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Alfred Watson  
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U.S. Forest Service  
Kern River Ranger District  
Sequoia National Forest  
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Dear Mr. Watson:

**Re: BRUCE HAFENFELD RANGE USE FACILITIES (BUILDING AND ROAD) SUP  
(Scoping)**

**Expected Analysis Type**

Decision Memo

**Categorical Exclusion**

Issuance of a new special use authorization for a new term to replace an existing or expired special use authorization when the only changes are administrative, there are no changes to the authorized facilities or increases in the scope or intensity of authorized activities, and the applicant or holder is in full compliance with the terms and conditions of the special use authorization.

**Location**

Near Big Meadow on the Kern River Ranger District of the Sequoia National Forest in Tulare County

**Forest**

Sequoia National Forest

**District**

Kern River Ranger District

**State**

California

**County**

Tulare

**Legal Land Description**

1 acre in NE  $\frac{1}{4}$ , Section 32, T23S, R34E, MDB&M

Thank you for the opportunity to comment on this project. I am participating only because I was on the paper mailing list for all projects. I note that the web site for this project has not posted any documents on this project, so the general public not on the mailing list has not been fully informed about this project and thus the Forest Service has failed to provide the general public with information for commenting.

[http://www.fs.fed.us/nepa/nepa\\_project\\_exp.php?project=40085](http://www.fs.fed.us/nepa/nepa_project_exp.php?project=40085)

**The road and use of the road could be causing “significant” adverse effects to the meadow could be considered an extraordinary circumstance.** The Forest Service should consider the cumulative impacts to the meadow prior to reissue and should hold a field trip to the road and the meadow for concerned citizens. Please keep me on the list for any and all communications on this project.

Conduct Road-Specific and Cumulative Effects Analysis of Roads on the Objects of Interest:

- Analyze impacts of the road prism on hydrological features (including subsurface flows) important to giant sequoia and obliterate roads that jeopardize hydrological continuity essential to grove sustainability.
- Complete a monument-specific TAP following Forest Service directives and recommendations provided by The Wildlife Society and Wildlands CPR.
- Reduce road densities in the monument based on the minimum necessary road network needed to better balance the monument’s access vs. protection mandates.
- Evaluate and prioritize a range of road closure methods (seasonal closures, decommissioning), including costs and benefits to the objects of interest.

Conduct cumulative effects analysis of contribution of roads on human-caused fire ignitions and fire behavior.

#### ROAD concerns

In forested ecosystems, roads result in cumulative impacts (i.e., chronic disturbances), which when combined with other anthropogenic disturbances, reduce habitat suitability for many species (special feature on roads in *Conservation Biology* 2000 Volume 14 and Trombulak and Frissell 2000). Wilcove et al. (1998) suggested that “roads are the single greatest impact to the movement of sensitive species” and Forman and Hesperger (1996) concluded “roads cause more effects and have a greater cumulative effect than vehicles” (emphasis added). In particular, the ecological effect of roads is much larger than the area cleared for roads, extending a ¼ mile out on either side of a road (Forman and Hesperger 1996, Forman and Alexander 1998). The Forest Service in its TAP for the monument should analyze the road impact zone.

In summary, road density (e.g., mi/mi<sup>2</sup>) is a useful index of road-related impacts because it integrates many ecological effects of roads and vehicles on flows and movements of wildlife across the landscape. In addition, the ratio of road density to stream density and intersection of roads with stream crossings are important indicators of the functionality of hydrological processes and particulate matter flows (Coe 2006). Because roads both remove wildlife habitat directly and dissect the remaining natural patches into residual small patches, they are a significant contributor to habitat fragmentation (Reed et al. 1996). Obviously, while roads per-se do not kill wildlife or start forest fires, they are

associated (i.e., an indicator) with many types of human-caused changes in landscape dynamics and wildlife dispersal that can accumulate over a given area. The Forest Service would do well to include this type of review in its monument TAP as best science on road impacts. In addition, it should provide detailed monitoring on effects of road closures and obliteration on objects of interest as studies have shown road decommissioning/obliteration has net benefits to aquatic and terrestrial ecosystems (see <http://www.wildlandscpr.org/road-riporter/road-reclamation-measuring-success>).

**The Forest has failed to determine the minimum transportation system for Sequoia National Forest**, and as such, this SIP should not be continued until the minimum transportation system has been determined for Sequoia National Forest.

Under a Subpart of the Travel Management regulations; there must be a comprehensive, broad-scale, science-based analysis of NFTS routes to determine whether the transportation system designated for motor vehicle use meets resource and other management objectives adopted in the Forest Plan meets applicable statutory and regulatory requirements, reflects long-term funding expectations, minimizes conflicts among forest visitors, and minimizes adverse environmental impacts.

The Forest is arbitrarily limiting the scope of the planning effort to fit what appears to be a pre-determined outcome. The agency has made proposals and is considering comments from the public related to b) changing the class of vehicles that are allowed on existing NFTS routes, c) repairing NFTS routes, and d) opening currently closed NFTS routes.

The Forest must provide adequate or reliable documentation for what they consider to be the “baseline” of the current transportation system. The Forest has not provided Decision Notices, Records of Decision (ROD), National Environmental Policy Act (NEPA) documentation, Road Management Objectives, or funding allocation data for putative system routes in its jurisdiction. And the Forest must provide convincing evidence that the routes designed to be enlarged were originally designated for that width and have been open for long-term, public motorized recreation since 15 April 2000, when the Proclamation was made to protect the Monument, to require a Management Plan and a Transportation Plan, and to prevent roadbuilding.

There is no opportunity to view the project because the roads are closed due to snow. The requirement for full disclosure has not been met, since the 30-day comments period ends on 7 December 2012, and snow prohibits public access to the project area to consider actual evidence in the forest. Please schedule a field trip after the snow has melted so we can exchange views on the project in the field

This BRUCE HAFENFELD RANGE USE FACILITIES (BUILDING AND ROAD) SUP proposes to approve this SUP... with no Sequoia-wide Transportation Plan and no analysis for the Minimum Transportation System. The Forest Service should not be putting the cart before the horse in approving the use of old logging roads before the Travel Management Plan has been developed.

Please keep me on the mailing list and email list for any and all combinations on this and all other projects in the Kern River Ranger District

Ara

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