversity of California[rsquo]s public lands.

CalWild has been involved in the revision of the Sierra and Sequoia National Forests Plan Revision since pre-planning was initiated in 2008 for the first plan revisions in California. Substantive CalWild response to this process includes reviewing and commenting on the 2013 assessments for both forests, submitting extensive scoping comments in 2014, reviewing and commenting on the pre-draft wilderness evaluation and wild and scenic river (WSR) inventories for both forests, as well as reviewing and submitting extensive detailed comments focused on WSRs and Wilderness Recommendations in the 2016 Draft Plans and 2019 Revised Draft Plans. CalWild has also met with both Forest Supervisors and local, regional, and national planning staff on several occasions to discuss the planning process and plan details.

CalWild[rsquo]s detailed comments have largely focused on the WSR inventory and wilderness evaluation and recommendations components for the Forest Plan Revisions. For the WSR inventory, this involved nominating

numerous streams for consideration, documenting potentially outstandingly remarkable values, and encouraging a rivers system approach to identifying eligible streams. CalWild[rsquo]s wilderness evaluation efforts have focused on documenting the wilderness values of key roadless areas and adjusting boundaries to avoid possible conflicts with other uses (mountain bikes, motorcycles, fixed-rope rock climbers, etc. These issues are largely the subject of our objection.

Sincerely,

Steven L. Evans

CalWild Rivers Director

Summary of CalWild[rsquo]s Objection Issues and Suggested Resolutions:

1. Existing WSR Management: Adopt as WSR management standard in both Final Plans: DA-WSR-STD 08: Monitor the impacts of National Forest uses (visitor use, grazing, mining, etc.) and if monitoring documents adverse impacts on a wild and scenic river, the appropriate Comprehensive River Management Plan shall be updated to resolve the problem.
2. 2019 Sierra Forest Purge of Eligible WSRs: Organize a quick Interdisciplinary Team review of the many previously eligible streams that were purged between the 2016 and 2022 Sierra draft plans (see below). We request that a stream[rsquo]s contribution to the biotic integrity of its watershed and the larger streams into which they flow be considered in this review.
3. Kings Eligible WSR: Re-adopt the list of ORVs described in the 1990-91 KRSMA Plan and determine the provenance and veracity of the alleged Botany ORV identified in Table C-15.
4. Dinkey Creek Eligible WSR & Tributaries: Find all Dinkey Creek segments to possess a Scenery ORV and a combined Ecology/Wildlife ORV and expand segment 4[rsquo]s History/Culture ORV to include the historic resorts that provided visitor services on Dinkey Creek. Review the formerly eligible tributaries of Dinkey Creek to determine which ones may share identical values and should be considered eligible from a rivers system perspective.
5. Mono Creek Eligible WSR: Scenery in the upper Mono Creek segments was found to be [ldquo]unique[rdquo] in the 2016 and it should be reinstated in the Final Plan/FEIS. The Prehistory (History/Culture) ORV for lower Mono Creek segment 4 should also be reinstated.
6. South Fork San Joaquin Eligible WSR: Find the upper and lower segments of the South Fork San Joaquin River to be eligible due to its Scenery and Cultural ORVs, and specifically recognize the outstanding Native American cultural value associated with Mono Hot Springs.
7. San Joaquin Eligible WSR (3.233.1): Clarify the actual length of the segment, reinstate the scenery, fish, and geology ORVs identified in 1995, and add the newly determined whitewater recreation ORV. If a real and credible proposal to raise Mammoth Pool occurs in the future, conduct a suitability study to determine if the segment should be added to the existing suitable segment of the San Joaquin or removed from eligibility/suitability to facilitate Mammoth Pool expansion.
8. San Joaquin Eligible WSR (3.233.4): In addition to its Scenery ORV, recognize a Cultural (Prehistory) ORV for the San Joaquin River segment 3.233.4.
9. San Joaquin Eligible WSR (3.233.6): In addition to its Scenery ORV, recognize a Cultural (Prehistory) ORV for

the San Joaquin River segment 3.233.6.
10. Granite Creek, West Fork, East Fork Eligible WSRs: Reinstate the Scenery, Geology, and Prehistory ORVs for the appropriate segments of Granite Creek, EF Granite Creek and WF Granite Creek, and retain the whitewater recreation ORV identified in the 2022 Final. In addition, add a geology ORV for Granite Creek from the Ansel Adams Wilderness boundary to its confluence with the NF San Joaquin because it possesses the same geological value as the eligible/suitable segment of the North Fork.
11. California & Nelder Creeks Eligible WSRs: Follow a systems approach and find all of Nelder and California Creeks, from their sources to at least their confluence, to be eligible and add a History ORV in recognition of the [ldquo]unique[rdquo] historical values of the Nelder Grove Historic Area.
12. Iron Creek Eligible WSR: Follow a systems approach and find Iron Creek to be eligible due to its Scenery ORV, which complements the outstanding values and biotic integrity of the SF Merced WSR, into which Iron Creek flows.
13. Bishop Creek Eligible WSR: Reinstate eligibility for Bishop Creek due to its Cultural (Prehistory) ORV and Botany ORV (associated with the RNA).
14. MF Tule Eligible WSR: Recognize popular day use recreation and whitewater boating on the MF Tule as a recreation ORV.
15. Salmon Creek, Bull Run Creek, & Alder Creek Eligible WSRs, and Peppermint Creek: Recognize that all these tributaries contribute to the NF Kern[rsquo]s [ldquo]good[rdquo] biotic integrity. Add a fish ORV (KRRT) to the already eligible segments of Bull Run, Salmon, and Alder Creeks and determine Peppermint Creek to be eligible due to its fish ORV.
16. Salmon & Freeman Creeks Classifications: The upper segments of Salmon Creek and Freeman Creek are located in roadless areas and should be classified as Wild.
17. Lower Kern River 2.104.4: We believe a simple cut and paste error accidently eliminated the Recreation ORV for this segment, which offers the most reliable whitewater experience to millions of southern California residents. The Recreation ORV should be reinstated for Kern River segment 2.104.4.
18. Lower Kern River segment 2.104.6: Not only does this segment provide world famous class V-V+ whitewater, it offers important river-based family recreation opportunities for low income communities of color. Recognize Kern River segment 2.104.6 as possessing a Recreation ORV (whitewater, family recreation).
19. Greenhorn Creek: Recognize a Recreation ORV for spelunking in the unique Greenhorn Creek Cave.
20. Greenhorn, Lucas, Stark, and MF Erskine Creek Classifications: Classify the appropriate segments of Greenhorn, Lucas, Stark, and MF Erskine Creeks in inventoried roadless areas as Wild.
21. Recommended Wilderness: Sit down with interested stakeholders to work out boundaries that meets most needs. Focus on Devil Gulch-Ferguson Ridge, Ansel Adams Mt. Raymond, Ansel Adams San Joaquin River, Bear Mountain, Sycamore Springs, Monarch West Kings River Addition, Golden Trout Addition, Domeland West Addition, Cannell Peak, & Stormy Canyon Potential Wilderness areas. Based on this effort, include revised proposals for recommended wilderness in the Final Plan and Record of Decision.
22. Roadless Area Protection: Allocate roadless areas not recommended for Wilderness to Backcountry Area management to protect their roadless and wilderness qualities, or at the minimum, specifically adopt RACR protections as Forest Plan management direction.

Proposed New Management Direction for Existing WSRs

The 2013 Sequoia Forest Assessment identified visitor impacts on the North Fork Kern WSR, noting that [ldquo]Overcrowding, congested parking and poor sanitation practices in the Upper Kern River corridor demonstrate the need for more intensive management of this area.[rdquo][1]

The Sierra National Forest Assessment raised similar concerns about the Merced WSR, noting that [ldquo]There is a trend toward unmet recreational demand in the corridor of the Merced WSR,[rdquo] and high use by the public was leading to trash and sanitation issues, with a trend towards larger groups of dispersed campers, less knowledge of hunting and fishing regulations, and less knowledge of the leave no trace ethic.[2]

In its scoping, draft plan, and revised draft plan comments, CalWild recommended adoption of a management standard that includes monitoring of visitor use impacts on WSRs and requires updating of Comprehensive River Management Plans (CRMPs) to resolve such problems. No specific management direction was proposed in either plan, but they did include as a Potential Management Approach updates of comprehensive river management plans, as needed, to ensure protection of each designated river[rsquo]s free-flow, water quality, and outstandingly remarkable values, in response to changing conditions (including monitoring) or new information (such as related to visitor management).[3]

Given that adverse impacts on WSR values are occurring now from poorly managed visitor use, CalWild is uncomfortable with the [ldquo]Potential Management Approach.[rdquo] There is no guarantee that it will ever be implemented. And although interim steps can be taken (like the current Forest Order 0513-22-04, closing the Old Goldledge Dispersed Campground on the NF Kern WSR on busy holiday weekends in the summer), Forest Orders are difficult to adopt until considerable damage and disruption has already occurred. Adopting a management direction provision requiring WSR monitoring and updating appropriate CRMPs to address visitor and other National Forest use impacts (from grazing, mining, etc.) on WSRs is the permanent solution to this chronic problem.

CalWild recommends adoption of a management standard in both Final Plans that requires monitoring of use impacts on WSRs and updates of the appropriate CRMPs when needed to resolve these impacts. Adopting this provision as a Management Standard is crucial because neither the law, regulations, nor guidelines require updates of CRMPs. The existing CRMPs for the Merced, Kings, and Kern WSRs are now all more than 25 years old and fail to reflect significant changes in circumstances such as climate change impacts on hydrology, changes in recreation technology (mountains bikes, electric bikes, more highly maneuverable kayaks, etc.), and increasingly heavy use by the public of outdoor river-based recreation opportunities.

Suggested Resolution: Adopt as WSR management standard in both Final Plans: DA-WSR-STD 08: Monitor the impacts of National Forest uses (visitor use, grazing, mining, etc.) and if monitoring documents adverse impacts on a wild and scenic river, the appropriate Comprehensive River Management Plan shall be updated to resolve the problem.

River Systems Approach and Biotic Integrity of Watersheds

Forest Service land management planning guidance encourages a river systems approach to the identification of potentially eligible rivers:

Consider the entire river system, including the interrelationship between the main stem and its tributaries and their associated ecosystems which may contain outstandingly remarkable values. At a minimum, a river study area includes the length of the identified river segment and the land within one-quarter mile of each river bank[rsquo]s ordinary high water mark along the river segment. The river corridor to be studied may be wider to

include areas beyond the minimum one-quarter mile from a bank[rsquo]s high water mark that may be needed to protect river-related outstandingly remarkable values, other important river resources or facilitate management of the river area. For example, the boundary of a study river corridor may be extended to include key scenic features, upstream spawning areas in tributaries, or the entire river floodplain.[4]

CalWild raised early in the planning process the issue of needing to conduct WSR inventories from a river systems perspective. Rivers are linear systems. Natural processes and human activities alike, upstream and downstream of a WSR, may affect river flows and values. It[rsquo]s best to be as expansive as possible when identifying eligible WSRs, particularly by considering the contribution of river flow provide by upper segments and watersheds, as well as the tributaries and downstream segments that may contribute or complement river values.

The response to this concern varies between the Final Plans. The Sequoia WSR inventory best represents the river systems approach. Numerous tributaries to the North and South Fork Kern WSRs were found eligible because they contribute water flow, provide habitat, and offer restoration opportunities for outstandingly remarkable native wild trout species (Little Kern Golden Trout, California Golden Trout, Kern River Rainbow Trout) that make these rivers suitable for designation. Even when there was no direct fishery issue to encourage expansive thinking, the Sequoia Final Plan also identified as eligible several tributaries of the lower Kern River and Middle Fork Tule River that share similar values, creating the opportunity to protect nearly complete upper river systems.

On the other hand, the Sierra Final Plan limited its river systems approach to a handful of streams where strong public comment encouraged more of the river to be considered eligible. For example, the eligibility of Dinkey Creek was revised from two unconnected eligible segments totaling 4.7 miles in the 2019 Revised Final Plan/RDEIS to all 29 miles being eligible in the 2022 Final Plan/FEIS. While gratified by this positive change, CalWild must note that there was apparently no consideration of the benefit of including Dinkey Creek[rsquo]s tributaries that were previously identified as eligible in 2016 but not in 2019, including the South Fork Dinkey Creek, Bear Creek, Glen Meadow Creek, Bear Meadow Creek, Cow Creek, and Rock Creek. The flows from and the values of these creeks contribute to the flows and values in the 29 eligible miles of Dinkey Creek.

Similar opportunities to consider potentially eligible tributaries of the Kings and Merced WSRs, and the eligible/suitable segments of the upper San Joaquin River (North, Middle, South Forks, and main stem) were also ignored in the Sierra Final Plan. However, CalWild appreciates that in response to our 2019 comments, much of Granite Creek [ndash] a major tributary of the NF San Joaquin [ndash] was reinstated as an eligible stream after it and scores of other previously eligible stream segments were purged between the 2016 and 2019 plans.

Failure to take a river systems approach appears to be a significant factor in the huge purge of previously eligible WSRs identified in the 2016 Sierra Revised Forest Plan and the far fewer eligible stream in the 2019 Sierra Final Plan. Some of these problems have been fixed (i.e. Dinkey Creek) but many have not. A river systems approach would be particularly helpful in identifying tributaries that contribute to the biotic integrity of the larger rivers and watersheds.

The primary watersheds of the southern Sierra National Forest and most of the Sequoia National Forest, encompass the largest block of watersheds with good biotic integrity in the mountain range.[5] This includes the Tule and Kern watersheds on the Sequoia, the Kings watershed on both the Sierra and Sequoia Forests, and the Sycamore Creek and Merced/South Fork Merced watersheds on the Sierra Forest. The biotic integrity of these watersheds was assessed using a number of factors, including the amount of roadless and roaded acres in the watershed, presence of native and non-native fish, the number of dams and diversions, and several other factors.

Based on this assessment, watersheds were indexed on a scale of 1 to 100, with watersheds rated at 100 possessing the highest level of biotic integrity in the Sierra Nevada. It is no coincidence that the southern Sierra watersheds from the Kings to the North and South Forks of the Kern were indexed as possessing [ldquo]good[rdquo] biotic integrity due to the amount of roadless areas, number of undammed free flowing streams, and the survival to date of native fish such as the Little Kern golden trout, California golden trout, and Kern River rainbow trout. Tributaries that flow into existing WSRs with good biotic integrity like the Kings, North Fork Kern, and South Fork Kern are contributing to that integrity. This is the first significant forest planning opportunity since the publication of Biotic Integrity of Watersheds to identify key tributaries that contribute to biotic integrity.

CalWild particularly appreciates that the 2022 FEIS Appendix C now cites biotic integrity as a factor in several WSR eligibility findings, including Boulder Creek and Grizzly Creek on the Sierra Forest; and Little Kern Lake Creek, Osa Creek, Rattlesnake Creek, Brush Creek, Dry Meadow Creek, Fish Creek, and Freeman Creek on the Sequoia Forest.

Although CalWild supports the inclusion of these citations and the resulting eligibility findings, it must be noted that biotic integrity should or could be cited for many other existing eligible WSRs (such as the eligible tributaries to the lower Kern eligible WSR and SF Kern WSR). The contribution of a particular stream to the biotic integrity of its watershed and for the larger streams into which they flow should be considered for all potential WSR candidates. This is particularly pertinent for tributaries of the Kings River that were purged between the 2016 and 2019 plans, including most of the NF Kings River, all tributaries to Dinkey Creek, and many tributaries of the San Joaquin River and SF Merced WSR.

Suggested Resolution: CalWild requests a quick Interdisciplinary Team review of the many previously eligible streams that were purged between the 2016 and 2022 Sierra draft plans (see below). We request that a stream[rsquo]s contribution to the biotic integrity of its watershed and the larger streams into which they flow be considered in this review.

Review the 2016-2019 Sierra Forest Purge of Eligible WSRs

The 2016 Sierra Plan/DEIS inventoried 1,482.4 miles of candidate streams and found 633.5 miles to be WSR eligible. But the 2019 Sierra Plan/RDEIS eliminated most of these streams, only identifying 46.9 miles to be WSR eligible, resulting in a purge of 587 eligible miles. Virtually all of the formerly eligible segments in 2016 were eliminated because a review by the Sierra Forest Supervisor determined that they did not possess ORVs.[6] The primary reason why river values were not considered outstanding in most of these eliminations was because one or more values were not considered, [ldquo]unique, rare, or exemplary.[rdquo] Non-exemplary values resulted in the elimination of 32 river segments totaling more than 186 miles between the 2016 and 2019 draft plans. Even though eligible river mileage increased from 46.9 miles to 146.3 miles in the 2022 Final Plan/FEIS, most of the 2019 eliminated segments remain eliminated and the primary reason cited remains non-exemplary values.

CalWild has perceived a pattern in Forest Service WSR eligibility reviews based on what we believe is a misinterpretation of the basic definition of an ORV being a value that is [ldquo]rare, unique, or exemplary.[rdquo] First of all, it[rsquo]s clear that this guidance does not require a river value to meet all three criteria or even two of the criteria [ndash] a value can be considered outstanding if it is unique, rare, OR exemplary. According to the 2019 and 2022 WSR inventory narratives, many streams were eliminated from eligibility because they supposedly share the same scenery, recreation, geology, and historical/cultural values. Dozens of streams were discounted because the agency apparently believes that the share similar scenery, recreation, geology, and historical/cultural values and none were considered exemplary.

Even two segments of the same stream sharing the same value were subject to seemingly arbitrary and subjective exemplary criteria. This occurred with Mono Creek. In the 2016 draft, two segments of Mono Creek upstream Edison Reservoir were found to possess a Prehistory ORV and the one segment of Mono Creek downstream of Edison was identified with the same Prehistory ORV (Mono Trail Traditional Cultural Property that stretches from the Mammoth area to Mono Hot Springs, which includes all three Mono segments). But the 2019 draft plan eliminated the lower segment of Mono Creek downstream of Edison Reservoir and this elimination persists in the 2022 plan. Apparently, CalWild[rsquo]s comments on the 2019 draft citing various documents showing that all segments of Mono Creek share the same Prehistory ORV did not move the agency to change its opinion (more on this in the river-specific section of this objection).

The Forest Service misinterpretation of the unique, rare, or exemplary criteria apparently leads to a [ldquo]there can only be one[rdquo] mindset as the agency reviews similar values of streams in the same region. If multiple streams share similar ORVs in the same region of comparison, the agency tendency is to choose just one of those streams as eligible based on the [ldquo]exemplary[rdquo] criteria.

Several eligible streams in the 2016 draft were also eliminated in the 2019-2022 drafts because they apparently failed to possess both unique and exemplary values, with no mention of which values are rare. The basic definitions of unique, rare, and exemplary clearly creates three categories. A unique value on a river is one of a kind and not like anything else. A rare value is seldom occurring and uncommon. An exemplary value represents the best of its kind. Based on these definitions, one would expect to have fewer rivers in a region possessing unique or exemplary values, but there could multiple rivers in region that possess rare values. But few streams were cited as possessing or not possessing rare ORV, raising the question whether the rare criteria was inadvertently conflated with the unique and exemplary criteria.

Suggested Resolution: Establish an interdisciplinary team of resource and program specialists with representatives from the local, state, and national levels of the Forest Service to review the formerly eligible streams identified in the 2016 Sierra draft plan that were eliminated in the 2019 and 2022 drafts because of supposed non-exemplary or unique values. Include in this review the contribution of tributaries to the biotic integrity of their watersheds and to the larger streams into which they flow.

Stream-Specific Comments [ndash] Sierra National Forest WSR Inventory

Kings River [ndash] 2.106.1-3 [ndash]

FEIS Appendix C provides conflicting information about the ORVs that make the Kings River eligible. Eligibility for the three segments of the Kings River starting at elevation 1,595 feet and ending at Pine Flat Reservoir was first determined in the 1990 Draft Kings River Special Management Area and Wild and Scenic River Plan (KRSMA), which was finalized in 1991. Even though the FEIS specifically states that the Forest Service interdisciplinary team reviewed the 1991 plan and found no changed circumstances or new information affecting the river[rsquo]s ORVs and previous eligibility determinations, the information provided in FEIS Appendix C Table C-15 concerning the river[rsquo]s ORVs is not the same as the ORV information provided in the 1990-1991 plan. And the information provided about ORVs in the detailed segment descriptions for the Kings River on pages C-266-270 is not identical to the ORV information in either FEIS Table C-15 or the 1990-91 Plan. Furthermore, ORV information in one detailed narrative conflicts with the same narrative summary.

These discrepancies include:

Kings segment 2.106.1 [ndash] A Botany ORV is identified in Table C-15, but it is not mentioned in the 1990-91 KRSMA Plan or in the FEIS Appendix C narratives (pgs. C-266-270). The 1990-91 KRSMA Plan also identifies a Fish ORV (largest state-designated Wild Trout Stream, finest freestone river for trout), which is also noted in the FEIS Table C-15, but the FEIS narratives declare fish values to be non-remarkable. A Geology ORV is recognized for this segment in the 1990-91 Plan and in Table C-15, but it is not mentioned in the FEIS narratives.

Kings River Segment 2.106.2 [ndash] Geology and Fish are recognized ORVs in the 1990-91 Plan and FEIS Table C-15 but not in the FEIS narratives.

Kings River Segment 2.106.3 [ndash] Fish is a recognized ORV in the 1990-91 Plan and FEIS Table C-15 but not in the FEIS narratives. The narrative[rsquo]s detailed description includes a Recreation ORV for this segment but the Recreation ORV is not listed in the narrative summary.

Management and protection of the Kings River requires a set of facts that everyone agrees on. The information provided about Kings River ORVs in the FEIS is a recipe for anarchy and conflict. The competing lists of ORVs must be reconciled and final list provided in a corrected appendix. We recommend that the final plan adopt the ORV documented in the 1990-91 Plan, with consideration of the new Botany value (if this proves not be an outright typo).

Suggested Resolution: Re-adopt the list of ORVs described in the 1990-91 KRSMA Plan and determine the provenance and veracity of the alleged Botany ORV identified in Table C-15.

Dinkey Creek [ndash] 3.68.1-6 [ndash]

Scenery ORV [ndash] No segment of Dinkey Creek was found to possess a Scenery ORV, despite RDEIS documentation of high scenic values for segments 1 ([ldquo]spectacular views of granite domes and lakes[rdquo]), 3 & 4 ([ldquo]Variety Class A Distinctive[rdquo]). In its comments on the 2019 RDEIS, CalWild noted that the entire length of Dinkey Creek represents a continuum of outstanding scenery throughout all its segments. Although Dinkey Creek[rsquo]s may not be unique, it is exemplary and certainly rare, even in the scenery-rich environment of the Sierra Forest (the region of comparison for Scenery ORVs). Although scenery along all 29 miles of Dinkey Creek varies, agency guidelines do not require outstanding scenery along all segments for a stream to possess outstanding scenery overall.[7] See the attachment at the end of this document for documentation of Dinkey Creek[rsquo]s continuum of outstanding scenery.

History ORV [ndash] The historic Dinkey Creek truss bridge is recognized as an outstanding History ORV for Dinkey Creek segment 4. The bridge played a major role in attracting tourists who came to visit the McKinley Grove. Workers from the nearby Pine Logging Camp spent much of their off time visiting Dinkey Creek resorts, which also provided lodging and respite for visitors to the McKinley Grove. Before the bridge was built, Fremont and Smith visited Dinkey Creek in their explorations of California and hundreds of others frequented Dinkey Creek to mine gold and graze sheep. The RDEIS ignores these facts about the overall outstanding history of Dinkey Creek and limits the History ORV to the truss bridge.

Ecology/Wildlife ORV [ndash] Dinkey Creek drops more than 8,400 feet over 30 miles, transecting a broad range of elevation, vegetation, and ecozones. Old growth forests along Dinkey Creek and within the watershed support Pacific fisher, American martin, California spotted owl and other listed species and species of conservation concern. This constitutes a combined Ecology and Wildlife ORV.

Previously Eligible Tributaries [ndash] Tributaries of Dinkey Creek, including South Fork Dinkey Creek, Cow Creek, Rock Creek, Bear Creek, Glen Meadow Creek, and Bear Meadow Creek, were determined eligible in the

2016 draft but not in the 2016 draft or 2022 final. All these tributaries were dropped due to a supposed lack of ORVs. Many of the tributaries share similar if not identical scenery, geology, and history/cultural values. For example, Glen Meadow Creek possessed a History ORV due to the Pine Logging Camp. Workers at this camp often visited and recreated at the resorts on Dinkey Creek. It makes sense from a rivers system perspective to find both streams to possess an outstanding history value that connects them.

Suggested Resolution: Find all Dinkey Creek segments to possess a Scenery ORV and a combined Ecology/Wildlife ORV and expand segment 4[rsquo]s History/Culture ORV to include the historic resorts that provided visitor services on Dinkey Creek. Review the formerly eligible tributaries of Dinkey Creek to determine which ones may share identical values and should be considered eligible from a rivers system perspective.

Mono Creek [ndash]

Mono Creek segments 1-2 (3.166.1-2) [ndash] The sole ORV in the 2019 RDEIS is prehistory. This is described as the [ldquo]Mono Trail Traditional Cultural Property from Mammoth area on the Inyo National Forest to the Mono Hot Springs Area is eligible for National Register of Historic Places listing.[rdquo] A scenery ORV identified in the 2016 DEIS was eliminated, despite this documentation of high scenery values: [ldquo]Mono Recesses/peaks and granite-walled river canyons are unique visual features of the Sierra Crest.[rdquo] This scenery value was eliminated because it is [ldquo]not exemplary.[rdquo]

Mono Creek segment 4 (Vermillion Valley Dam to Edison Reservoir, 3.166.4) [ndash] This lower segment was found in the 2016 DEIS to possess the same prehistory value as segments 1-2 but this value was dropped and segment 4 found to be ineligible in the 2019 RDEIS. The Mono Trail Traditional Cultural Property that stretches from the Mammoth area to Mono Hot Springs clearly includes the lower segment of Mono Creek to its confluence with the SF San Joaquin River. This is confirmed by a map of Native American trails and associated sites that CalWild included in its 2019 comments.[8]

Suggested Resolution: Scenery in the upper Mono Creek segments was found to be [ldquo]unique[rdquo] in the 2016 and it should be reinstated in the Final Plan/FEIS. The Prehistory (History/Culture) ORV for lower Mono Creek segment 4 should also be reinstated.

SF San Joaquin River (3.260.2) [ndash]

The 28-mile segment of the SF San Joaquin River between Florence Dam/Reservoir and the main stem San Joaquin confluence was found eligible in the 2016 DEIS due to outstanding scenery and geology values. The 2019 DEIS eliminated its eligibility, noting without any specific information or analysis that [ldquo]similar views exist elsewhere within the region[rdquo] and that the South Fork[rsquo]s scenery was [ldquo]not

exemplary.[rdquo] The 2022 FEIS found a Recreation ORV associated with a whitewater boating run for this segment. The systems approach recommended in agency guidelines would likely consider that this lower segment of the South Fork shares identical outstanding scenery, recreation, geology, and cultural values as the eligible/suitable segments of the upper South Fork San Joaquin, the North and Middle Forks, main stem San Joaquin.

Mono Hot Springs is located on this segment of the SF San Joaquin. The Hot Springs is specifically cited as part of the Traditional Mono Trail Cultural Property that makes the upper segments of Mono Creek to be eligible. Mono Hot Springs was an important crossroad for Native American trade and travel routes along the South Fork, Mono Creek, Big Creek, Rancheria Creek, and Rattlesnake Creek and it is important as a Native American cultural site. The trans-Sierra trail that passes by Mono Hot Springs facilitated trade between the Mono tribe west of the Sierran crest and tribal groups on the eastern side. The western Mono traditions include both this seasonal trading activity and spiritual use of the springs.[9] The North Mono Tribe[rsquo]s constitution refers to [ldquo]the sacred grounds of Mono Indian Hot Springs[rdquo] in the description of tribal territory.[10] According to Mr. Johnny Marvin, a member of the Western Mono Band, both Paiute and Western Mono used Mono Hot Springs.[11] The 1995 Sierra National Forest Plan recognized the cultural importance of Mono Hot Springs by adopting a Standard and Guideline that [ldquo][hellip]retains Mono Hot Springs in a near-natural condition to ensure availability of the springs for traditional Native American use.[rdquo][12] The Constitution of the North Fork Mono Tribe describes the territory of the tribe in Article 1 as including [ldquo][hellip]the South and Middle Forks of the San Joaquin River, Vermillion Valley (now partially flooded by Edison Reservoir) and the sacred grounds of Mono Indian Hot Springs.[rdquo][13]

Suggested Resolution: Find the upper and lower segments of the South Fork San Joaquin River to be eligible due to its Scenery and Cultural ORVs, and specifically recognize the outstanding Native American cultural value associated with Mono Hot Springs.

San Joaquin River (3.233.1) [ndash]

Depending on the document, this segment is listed as 1, 1.3, or 2 miles long [ndash] this should be clarified. The 1995 Plan/FEIS found the segment eligible but not suitable due to possible future expansion of Mammoth Pool Reservoir. The 1995 ROD promised [ldquo]further consideration[rdquo] of suitability if the expansion did not occur (it didn[rsquo]t). We challenge the notion that the main stem San Joaquin[rsquo]s Scenery, Fish, and Geology ORVs disappear in the final two miles of the river upstream of the existing Mammoth Pool Reservoir.

Suggested Resolution: Clarify the actual length of the segment, reinstate its scenery, fish, and geology ORVs identified in 1995, and add the newly determined whitewater recreation ORV. If a real and credible proposal to raise Mammoth Pool occurs in the future, conduct a suitability study to determine if the segment should be added to the existing suitable segment of the San Joaquin or removed from eligibility/suitability to facilitate Mammoth Pool expansion.

San Joaquin River (3.233.4) [ndash]

Determined eligible due to its Recreation (whitewater) ORV, we believe this segment of the San Joaquin River also possesses a Cultural (Prehistory) ORV. Hindes[rsquo]map of Mono Indian sites and trails shows a Mono Tribe trail west of this San Joaquin River segment, in the vicinity of Kinsman Flat. Kinsman Flat is specifically cited as part of the North Mono Tribe[rsquo]s territory in the Tribe[rsquo]s Constitution. In addition, Aldern notes that Kinsman Flat is one of many places criss-crossed by tribal trails, some of which are still visible.

Suggested Resolution: Recognize a Cultural (Prehistory) ORV for the San Joaquin River segment 3.233.4.

San Joaquin River (3.233.6) [ndash]

Determined eligible due to its Recreation (whitewater) ORV, we believe this segment of the San Joaquin River also possesses a Cultural (Prehistory) ORV. Hindes[rsquo]map of Mono Indian sites and trails shows a trail south of this San Joaquin River segment. Aldern notes that tribal trails crossed the San Joaquin River at several points, notably at Horseshoe Bend, which the Mono called Tsobotebau (crossing). Horseshoe Bend is also cited by Aldern as a Mono Tribe [ldquo]point of interest.[rdquo] Former North Mono Tribe Council Chairman Ron Goode includes the Horseshoe Bend reach of the San Joaquin River in his map of tribal allotments associated with Tsobotebau and Good[rsquo]s map shows the Horseshoe Bend Trail as as part of a system of [ldquo]ethnographic[rdquo] trails within the preliminary Tsobotebau boundary.

Suggested Resolution: Recognize a Cultural (Prehistory) ORV for the San Joaquin River segment 3.233.6.

Granite Creek (3.107.1-3), East Fork Granite Creek (3.83), West Fork Granite Creek (3.294.1-2) [ndash]

The 2016 DEIS found the East and West Forks to possess a Geology ORV ([ldquo]Glaciated landscape, glaciate scoured bedrock and valleys, moraines, significant and unique glacial landforms as spectacular as Yosemite National Park.[rdquo]) and a 2-mile segment of main stem Granite Creek to possess a Cultural/Prehistoric ORV ([ldquo]...a NRHP eligible Late Archaic period prehistoric trans-Sierra economic exchange corridor. This is a unique trans-Sierra corridor.[rdquo]). The 2019 RDEIS determined all segments to be ineligible, stating [ndash] without any supporting information [ndash] that similar geology [ldquo]exists elsewhere[rdquo] and that the cultural sites are [ldquo]not unique.[rdquo] A systems approach should find that all of Granite Creek and its East and West Forks possess similar if not identical values as the eligible/suitable segments of upper San Joaquin River system and that Granite Creek complements the free-flowing nature and ORVs of the North Fork San Joaquin (into which its flows).

Suggested Resolution: Reinstate the Scenery, Geology, and Prehistory ORVs for the appropriate segments of Granite Creek, EF Granite Creek and WF Granite Creek, and retain the whitewater recreation ORV identified in

the 2022 Final. In addition, add a geology ORV for Granite Creek from the Ansel Adams Wilderness boundary to its confluence with the NF San Joaquin because it possesses the same geological value as the eligible/suitable segment of the North Fork.

California & Nelder Creeks [ndash]

Short segments of Nelder and California Creeks within the Nelder Grove Historic Area were found eligible due to scenery, recreation, and botany (Giant Sequoia groves) ORVs. CalWild[rsquo]s recommendation that a river systems approach would find both creeks eligible from their source and extending downstream beyond the NGHA were ignored. There is no explanation as to why these streams do not possess a Historical/Cultural ORV given the establishment by the Forest Service of the Nelder Grove Historical Area in the 1991 Forest Plan. The Nelder Grove Historic Area was established to preserve Giant Sequoias (the Botany ORV), early railroad logging activity, and prehistoric habitation sites by Native Americans.[14] According to the Forest Service, [ldquo][hellip]the grove has been managed as an historical site, preserving the uniqueness and historical significance of the giant sequoias and what has occurred beneath their branches[hellip]Near the Nelder Grove Campground is an interpretive area containing several historical replicas and displays. Two restored cabins from the center of the site with life-size replications of cross-log and two-pole logging chutes along the original paths loggers used 100 years ago[hellip]Archaeological studies found the Southern Sierra Miwok were well aware of the grove and had been for several thousand years, camping while gathering acorns and hunting.[rdquo][15]

Suggested Resolution: Follow a systems approach and find all of Nelder and California Creeks, from their sources to at least their confluence, to be eligible and add a History ORV in recognition of the [ldquo]unique[rdquo] historical values of the Nelder Grove Historic Area.

Iron Creek [ndash]

A tributary of the SF Merced WSR, Iron Creek was found eligible in the 2016 DEIS due to its Scenery ORV but was dropped in the 2019 RDEIS and the 2022 FEIS because its scenery is [ldquo]similar[rdquo] to the SF Merced WSR (into which Iron Creek flows). Iron Creek[rsquo]s outstanding scenery is part of and complements not only the SF Merced[rsquo]s outstanding scenery but also its good biotic integrity. The USFS ineligibility decisions fails to consider the entire river system per guidelines.

Suggested Resolution: Follow a systems approach and find Iron Creek to be eligible due to its Scenery ORV, which complements the outstanding values and biotic integrity of the SF Merced WSR, into which Iron Creek flows.

Bishop Creek [ndash]

A tributary of the SF Merced WSR, Bishop Creek was found eligible in the 2016 DEIS due to its outstanding prehistory value (an NHRP eligible Early Archaic occupation site). A potential Botany ORV was rejected by the USFS because the existing of the Bishop Creek Proposed RNA and its targeted plant community [ndash] Ponderosa pine forest [ndash] is not considered creek-dependent. The creek was ineligible in the 2019 RDEIS and 2022 FEIS. The rejection of the Historical/Cultural (Prehistory) ORV ignores CalWild[rsquo]s and other public

comments, WSR eligibility guidelines for identifying Historical/Cultural ORVs, and the directive to consider entire river systems. As for the Botany ORV, we need to ask why Giant Sequoia groves are considered to be outstanding botany values on several streams but the ponderosa pines in the Bishop Creek RNA are not?

Suggested Resolution: Reinstate eligibility for Bishop Creek due to its Cultural (Prehistory) ORV and Botany ORV (associated with the RNA).

SEQUOIA NATIONAL FOREST STREAM-SPECIFIC COMMENTS

Middle Fork Tule River [ndash]

CalWild appreciates the apparent river systems approach taken in the 2022 plan to determine eligibility of the Middle Fork Tule River and its tributaries, the North Fork Middle Fork and the South Fork Middle Fork. However, we disagree that the only ORVs for the Middle Fork from the North/South Forks confluence to the Forest Boundary is history/prehistory.[16] The FEIS acknowledges the popularity of two concessionaire-run day use sites and a river access point but discount this use as not meeting unique, rare, or exemplary criteria. Further, it discounts whitewater kayaking on this segment as being limited to [ldquo]a small number[rdquo] of kayakers capable of safely navigating the river.

The practical impact of the Forest Service[rsquo]s nearly exclusive focus on rivers attracting recreation visitors from outside the region is the exclusion of popular day use sites heavily used during the summer season by residents of local communities, which are often low income and communities of color. This is a consistent problem with WSR inventories under the current guidelines. For example, similar popular river-based day use recreation sites were not considered eligible in the 2005 Southern California Forest Plan Revisions for example. With easy access from Highway 190, hundreds if not thousands of visitors from Porterville and other nearby valley communities depend on the recreation opportunities the Middle Fork provides. A Forest Service finding of a recreation ORV for this segment could eventually lead to designation of the river by Congress and increased funding for recreation improvements and management. Even the prospect of a special designation could attract federal funding for recreation improvements and management.

Not recognizing a recreation ORV for the Middle Fork is an example of why the federal government is working to improve equity in providing federal services. For example, President Biden signed Executive Order 13985 in January 2021 to establish as a [ldquo][hellip]policy of my Administration that the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.[rdquo] A liberal interpretation of this equity policy would mean that locals who come to swim, fish, or simply relax next to their backyard river should have the same standing as out of region visitors who have the resources to drive to distant rivers and recreate upon them with expensive outdoor equipment.

Given the consistent failure of the Forest Service to recognize heavily used river-based recreation sites popular with nearby low-income communities of color, it is the responsibility of the agency to ensure that it provides equitable services [ndash] this includes protecting a local river that provides joy and relief to many nearby residents. The Middle Fork[rsquo]s outstanding day use recreation value to local communities should be considered outstandingly remarkable.

Whitewater kayaking on the Middle Fork is not considered outstanding because it attracts a [ldquo]small number[rdquo] of kayakers. Although a few of these kayakers may be local, most are likely from out of the region. There is no number threshold attached to the [ldquo]attracts visitors from beyond the region[rdquo] criteria. Although the Forest Service may not know how many boaters kayak the Middle Fork, it is clear from the sheer number of video reports available on the internet, that it is probably more than the Forest Service thinks. Furthermore, a river systems approach would consider the range of outstanding recreation provided by all eligible segments of the Tule, including popular hiking trails and campgrounds in and near Giant Sequoia groves, water slides and pools that attract visitors from beyond the region (based again on internet reports), day use sites that attract many local residents seeking respite from the summer heat, and expert kayakers who come to explore a little known whitewater run. We believe these different uses on various segments of the Tule represents in combination, a recreation ORV that includes the MF Tule.

Suggested Resolution: Recognize popular day use recreation and whitewater boating on the MF Tule as a recreation ORV.

NF Kern Tributaries [ndash] Fish ORVs for Salmon, Bull Run, Alder, and Peppermint Creeks

CalWild appreciates the river systems approach used for the WSR inventory in the 2022 Sequoia Plan/FEIS. It resulted in the identification of numerous tributaries of the Little Kern River and the NF Kern River as providing crucial habitat and supporting important populations of Little Kern golden trout and Kern River rainbow trout (KRRT). For NF Kern tributaries, this included CDFW[rsquo]s priority list to replace sterile non-native hatchery trout with native KRRT in Nobe Young Creek, Bone Creek, Dry Meadow Creek, and Brush Creek. In response to CalWild[rsquo]s and other comments, two other NF tributaries have been added [ndash] Rattlesnake Creek and Osa Creek.

We recommend adding a few other tributaries known to support native KRRT but that may not currently be part of CDFW[rsquo]s restoration priorities, including Salmon Creek, Bull Run Creek, Alder Creek, and upper Peppermint Creek. The Southern Sierra Fly Fishers believe that Salmon, Bull Run, Alder Creek, and perhaps upper Peppermint Creek [ldquo]just to name a few[rdquo] are home to KRRT.[17] This complies with CDFW[rsquo]s intent to [ldquo]preserve, enhance, and protect native fishes and their habitats[rdquo] in the NF Kern watershed.

Suggested Resolution: Recognize that all these tributaries contribute to the NF Kern[rsquo]s [ldquo]good[rdquo]

biotic integrity. Add a fish ORV (KRRT) to the already eligible segments of Bull Run, Salmon, and Alder Creeks and determine Peppermint Creek to be eligible due to its fish ORV.

Classification Issues [ndash] Salmon Creek & Freeman Creek

The segment of upper Salmon Creek, east and upstream of the motorized Cannell Meadow National Recreation Trail is in the Woodpecker Inventoried Roadless Area, which is proposed as wilderness under Alternatives C and E. The segment of Freeman Creek upstream of Road 20S78 and the President George Bush Giant Sequoia is located in an uninventoried roadless area proposed as wilderness in Alternatives C and E.

Suggested Resolution: The upper segments of Salmon Creek and Freeman Creek are located in roadless areas and should be classified as Wild.

Lower Kern River & Tributaries [ndash] Greenhorn, Lucas, Stark, and MF Erskine Creeks

Kern River (2.104.4)

The segment of the lower Kern River between Borel Powerhouse and Democrat Hot Springs Reservoir is southern California[rsquo]s whitewater boating river [ndash] it is the literally the closest reliably boatable whitewater river for millions of residents of the south state. The 1988 Sequoia Forest Plan found this segment to possess outstanding scenery and recreation due to the river[rsquo]s proximity to population centers, diversity of recreation opportunities, and the contrast of the canyon with the adjacent valley.[18] This was acknowledged in the 2016 draft plan/DEIS and expounded further upon in the 2019 revised draft plan/DEIS. In addition to popular developed campgrounds at Hobo and Sandy Flat, outfitter campsites operated under special use permits, and the popular day use and river access sites at Miracle Hot Springs, Democrat and Delonega, this segment of the Kern supports private and commercial whitewater boating opportunities that [ldquo]attract visitors from outside of the region of comparison and are of exceptional quality.[rdquo][19]

The 2022 FEIS confirms these qualities and then inexplicably states that [ldquo]Recreation is not an outstandingly remarkable value.[rdquo][20] We assume this is a cut and paste typographical error. If not, the Forest Service needs to explain this reversal.

Suggested Resolution: Reinstate the Recreation ORV for Kern River segment 2.104.4.

Kern River (2.104.6)

The segment of the lower Kern between Democrat Dam and SCE[rsquo]s Kern River 1 Project diversion was originally considered ineligible in the 1988 Sequoia Plan. In an appeal settlement agreement, the Forest Service agreed that the segment was eligible due to its Scenery and Recreation ORVs. Sequoia Forest Supervisor Sandra Key noted that this segment [ldquo]provides river oriented recreation year-round and respite from the hot valley to the west [ndash] a recreation ORV.[rdquo][21]

In conjunction with eligible upstream segments, this reach of the lower Kern represents a continuum of diverse recreation opportunities that should be recognized as an Recreation ORV. This segment offers three distinct whitewater boating runs, including the class V Cadilacs section, the class III-IV Rich Bar section, and the world famous class V Cataracts run.[22] The Forest Service[rsquo]s own promotional materials to the public for the Kern River confirms this: [ldquo]Below Democract you[rsquo]ll find numerous class V+ rapids, with a short area of class II and III near Richbar.[rdquo][23]

Whitewater boating in these more technical segments of the lower Kern is discounted in the eligibility analysis, which notes that [ldquo]A few highly experienced whitewter enthusiasts enjoy the challenge of kayaking this segment.[rdquo] It should be recognized by the Forest Service that agency guidelines do not place a threshold on the number of visitors that are attracted from beyond or throughout the region (the basic eligibility criteria for Recreation ORVs). The fact that only a few of the world[rsquo]s top expert kayakers can run the Cataracts is most certainly a unique and rare recreation value.

The challenging Cataracts run is recognized world-wide. Sierra South considers the [ldquo]world famous[rdquo] Cataract run to be [ldquo]one of the pinnacles of whitewater kayaking.[rdquo][24] The internet is replete with videos of the [ldquo]few[rdquo] kayakers who challenge this run. For example:

https://www.facebook.com/watch/?v=1373367166059965

https://www.facebook.com/watch/?v=1373367166059965

https://www.youtube.com/watch?v=X2_jpl9Nun8

This segment of the Kern also provides crucial recreation opportunities for non-whitewater boaters. As the eligibility inventory notes, the segment is immediately adjacent to Highway 178, there are innumerable turnouts and three developed recreation sites where visitors stop to picnic, fish, and enjoy the water, and the segment is close to the Bakersfield area which draws crowds during the hot, summer season. Whitewater boating and family-oriented day use recreation on this segment represents a continuum of varied recreational opportunities that make the other segments of the lower Kern eligible.

The practical impact of the Forest Service[rsquo]s focus on rivers attracting recreation visitors from outside the region is the exclusion of popular day use sites heavily used during the summer season by residents of local communities, which are often low income and communities of color. This is a consistent problem with WSR inventories under the current guidelines. Under President Biden[rsquo]s Executive Order 13985, it is the responsibility of the agency to ensure that it provides equitable services [ndash] this includes protecting a local river that provides joy and relief to many nearby residents. The lower Kern[rsquo]s (2.104.6) outstanding day use recreation value to local communities should be considered outstandingly remarkable.

Suggested Solution: Recognize Kern River segment 2.104.6 as providing diverse recreation opportunities (expert whitewater boating, family day use recreation) that attract visitors from throughout and beyond the region.

Greenhorn Creek [ndash]

The administrative record fails to support the claim that Greenhorn Creek does not possess a Recreation ORV associated with spelunking in Greenhorn Creek Cave. The narrative states that the cave is [ldquo]well known[rdquo] to spelunkers locally and regionally, but recreation is not considered a unique or exemplary recreation experience. The same narrative then describes the outstanding geology value of Greenhorn Creek Cave: [ldquo]The entire creek disappears and flows underground before reemerging downstream, this deep cave system is developed in granite bedrock, which is highly unusual (almost all caves in the Sierra Nevada are formed marble), and Greenhorn Cave is potentially the deepest granite cave in the United States.[rdquo] The inventory confirms that this comprises a geology ORV for Greenhorn Creek.

Given this description, spelunking in Greenhorn Cave should also be considered a unique or rare recreational experience in an outstanding geological setting. The only other granite cave in California with a stream flowing through it of which we are aware of is Millerton Caves on the San Joaquin River Gorge. That cave system is threatened with flooding by the proposed Temperance Flat dam and reservoir. Given the region of comparison for recreation values is the southern California Counties of Los Angeles, Ventura, San Diego and the Central Valley/Sierra Nevada counties of Kern and Tulare, visitors to Greenhorn Cave must be attracted from throughout the region and beyond.

Suggested Resolution: Recognize a Recreation ORV for spelunking in the unique Greenhorn Creek Cave.

Classification Issues [ndash] Greenhorn Creek, Lucas Creek, Stark Creek, MF Erskine Creek [ndash]

Much of the middle segment of Greenhorn Creek flows through the Greenhorn Creek Inventoried Roadless Area and portions of the eligible segments of Lucas Creek and Stark Creek flow through the Mill Creek Inventoried

Roadless Area. It appears that a portion of the MF Erskine Creek is located in the Woolstaff Inventoried Roadless Area, upstream from the existing motorized route/trail (3E24) which appears to cross the creek on private land.

Suggested Resolution: Classify the appropriate segments of Greenhorn, Lucas, Stark, and MF Erskine Creeks in inventoried roadless areas as Wild.

South Fork Kern Tributaries [ndash] Trout, Fish, and Lost Creeks [ndash]

CalWild appreciates the river systems approach with the WSR inventory in the 2022 Sequoia Plan/FEIS, which identifies key tributaries of the SF Kern that provide important habitat for California golden trout. We also appreciate that the Forest Service has appropriately revised the proposed classification for Trout, Fish, and Lost Creeks within the existing South Sierra and Domeland Wilderness areas as Wild.

Wilderness Recommendations

Out of a final 841,700-acre inventory of wilderness quality lands, it is truly disappointing that the Final Plans include in the preferred alternative only one wilderness recommendation [ndash] a modest 4,906-acre addition to the Monarch Wilderness on the Sequoia Forest. No wilderness was recommended on the Sierra Forest.

CalWild and others spent considerable effort reviewing potential wilderness boundaries for possible conflicts with non-wilderness uses and consulting with stakeholders in local communities. Consequently, we identified our top wilderness recommendations for both Forests with boundary adjustments. But we can find no evidence in the Final Plans/FEIS that our boundary adjustments were ever considered. Indeed, the Forest Service hasn[rsquo]t taken the time to fix a boundary error that we have been pointing out since December 2015 [ndash] the clearly mistaken inclusion of the motorized Cannell Meadow National Recreation Trail within the roadless area boundary for what became the Domeland West Wilderness Addition under Alt. C.

We recall that a Forest Service official at the first public meeting for the planning process in Clovis, CA, shared his opinion that the Sierra Forest already had [ldquo]enough[rdquo] wilderness. It is understandable that many public members don[rsquo]t believe that public comments make a difference when presented with this pre-decisional bias. However, CalWild does believe that substantive and detailed comments based on science and on the ground reality can make a qualitative difference in the seeming intractable debate about wilderness.

We avoided getting involved in debates about how much wilderness is enough or whether wilderness limits fuels work and increase wildfire danger. We are committed to encouraging the Forest Service to always use the

minimum tool test [ndash] whether it is to determine how to treat wildfire fuels in wilderness without harming its roadless qualities or how to maintain trails in wilderness with limited funds and personnel. Reasonable people can always find ways to solve these problems.

CalWild concentrated on fixing the problems we could fix, like adjusting boundaries to avoid existing roads and development, legal mountain bike and motorized trails, and popular rock climbing areas with fixed safety routes. To accomplish this, we consulted with local residents and trail users, as well as with organized interests such as the Outdoor Alliance, and we conducted targeted field work. As a result, we compiled a list of 10 potential recommended wilderness areas that include a wide range of ecosystems and primitive outdoor recreation opportunities and avoids conflicts with non-wilderness uses.

High Priority Wilderness Recommendations: Sierra and Sequoia Forest Plans

Devil Gulch-Ferguson Ridge Wilderness (South Fork Merced River) [ndash] This 46,298-acre wilderness proposal on the Sierra Forest is one of the largest and undeveloped low elevation wild places in the Sierra Nevada. The South Fork Merced WSR flows through the proposed Wilderness and its roadless qualities help protect the river[rsquo]s biotic integrity and its state-designated Wild Trout Waters. Protection of the area would facilitate the migration of species in response to climate change from the Sierra foothills into Yosemite National Park. The area provides habitat for Pacific fisher, western pond turtle, California spotted owl, and great gray owl and it supports sensitive plants and a rare example of an undisturbed Ponderosa pine forest. Leading into the heart of the area, the Hite Cove Trail along the South Fork is a popular spring wildflower destination. Boundaries were adjusted to avoid existing roads, fuel breaks, motorized trails, and private inholdings. The boundaries are best represented in the Devil Gulch-Ferguson Ridge Recommended Wilderness Map for Alt. E.

Ansel Adams [ndash] Mt. Raymond Wilderness Addition [ndash] This 9,117-acre addition to the Ansel Adams Wilderness on the Sierra Forest is also directly adjacent to Yosemite National Park and encompasses the south bank of more than four miles of the South Fork Merced Wild and Scenic River. A primary purpose of this proposal is to protect the South Fork[rsquo]s biotic integrity, as well as the exposed underbelly of Yosemite National Park. Segments of Iron and Grizzly Creeks flow through the area into the South Fork. Old growth mixed conifer forests, meadows, streams and lake systems represent intact ecosystems that support California spotted owl, Yosemite toad and Sierra yellow-legged frog. Opportunities for solitude and primitive recreation abound, including the Iron Creek, Grizzly Creek, and Chiquito Pass Trails, which lead through the proposed wilderness to the South Fork and Yosemite Park. Boundaries were adjusted to avoid roads, motorized trails, and private inholdings. These boundaries are best represented in the Ansel Adams Mt. Raymond Additions 1 Alt. C map.

Bear Mountain Wilderness (Potential Dinkey Lakes Addition) [ndash] This 9,245-acre proposed wilderness on the Sierra Forest is adjacent to the existing Dinkey Lakes Wilderness but separated from the wilderness by a wide corridor that includes the Swamp OHV Route. Elevations range from 6,000 fee to the 9,526-foot-high peak of Bear Mountain. Forests and streams support significant habitat for Pacific fisher, American martin, northern goshawk, California spotted owl, Lahontan cutthroat trout, and Sierra Nevada yellow-legged frog. The area has an extensive area of glacially carved granite, including the magnificent Dinkey Dome, a favored destination of

rock climbers. Dinkey Creek, an eligible WSR, flows through this area, providing seasonal class V whitewater kayaking in a spectacular setting. Campgrounds in the nearby Dinkey Creek Recreation Area provide ideal basecamps to explore the Bear Mountain potential wilderness, and the Dinkey Creek eligible Wild and Scenic River. CalWild excluded all legal roads, motorized trails, and private inholdings from the wilderness proposal. This proposal is best reflected by the Bear Mountain Alt. C map.

Sycamore Springs [ndash] This 17,907-acre wilderness proposal on the Sierra Forest encompasses the lower segment of Dinkey Creek and the highly rugged and scenic Patterson Bluffs, Indian Rock, and Black Rock. The area includes ecosystems under-represented in the wilderness system and support numerous rare, threatened, and endangered species of wildlife and plants. Lower Dinkey Creek offers world class experts-only whitewater kayaking that attracts international boaters. The proposed wilderness would help protect the biotic integrity of Dinkey Creek, an eligible Wild and Scenic River. Rich in cultural and historical values, the area is of special interest to local Native Americans. Boundaries were adjusted by CalWild to avoid popular fixed climbing routes in the Patterson Bluffs and to exclude roads and powerlines. These adjusted boundaries are best reflected in the Sycamore Springs Recommended Wilderness maps for both Alt. C and E.

Monarch Wilderness Addition West (Kings River) [ndash] This 66,322-acre proposed wilderness addition to the existing Monarch Wilderness on the Sequoia and Sierra Forests would provide a protected corridor facilitating the migration of species in response to climate change from 1,000 feet elevation to 14,000 feet elevation. Encompassing the designated and eligible segments of the Kings Wild and Scenic River, the wilderness would help protect the biotic integrity of the river, its state-designated Wild Trout Waters, and its watershed. The area includes ecosystems under-represented in the wilderness system and supports Pacific fisher and other rare, threatened, and endangered wildlife and flora. Just a few of its outstanding recreation values include whitewater boating on the Kings River and hiking/backpacking on the Kings River National Recreation Trail. The Yucca Point Trail provides a short hike down to the magnificent confluence of the Middle and South Forks Kings Wild and Scenic Rivers. CalWild excluded roads and existing motorized trails in the Crabtree Hollow area. We did keep most of the former Verplank Trail in the proposed wilderness. Verplank is a motorcycle trail so overgrown and damaged by wildfire that it is virtually impassable and difficult to find. We are willing to discuss further boundary changes if needed. This proposal is best reflected in the Monarch Wilderness Addition Alt. C map (although this map excludes the Verplank Trail and much of the southwest corner of the roadless area).

Golden Trout Wilderness Addition (North Fork Kern River) [ndash] This 41,282-acre addition to the existing Golden Trout Wilderness on the Sequoia Forest encompasses the rugged canyon of the North Fork Kern Wild and Scenic River and several of the river[rsquo]s major tributaries. Providing habitat for the Pacific fisher, foothill yellow-legged frog, slender salamanders, and several rare plants, the area includes ecosystems under-represented in the wilderness system, including part of the Freeman Creek Giant Sequoia Grove. The President George H.W. Bush Giant Sequoia Tree is adjacent to the area. CalWild excluded all legal roads, most motorized trails, and fixed climbing routes at Hermit Rock. The popular Needles climbing area is avoided altogether. The northern segments of the Rincon and Rattlesnake Creek Trails leading to the existing wilderness boundary were included in the wilderness addition to discourage illegal entry, but the southern segments of these trails remain outside of the proposed wilderness and open to encourage use of loop routes with other trails. This is best reflected in the Golden Trout Addition Alt. E map.

Domeland Wilderness Addition West [ndash] This 26,697-acre addition to the existing Domeland Wilderness on the Sequoia Forest encompasses scenic Sirretta Peak and the source of Salmon Creek (an eligible WSR). The addition also includes the Twisselman Botanical Area, which is the only known location in the California where foxtail, limber, western white, Jeffrey, and lodgepole pine all occur. The area is the southern-most limit of several Sierra Nevada plant species, including foxtail pine. Adding this area to the Domeland Wilderness would improve and protect biological connectivity between the Kern Plateau and the lower elevation Kern River canyons. CalWild adjusted boundaries to avoid all legal roads and the Cannell Meadow National Recreation Trail (a popular motorcycle trail). The addition does include the Sirretta Peak Trail, which is currently open to motorcycle use even though the Forest Service promised to close the trail to motorized use in a legally binding settlement agreement in 1990. These adjustments are best reflected in the Domeland West Addition Alt. E map

Cannell Peak [ndash] The 30,910-acre proposed wilderness on the Sequoia Forest encompasses the east slopes of the rugged North Fork Kern Wild and Scenic River. It also includes segments of two North Fork tributaries eligible for WSR protection, Salmon and Brushy Creek. Salmon Creek tumbles over one of the highest waterfalls in the southern Sierra in the heart of the proposal and Brushy Creek is a popular whitewater kayak run. With elevations ranging from 3,000 to 9,500 feet, the area supports an incredible diversity of plants and animals and includes ecosystems under-represented in the wilderness system. Stands of endemic Piute cypress grow here and wet meadows on the edge of the Kern Plateau are home to the endangered mountain yellow-legged frog and several species of salamanders. The proposed wilderness would protect the high biotic integrity of the North Fork and provide important biological connectivity between the river and the higher elevation Kern Plateau. CalWild adjusted boundaries to ensure that the Rincon Trail and Cannell Meadows National Recreation Trail, which are popular motorcycle and mountain bike routes, are outside the proposed wilderness. Service roads, powerlines, and other facilities associated with the Kern River #3 Hydroelectric Project were also excluded. We also intended to exclude the network of [ldquo]Edison[rdquo] trails popular with mountain bikers in the southwest corner of the area but because these trails are not legal and cannot be found on official maps, there may be some overlap. This proposal is best represented in the Cannell Peak Alt. E map.

Stormy Canyon [ndash] This 32,000-acre proposed wilderness on the Sequoia Forest encompasses the west slopes of the rugged North Fork Kern Wild and Scenic River. It also includes Bull Run Creek (an eligible WSR) and several other tributaries flowing from the Greenhorn Mountains, which helps to protects the North Fork[rsquo]s high biotic integrity. The entire area provides a scenic backdrop to the thousands of people who recreate in and along the North Fork. With ecosystems underrepresented in the wilderness system, the area also provides important biological connectivity between the Kern Plateau, North Fork Kern, and the Greenhorn Mountains. The proposal includes part of the Baker Point Botanical Area, home to many [ldquo]rock-loving[rdquo] rare plants. CalWild adjusted the proposed wilderness boundaries to exclude popular mountain bike routes such as the Whiskey Flat, Tobias, and Baker[rsquo]s Point trails, as well as the upper Bull Run motorcycle trail. We recently became aware of a network of unofficial trails associated with the Whiskey Flat Trail in the vicinity of Stormy Canyon. We would be willing to exclude these trails if there is any official map depicting them. The historic Baker[rsquo]s Point lookout and communications site is also excluded. This proposal is best represented by the Stormy Canyon Alt. E map.

Suggested Resolution: Sit down with interested stakeholders to work out boundaries that meets most needs. Based on this effort, include revised proposals for recommended wilderness in the Final Plan and Record of Decision.

Alternative Protection of Roadless Areas

Recognizing the intense public interest in the protection of wild places, many of the first generation of forest plans proposed some level of administrative protection for roadless areas, For example, the 1991 Sierra Forest Plan allocated portions of the Devil Gulch-Ferguson Ridge, Mt. Raymond, and Dinkey Lakes Addition to non-regulated timber management to discourage future road building and logging. Although the 1988 Sequoia Forest Plan did not propose administrative protection of roadless areas, the legally binding 1990 Mediated Settlement Agreement allocated portions of several roadless areas on the Sequoia Forest to unregulated management to discourage road building and logging. Other Forest Plans went even further by administratively establishing semi-primitive backcountry areas where road building and commercial logging were prohibited.

In 2000, the Clinton Administration adopted the Roadless Area Conservation Rule (RACR) to protect inventoried roadless areas from road building and commercial logging. Logging is allowed under RACR but only if it is needed to protect roadless values. Unfortunately, only inventoried roadless areas identified in the 1979 RARE II process are protected under RACR [ndash] it does not apply to additional roadless lands identified in the forest planning process that are not already in the 1979 inventory.

Although the 2022 Sierra and Sequoia Plans acknowledge that 1979-era inventoried roadless areas will remain protect under RACR, the plans specifically state that they [ldquo]don[rsquo]t incorporate the Roadless Rule.[rdquo][25] What this means is that RACR protection will not apply to IRAs on the Sierra and Sequoia Forests if the RACR is overturned or weakened by a future administration.

Public interest in the protection of roadless areas remains high. Simply hoping that a future administration won[rsquo]t eliminate or weaken RACR protection is not enough. At the minimum, RACR protections should be specifically included as plan management direction [ndash] which means that they remain if the RACR is rescinded nationally and cannot be eliminated or changed except through a Forest Plan amendment.

Ideally, roadless areas should be protected administratively as backcountry areas where road building and logging are prohibited via specific plan management direction. But the programmatic focus of the Revised Forest Plans discourages on the ground management designations.

Suggested Resolution: Specifically adopt RACR protections as Forest Plan management direction or establish a system of Backcountry Areas that are off limits to road building and logging.

Attachment Next Page [ndash] Dinkey Creek: A Continuum of Outstanding Scenery

[1] Sequoia National Forest Plan Assessment, USDA Forest Service, Sep. 2013, pg. 205.

[2] Final Sierra National Forest Assessment, USDA Forest Service, (no date), pgs. 204-205.

[3] Sequoia Final Plan pg. 124, Sierra Final Plan pg. 122.

[4] FSH 1909.12-82.61[mdash]LAND MANAGEMENT PLANNING HANDBOOK CHAPTER 80[mdash]WILD AND SCENIC RIVERS.

[5] Biotic Integrity of Watersheds, Sierra Nevada Ecosystem Project (SNEP) Final Report, Vol. II, Chap. 34, P.B. Moyle and P.J. Randall, UC Davis, 1996.

[6] No explanation is provided in the 2019 Plan/RDEIS or the 2022 Plan/FEIS to explain why and how the great purge occurred. CalWild learned that it was largely the work of the Forest Supervisor in a phone conversation with Sierra Forest Recreation Officer Judi Tapia.

[7] FSH 1909.12, Chap. 80, sec. 82.73a(1).

[8] A Report on Indian Sites and Trails, Huntington Lake Region, California, by Margaret G. Hindes, undated but likely published in 1958 or later.

[9] Monitoring thermal springs to improve land management decision-making, Sierra Nevada, California, J.V. De Graff and A. Gallegos, Environmental and Engineering Geoscience, May 2018, pg. 169.

[10] http://lessons.jareddahlaldern.net/ConstitutionoftheNorthForkMonoTribe-1.pdf

[11] A Report on Indian Sites and Trails, Huntington Lake Region, California, Margaret Hindes, undated but post-1958.

[12] Sierra National Forest Land Resource Management Plan, USDA Forest Service, 1991, pg. 4-28.

[13] Native Sustainment: The North Fork Mono Tribe[rsquo]s Stories, History, and Teaching of Its Land and Water Tenure in 1918 and 2009, Jared Dahl Aldern, Prescott College Dissertation, May 2010, pg. 150.

[14] Sierra National Forest Land Resource Management Plan, USDA Forest Service, 1991, pg. 4-51.

[15] Nelder Grove of Giant Sequoias (fact sheet), USDA Forest Service, Jan. 2012.

[16] The narrative for the MF Tule eligibility on pg. C-99 of the 2022 Sequoia Final Plan FEIS Appendix C documents history/prehistory ORVs but clearly states that recreation is not an ORV. But the entry for the MF Tule in Appendix C Table C-1 listing eligible river segments and their ORVs on pg. C-11 lists a recreation ORV. We assume this is an error.

[17] https://ssffclub.org/proposals

[18] Sequoia National Forest Land and Resource Management Plan FEIS Appendix E, USDA Forest Service 1988, pg. E-29.

[19] Revised DEIS for Revision of the Sequoia and Sierra Forest Plans, Vol. 2 Appendix C, USDA Forest Service, June 2019, pg. C-60.

[20] Sequoia and Sierra Forest Plans FEIS Vol. 4, Appendix C, USDA Forest Service June 2022, pg. C-79.

[21] Memo from Sequoia Forest Supervisor Sandra H. Key to Regional Forester, April 21, 1994.

[22] https://cacreeks.com/kern-xxx.htm

[23] https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd616009.pdf

[24] https://www.sierrasouth.com/plan-your-trip-to-the-kern-river/kern-river-boaters-guide/

[25] Sequoia Forest Final Plan, USDA Forest Service, June 2022, pg. 126; Sierra Forest Final Plan, USDA Forest Service, June 2022, pg. 123.