



December 10, 2015

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Subject: Road/Travel Management Opportunities in the Hume Ranger District after the Rough Fire

This letter follows up on a telephone conversation between René Voss and Marianne Emmendorfer on November 20, 2015, with regards to the Rough Fire Burned Area Emergency Response (BAER), the continuing road and area closure inside the Rough Fire area, and the final Subpart A, Travel Analysis Process, which identified road segment opportunities for changes in management and/or decommissioning. This letter also relates to the proposed Mill Flat Creek Critical Aquatic Refuge (CAR) project, in which the district has proposed to seasonally close the Davis Road and decommission 13 other segments of road to reduce resource damage to the Mill Flat Creek CAR. *See* Feb. 17, 2012 scoping letter (see Attachment A). The Rough Fire burned through most or all the CAR.

While the Rough Fire had both negative and positive effects on fuels, soils, giant sequoia groves, historic, and other resources, we believe it provides an opportunity to address long-standing issues related to roads and road management in the Giant Sequoia National Monument. We would like to discuss these opportunities and request that the Forest Service consider expanding the scope of the Mill Flat Creek project to address most or all of the road segments within the Rough Fire area that have already been identified for potential changes in management and/or decommissioning in the Subpart A analysis. In the interim, we support the continued closure of roads in the fire area and urge the Forest Service to delay any hazard tree mitigations along closed road segments until it can determine the long-term fate of those road segments. It makes no sense to mitigate tree hazards along maintenance-level 1 & 2 roads that the public or resource managers will no longer use.

Since the Forest Service plans to continue efforts with regard to the Mill Flat Creek project, we think it would make sense to use that planning effort to realize economies of scale to address related or similar concerns about roads in the larger fire area based on the Subpart A analysis. It is likely that additional funding sources will become available for restoration efforts to address concerns from the Rough Fire, and the Sequoia National Forest should use this opportunity to address our shared long-term road management concerns in this part of the Giant Sequoia

National Monument. The Rough Fire has generally been viewed as ecologically beneficial and restorative in an area where fire has long been suppressed. The effects from the fire are generally consistent with the goals of the Monument Management Plan. Now we have an opportunity to work proactively to perhaps accelerate restoration efforts in areas affected by roads we no longer need.

Minimum Road System and “Roads Not Likely Needed” in the Hume Lake Ranger District

This proposal is consistent with Forest Service direction to begin implementing the Minimum Road System (MRS) based on the completed Travel Analysis Report (TAR). Pursuant to its travel management regulations and directive memoranda, the Sequoia National Forest should start using its TAR and identify the MRS in its analysis under NEPA for site-specific projects, such as the one proposed. *See* March 29, 2012 Deputy Chief Weldon Memo to Regional Foresters at 2 (“Travel analysis should be used to inform the environmental analysis.”).

In December 2014, the Sequoia National Forest published its Travel Analysis Report, available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3828771.pdf. The report includes a thorough analysis of the entire road system and includes an identification of “roads not likely needed” for public access or resource management. For the Hume Lake Rangers District, these roads are generally depicted as “red” segments on the attached map. *See* Attachment B (SQF Opportunities Map, Northern Portion, Sept. 2013). These segments were identified as those roads for which “Access Need or Benefit Equivalent” are “low” and the “Resource Risk Equivalent” value is either “high”, “moderate”, or “low.” *See* Travel Analysis Report, p. 34, Table 10. Identification of these segments received significant analysis and public input. We suggest that these particular segments serve as a starting point moving forward, although the Forest Service should also consider including individual road segments in this process where “Resource Risk Equivalent” value is “high” and “Access Need or Benefit Equivalent” is either “moderate” or “high,” as, for example, the Millwood Rd (13S97).

Road Conditions after the Rough Fire

According to the Rough Fire BAER Road Engineering Report, available at <http://tinyurl.com/o57s4gh>, a number of high-priority primary roads will receive immediate emergency treatments to provide access and protect public safety and natural resources. With regard to secondary roads, the Forest Service has approved measures and treatments to “Storm-proof and stabilize 74 miles of level 2 FS transportation roads with improved water drainage structures and features to prevent damage resulting from post-fire watershed conditions such as soil erosion and storm water run-off, public safety hazards to improve the safety of forest visitors and employees” and “[c]onsider continuing temporary forest, road and trail closures with signage to protect public users of Forest Service System lands and recreation sites, including the temporary closure of Mill Flat Campground.” BAER Assessment Summary, available at <http://tinyurl.com/ojw4m9n>. The BAER Engineering Report states that “it is recommended to maintain an effective and consistent closure on these roads for the first winter or until the post burned watershed stabilizes.” p. 6.

We urge the Forest Service to continue these closures indefinitely for “roads not likely needed” as identified in the TAR until the District has identified its minimum road system (MRS) under NEPA.

The Mill Flat Creek CAR as a Basis for a Larger, District- or Fire-Wide Proposal

On February 17, 2012, the Hume Lake Ranger District began scoping its Mill Flat Creek Critical Aquatic Refuge project to reduce resource damage to the Mill Flat Creek CAR. *See* Attachment A. That project has been on hold, although we have been told that the District intends to continue planning for its implementation. The project addresses some of the roads identified in the Travel Analysis Report. We believe this project is a logical starting point for a larger review of implementing a district-wide roads NEPA analysis to consider road decommissioning and/or a change in road maintenance levels based on the Travel Analysis Report. We urge the district to expand that process to take advantage of opportunities for resource protections and economies of scale after the Rough Fire.

We would be happy to meet with the planning team for the district to determine how we can assist in facilitating the suggestions in this letter.

For Sequoia ForestKeeper, the Kern-Kaweah Chapter of the Sierra Club, Western Watersheds Project, WildEarth Guardians, The Wilderness Society, and California Chaparral Institute,



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