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Comments: Objections to the Revised Sequoia National Forest Management Plan

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Sierra and Sequoia National Forests Plan Revision Objection

August 15, 2022

Dear Forest Supervisor Theresa Benson:

On Earth Day, President Biden signed an Executive Order strengthening America's forests, which are home to cherished expanses of mature and old growth forests on Federal lands and is critical to the health, prosperity, and resilience of our communities particularly in light of the threat of catastrophic wildfires. Not just the national forest system, but BLM and USFS lands are also included. "Globally, forests represent some of the most biodiverse parts of our planet and play an irreplaceable role in reaching net-zero greenhouse emissions. Terrestrial carbon sinks absorb around 30 percent of the carbon dioxide emitted by human activities each year. Here at home, America's forests absorb more than 10 percent of annual United States economy-wide greenhouse gas emissions. Conserving old-growth and mature forests on Federal lands while supporting and advancing climate-smart forestry and sustainable forest products is critical to protecting these and other ecosystem services provided by those forests." Recommending additional wilderness areas is the best way to guarantee durable protections for these important and fragile places.

The 2012 Planning Rule requires forests undergoing a plan revision to "identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System [NWPS] and determine whether to recommend any such lands for wilderness designation." 36 C.F.R. [sect] 219.7(c)(2)(v). Chapter 70 of the Forest Service Land Management Planning Handbook (FSH) 1909.12 prescribes a four-step process for doing so: (1) inventory all lands that may be suitable for inclusion in the NWPS based on their size, roadless nature, and lack of improvements that are substantially noticeable in the area as a whole; (2) evaluate the wilderness characteristics of each inventoried area pursuant to the criteria in the Wilderness Act of 1964; (3) analyze a range of alternatives for recommended wilderness in the plan EIS; and (4) decide which areas or portions of areas to recommend for inclusion in the NWPS. Chapter 70 requires opportunities for public participation "early and during each step of the process." FSH 1909.12, ch. 70, [sect] 70.61.

Given the many ecological and social benefits of wilderness and other highly protected lands, the wilderness recommendation process is a key component of satisfying the requirements of the 2012 planning rule. The overarching purpose of the rule is to provide for the development of plans that: Will guide management of National Forest System lands so that they are ecologically sustainable and contribute to social and economic sustainability; consist of ecosystems and watersheds with ecological integrity and diverse plant and animal communities; and have the capacity to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future.

I believe that the Final Record of Decision for the revised forest plan should include at least all areas in Alternative C for recommended wilderness, which proposes protection for 234,912 acres of new wilderness and additions, especially the Golden Trout addition, which includes lower elevation ecosystems that are rare in the wilderness system. Please reconsider these omissions for wilderness recommendation: Golden Trout Wilderness Addition (North Fork Kern River), Domeland Wilderness Addition West, Cannell Peak, and Stormy Canyon.

In September 2019 I made the following comment on the Draft Sequoia National Forest Plan regarding wilderness recommendations: It is alarming to see that the Forest Service has failed to provide any meaningful wilderness recommendations for the Sequoia National Forest. I truly appreciate the recommendation to add 4,906 acres to the Monarch Wilderness east of Kennedy Meadows but this is less than 1% of the forest's 535,554 total roadless acres and would allow twice the current logging in the Sequoia National Forest. The revised plan fails to recommend wilderness protection for the 56,356-acre Golden Trout Wilderness addition which encompasses the deep canyon of the Wild and Scenic North Fork of the Kern River. The plan also overlooks important additions to Domeland and the South Sierra Wilderness. New areas such as Cannell Peak, Dennison Peak and Stormy Canyon near Kernville, and a potential addition to the Bright Star Wilderness in the desert-like Piute Mountains have also been overlooked.

The Golden Trout Wilderness Addition (North Fork Kern River), a 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'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.

The Domeland Wilderness Addition West, a 26,697-acre addition to the existing Domeland Wilderness in 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 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.

Cannell Peak, the 30,910-acre proposed wilderness in 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 provides important biological connectivity between the river and the higher elevation Kern Plateau.

Stormy Canyon, the 32,000-acre proposed wilderness in 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 protect the North Fork's high biotic integrity. The entire area provides a scenic backdrop to the thousands of people who recreate in and along the North Fork Kern. 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 rare plants.

Please consider working with interested stakeholders to determine wilderness boundaries that meet most needs. Based on this effort, include revised proposals for recommended wilderness in the Final Plan and Record of Decision. Public interest in the protection of roadless areas remains high. Simply hoping that an administration won't eliminate or weaken Roadless Area Conservation Rule protection is not enough. At the minimum, RACR protections should be specifically included as plan management direction 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. But the programmatic focus of the Revised Forest Plans discourages on the ground management designations.

In September 2019 I made the following comment on the Draft Sequoia National Forest Plan regarding Wild and Scenic Rivers: Thank you for improving the eligible inventory of wild and scenic rivers from an incomplete 1990s inventory of 75 miles of eligible rivers to 341 miles, with several tributaries of the North and South Forks Kern River and the Kings River deemed eligible. Rattlesnake and Osa Creeks should also be found eligible as these two North Fork Kern tributaries were identified by the California Dept. of Fish and Wildlife as supporting remnant populations of the native Kern River rainbow trout which is an outstanding fishery value. Due to its outstanding Giant Sequoia groves and diverse recreation, I also urge you to complete the Tule River system by finding all of the North Fork and Middle Fork Tule River to be eligible. By doing so you will be connecting this river with eligible segments of the Middle Fork Tule River and its South Fork.

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.

I appreciate that the 2022 FEIS Appendix C now cites biotic integrity as a factor in several WSR eligibility findings, including Little Kern Lake Creek, Osa Creek, Rattlesnake Creek, Brush Creek, Dry Meadow Creek, Fish Creek, and Freeman Creek in the Sequoia Forest. I also appreciate 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, I disagree that the only ORVs for the Middle Fork from the North/South Forks confluence to the Forest Boundary is history/prehistory. 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 "a small number" of kayakers capable of safely navigating the river.

The Forest Service'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. 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.

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, 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. I believe these

different uses on various segments of the Tule represents in combination, a recreation ORV that includes the MF Tule River. Please recognize popular day use recreation and whitewater boating on the MF Tule as a recreation ORV.

I stated in my September 2019 comments the following: eliminate grazing from degraded meadows that support at-risk amphibian species. According to the FEIS WTR-RCA-GDL 06: To improve water quality or habitat for aquatic and riparian-dependent species, evaluate the impacts of facilities on riparian conservation areas when reissuing permits for livestock. If significant adverse impacts are found, existing livestock facilities should be relocated outside of wetlands and riparian areas or mitigated. There is no mention of the potential for impacts from trampling in riparian conservation areas as a result of livestock gathering or the repeated, year-after-year impacts from trampling, compaction, and the generation of waste. There are no criteria in the guideline for what constitutes a significant adverse impact on a riparian conservation area.

To protect sensitive riparian resources and habitat from trampling and damage please add a standard that states "Locate new facilities for gathering livestock and pack stock outside of meadows and riparian conservation areas:" and adopt the following revised standard using the convention in other standards to apply to "adverse impacts": To improve water quality or habitat for aquatic and riparian-dependent species, evaluate the impacts of facilities on riparian conservation areas when reissuing permits for livestock. If adverse impacts are found, existing livestock facilities should be relocated outside of wetlands and riparian areas or mitigated.

Thank you for giving me the opportunity to provide my objections to the Revised Sierra National Forest Management Plan.

JoAnne Clarke