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Sent to:

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Subject: Travel Analysis Process Comments for Sequoia ForestKeeper & Sierra Club

Sequoia ForestKeeper (SFK) and the Kern Kaweah Chapter of the Sierra Club (SC) thank you for the opportunity to comment on the Subpart A Travel Analysis Process. Please consider these comments.

Like the other nine participants on the September 10, 2013 Webinar Call, we believe that 10 days is not enough time for the public to provide informed comments regarding the Subpart A Travel Analysis Process, which is meant to (1) determine the minimum road system for the entire Sequoia National Forest, and (2) determine which roads should be identified for closure. *See* 36 C.F.R. § 212.xx(x). We request additional time, so we can identify roads that we believe are unnecessary and that should be closed, restored, or converted to trails, especially those that were built initially in support of logging in giant sequoia groves.

Furthermore, we believe the Feedback Form is not appropriate for this process. The form appears to be designed to solicit comments in support of keeping roads open. This is contrary to the purposes of the Subpart A process, which should be geared toward identifying roads to be closed, obliterated, or converted to trails. Given the statements on the Webinar Call, we are also troubled that the forest is biased against closing and obliterating roads because, as stated on the call, if there were questions about the status of any road, the ID Team decided to err in the favor of access. Given the massive maintenance backlog and the known environmental risks to watersheds and water quality from road systems, we believe the Forest Service should, instead, err in the favor of closure and then justify and present data for keeping a road open.

ISSUES and COMMENTS

1. Road Segments Should be Separately Analyzed by (a) Maintenance Level and (b) the Point where the Segment Ends as a Spur

a. By Maintenance Level

Thank you for providing us with the spreadsheet titled SQF_II_Road_Core_02192013.xlsx, which includes all of the road segments broken down by Maintenance Level (ML). That

spreadsheet includes 1795 road segment entries, whereas the spreadsheet provided to the public (SQF_RoadsRiskBenefitsOpportunities_Summary090913) includes 1512 entries. The difference of 283 entries represents the segments where road segments include sub-segments with different maintenance levels. We think these differences in ML, which represent a significantly different economic commitment for each road sub-segment, should be considered in the final analysis, including whether some ML-2 roads should not instead be re-designated as ML-1 roads. Given that there are only 283 additional entries, it would make sense, therefore, to include a ML column in the Road Risk, Benefits and Opportunities Summary table, which will provide additional insight in how to approach the analysis.

b. Road Segments with End Spurs that have the same Road Number that Terminate at Protected Resource Areas (Wilderness & Roadless Areas)

We believe there are a number of road segments with end spurs, which, even though they have the same road number, should be analyzed separately. On the call, we suggested that there are a limited number of such end-spurs that need to be analyzed—those that terminate near a Wilderness or Roadless Area boundary. The following example illustrates the issue. The table on the next two pages represent our understanding of the remaining roads we believe should have their end-spur analyzed separately.

Example: 20S53 on the Western Divide RD

20S53 terminates at the boundary of the Golden Trout Wilderness. Before you reach the end-spur of 20S53, another road turns off to the left (20S64), which is also used as the main access route to the Clicks Creek Trailhead (20S64B). The end-spur segment of 20S53, starting at the turn-off of 20S64, does not seem to have any discernible purpose for recreation or resource management. While the recreation map of the Sequoia NF erroneously puts the Clicks Creek Trailhead at the end of 20S53, there is no trailhead there, but only a turn-around without any evidence of campsites or any other recreation use at that location. Based on my recent conversation with District Ranger Rick Stevens, there do not appear to be any plans for vegetation management in the area. The road also appears to be more of a user-created road that has not been engineered and does not include deep road-cuts, making it an easy-to-restore road and a good candidate for closure—it lacks a purpose and would be easy to restore/decommission.

In the Risk-Benefits-Opportunities table, the end-spur of 20S53 has not been broken out separately. Instead of identifying that end-spur for consideration of “Reduced Maintenance Level, Closure, Conversion or Decommission” (red), the table and map suggest that the entire segment should be “Prioritize[d] for Maintenance with Available Funding” (light green) with no regard to the difference in use of the end-spur. This makes no sense, and even Rick Stevens agreed with me on that point. At the very least this end-spur segment should be analyzed separately, it should probably be identified as a candidate for reduction in ML from ML-2 to ML-1, and it should also be considered for decommissioning. Given the risk that any open road is a potential source of fire ignition, it makes sense to consider this “road-to-nowhere” end-spur as a separate road segment, just like the nearby segments that are shown in red: 20S63 and 20S68, both of which are ML-2 and terminate at or near the Golden Trout Wilderness boundary.

For all these end-spur road segments, the “should be red” recommendations in the table below represents a suggestion that the Forest Service needs to revisit ALL the Evaluation Criteria for these end-spur segments separately. Moreover, SFK & SC suggest that the Forest Service should specifically change the Social Factors of **Lifestyle, Attitudes, Beliefs & Values** to a level of “6,” the **Private/Non-recreation Public Access** value to a level of “6,” and the **Public Access (Recreation)** value level to “3.” We have provided the Exhibit A Spreadsheet for that purpose.

Other Road Segments with End-Spurs that should be Analyzed Separately

Southern Section Map

End-Spur of	Starts at	Terminates near	ML	Current Opportunity	But Should be
20S50	20S50D	Golden Trout Wild.	2	light green	red*
20S67	ML-1 seg.	Golden Trout Wild.	1?	light green	red
22S82	22S82B	Golden Trout Wild.	3?	light green	red
20S31	20S31A	Golden Trout Wild.	3	light green	red
20S18	20S18A	Golden Trout Wild.	2	light green	red
20S25	20S25A	Golden Trout Wild.	3	light green	red
21S42	21S42A	Golden Trout Wild.	2	light green	red
21S27	22S27A	Slate Mtn. Roadless	2	light green	red
22S63	22S63A	Slate Mtn. Roadless	2	green	red
21S09	21S09A	Dennison Peak Rdless	2	light green	red
21S12	21S25	Black Mtn. Roadless	2	light green	red
23S02	21S02A	Lyon Ridge Roadless	1?	green	red
21S60	33E21	Rincon Roadless	2	light green	red
21S36	20S39	South Sierra Roadless	3	light green	red
(20S39)	(21S36)	South Sierra Roadless	3	light green	red
21S01	21S37	South Sierra Wild.	3	light green	red
21S32	21S32D-A?	Domeland Wild.	3	light green	red
22S07	22S07A	Domeland Wild.	1	light green	red
24S13	24S42	Domeland Wild.	3	light green	red
24S14	24S25	Domeland Wild.	2	light green	red
24S12	24S12D	Cannell Roadless	3	light green	red
24S56	24S56C	Cannell Roadless	2	light green	red
22S12	25S18	Cannell Roadless	1?	light green	red
24S39	24S39D	Cannell Roadless	2	light green	red
28S24	28S24D	Woolstaff Roadless	2	light green	red
28S27	28S25	Woolstaff Roadless	2	light green	red
28S04	28S04A	Cypress Roadless	1	light green	red
28S08	28S08A	Mill Creek Roadless	2	light green	red
26S24	26S04	Greenhorn Cr. Rdless.	2	light green	red
25S36	25S39	Chico Roadless	1	light green	red

* Denotes the **Lifestyle, Attitudes, Beliefs & Values** to a level of “6,” the **Private/Non-recreation Public Access** value to a level of “6,” and the **Public Access (Recreation)** value level to “3,” resulting in a corresponding “red” opportunity level.

Northern Section Map (Hume District)

End-Spur of	Starts at	Terminates near	ML	Current Opportunity	But Should be
12S19	13S94	Oat Mtn. Roadless	3	light green	red*
12S02	12S02A	KRSMA Roadless**	2	light green	red
13S03	13S66	KRSMA Roadless	2	light green	red
13S55	13S55D	KRSMA Roadless	1?	light green	red
13S50	13S07	KRSMA Roadless	2	light green	red
(13S07)	(13S50)	KRSMA Roadless	2	light green	red
13S06	Rdless Bdr.	Agnew Roadless	2	light green	red
13S26	13S44	Agnew Roadless	3	light green	red
13S87	13S87A	Agnew Roadless	2	light green	red
14S11	Last inhold.	Agnew Roadless	2	light green	red
13S14	13S14A	Jennie Lakes Wild.	3	light green	red
14S16	14S16A	Jennie Lakes Wild.	2	light green	red
14S03	14S03A	Jennie Lakes Wild.	2	green	red
14S18	14S15	Jennie Lakes Wild.	3	light green	red

* Denotes the **Lifestyle, Attitudes, Beliefs & Values** to a level of “6,” the **Private/Non-recreation Public Access** value to a level of “6,” and the **Public Access (Recreation)** value level to “3,” resulting in a corresponding “red” opportunity level.

** The Kings River Special Management Area (KRSMA) includes the Kings River Roadless Area.

2. Other Roads That We Think Should Eventually Be Considered for Reduction of Maintenance Level, Closure, Conversion or Decommission (red)

Roads Built in the Black Mountain Giant Sequoia Grove to Support the Solo Timber Sale

We have a tentative agreement with the Western Divide RD to convert the road network that supported an old timber sale in the Black Mountain Giant Sequoia Grove to trails after implementation of the Tule River Reservation Protection Project. Therefore, we request that the following roads be identified in “red” on the opportunity maps and that the tables be changed to reflect the Social Factors of **Lifestyle, Attitudes, Beliefs & Values** to a level of “6,” the **Private/Non-recreation Public Access** value to a level of “6,” and the **Public Access (Recreation)** value level to “3.” We support the “red” identification for 21S25D on the map.

FS Road Number	Road Name	Private / Public (non recreation)	Recreation Access	Attitudes, Beliefs, Values
21S25	LONG CANYON	6	3	6
21S25A	LONG CANYON	6	3	6
21S25B	LONG CANYON	6	3	6

21S25C	LONG CANYON	6	3	6
21S25D	LONG CANYON	6	3	6

Other Road Segments in Giant Sequoia Groves Built to Support Past Timber Sales

Similar road decommissioning and/or conversions to trails should eventually occur in any giant sequoia grove where logging has taken place in the past and roads were built in support of a timber sale on both the Hume Lake and Western Divide RDs. This policy should be based on the agreement reached in the Mediated Settlement Agreement (MSA), as stipulated, which states:

f. Regeneration of Cut-Over Sequoia Groves

- (1) *The objectives of regenerating cutover Giant Sequoia Groves will be to restore these areas, as nearly as possible, to the former natural forest condition.*
- (2) *The Forest shall implement the regeneration plan required by the Stipulation for Entry of Judgment dated 12/27/89, in Sierra Club v. U.S. Forest Service, Case No. CVF-87-263 EDP.*

MSA, p. 27. As we stated before, and we believe is the correct interpretation, restoring cut-over giant sequoia groves “as nearly as possible, to the former natural forest conditions” necessarily requires roads built in support of logging in these groves to be closed and decommissioned. We would, however, accept converting these roads to trails.

Unfortunately, we have been unable to pull together the names of the giant sequoia groves, the timber sales, and the associated road numbers due to the unreasonably short timeframe provided for this process and the fact that some of this data is decades old and only in the possession of one or two of our members who were not available to assist in this effort at this time.

REQUEST: Therefore, we request that the Sequoia National Forest either provide us with additional time to pull together this information while the TAP moves forward or, alternatively, we request that the Sequoia National Forest, whose silviculturists or timber staff likely have this same data (probably in a GIS database), pull out their data about the giant sequoia groves, the timber sales, and the associated road numbers for the Subpart A process, since it is likely more accurate than the data that SFK and SC members possess in their historical records.

For the sake of providing input to this process for roads built in groves as a result of a timber sale, we suggest that any road segment built in those groves be colored “red” on the opportunity map. For these roads, the tables should be changed to reflect the Social Factors of **Lifestyle, Attitudes, Beliefs & Values** at a level of “6,” the **Private/Non-recreation Public Access** value at a level of “6,” and the **Public Access (Recreation)** value at a level of “3.”

For Sequoia ForestKeeper and the Kern-Kaweah Chapter of the Sierra Club,



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