Appendix A

Response to Comments

A. Response to Comments

This appendix includes a summary of public involvement activities and efforts made to solicit public input to the Monument plan, a description of the formal public comment analysis and response to comment process, and a list of public concerns and responses. Public concern statements and our responses are organized by section to mirror the order of the topics in the FEIS. This appendix also includes copies of the city, county, state, federal, and tribal agency letters received and our letters of response.

As a federal agency, we are required by the National Environmental Policy Act (NEPA) to solicit public comment on our draft plans involving significant actions. We are directed to "assess and consider [the resulting] comments both individually and collectively." We view such comments as critical in helping us to shape a responsible plan for management of the Giant Sequoia National Monument (Monument) that best meets the purpose and need as expressed in the Presidential Proclamation establishing the Monument (see Appendix B: Proclamation). During the formal comment period, the public reviewed and commented on the DEIS and its alternative proposals for managing the Monument.

1. Public Involvement

The Notice of Intent was published in the Federal Register on June 8, 2001. A scoping letter was mailed to interested publics on the same date. Both the Notice of Intent and the scoping letter asked for public comment on the proposal from June 8, 2001 to July 24, 2001.

Public meetings on the proposal were held in Sacramento, Los Angeles, Clovis, Bakersfield, and Porterville, California from July 10 to July 16, 2001. At these meetings, the Monument planning team provided overviews of the proposed action, answered questions, discussed the timeline, and encouraged public comment.

Over 2,500 comments were received during the scoping period. Using comments from the public, tribal consultations, the scientific advisory board, and other agencies and organizations, the interdisciplinary team developed a list of potential issues to address (see next section, Issues).

Three issues of the publication "Giant Sequoia National Monument Issues and Updates" were mailed to other agencies and interested publics to provide information on the development of the Monument management plan. They were mailed in December 2000, July 2001, and April 2002.

A web site for public access was made available with information on the monument management plan, the Board, and links to other sites regarding giant sequoias. The address is: **www.r5.fs.fed.us/giant_sequoia/**.

In January 2002, a letter was mailed to the public requesting participation and information for the Roads Analysis Process as a part of the Monument planning process (see

Appendix D). Opportunities to meet with the team leader were offered as part of the input process and were scheduled with two groups in February 2002.

Public meetings were held in Porterville on March 11, 2002 and in Bakersfield on March 12, 2002. At these meetings, the monument planning team provided information on the development of alternatives for managing the Monument, answered questions, and encouraged public involvement.

The Draft Environmental Impact Statement (DEIS) was released for public comment on December 2, 2002. The full DEIS was available for review in hard copy, on compact disc (CD), and on our website (see above). Comments were requested in written form and an e-mail inbox was made available, linked to the website.

Public meetings were held in Porterville, Bakersfield, Los Angeles, and Fresno, California from February 10 to February 20, 2003. The purpose of these meetings was to review and discuss the DEIS. Question-and-answer sessions were held at the end of each of these meetings, and forms were available for submitting written comments on the DEIS.

The public comment period for the DEIS ended March 17, 2003. A total of 16,122 letters, postcards, public meeting forms, e-mails, and faxes containing comments were received from individuals; preservation and environmental groups; businesses; grazing permittees; county, state, and federal government entities; tribal governments; placed-based groups; special use permittees; wood products associations; academic institutions; and motorized and non-motorized recreational groups.

2. Analysis of Public Comment on the DEIS

All letters, emails, faxes, and comment forms received as public comment on the Monument DEIS were compiled, organized, read, and analyzed by the Monument planning team, as trained by the U.S. Forest Service Content Analysis Team (CAT). This team, a unit of the U.S. Forest Service, Washington Office, Ecosystem Management Coordination Branch, specializes in innovative approaches to public comment processing and consideration. CAT uses a process they have developed called “content analysis” which allows systematic review of public comment on a proposed plan or project through the creation and use of a comprehensive electronic comment database. This method is particularly effective in analyzing voluminous comments, both individually and collectively, as required by NEPA.

The content analysis process is comprised of three main components: a categorical coding structure and standardized process for its application, a comment database and mailing list, and a set of summary reports. Each letter, postcard, transcript text, or other document (collectively referred to as “response letters” in this appendix) is assigned a unique tracking number. Each author or signatory to a response is called a “respondent.” All respondents’ names and addresses are entered into a project-specific database program to produce a mailing list. Each respondent is also assigned a unique identifier number for tracking purposes. Respondents are linked to their individual responses and comments in the database using these identifying numbers.

Staff analysts read all response letters in their entirety and identify discrete comments within them that relate to a particular topic of concern or resource consideration. Every effort is made to keep each comment within sufficient context that it is a stand-alone statement. Analysts look for not only each action or change requested by the public, but also the reason(s) behind each request in order to capture the full argument of each comment. Therefore, paragraphs within a response letter may be divided into several comments because multiple arguments are presented or, alternatively, several paragraphs that form one coherent statement may be combined into one comment. While simple statements of opinion without a rationale are captured in the process and entered in the project database, it is the strength of each rationale as a complete argument that provides the interdisciplinary team a substantive comment to consider.

Once stand-alone comments are identified, analysts assign each comment to a numerical code that identifies the overall subject area. They use a systematic numerical categorization or coding structure that has been specifically tailored to project documents. Each project-specific coding structure is a tool to help sort comments into logical groups by topics. In this case, the coding structure was organized to follow the topic order of the DEIS documents, and was designed to be inclusive rather than restrictive in order to sufficiently capture all comments. Depending on project complexity and needs, analysts may also assign secondary codes to track those comments that refer to such subtopics as specific EIS elements, alternatives, or other plans, to permit finer-scale sorting of comments. The coding structure and other supporting documentation is available in the administrative record at the Supervisor's Office in Porterville, CA.

After being coded, the coded comments for each response letter are entered verbatim into the comment database. This database serves as the complete record of comments and allows analysts and planning team members to run specialized reports, identify public concerns, and determine the relationships among them.

The content analysis process also identifies all response letters that are submitted as part of an organized response (or "form letter") campaign and therefore contain identical text. These are grouped by campaign. Analysts code a "master" campaign letter and enter all comments verbatim into the database so that they are considered alongside all non-campaign comments. If a respondent adds original comments to the organized response letter he or she submits, these comments are identified, coded, and entered into the database.

The third phase of content analysis includes composing statements of public concern and preparing a narrative summary. Analysts review the entire comment database, sorted by topic area or code, and then write public concern statements to summarize comments that present similar arguments or positions. Each public concern statement is worded to capture the action that one or more members of the public feel the Sequoia National Forest should undertake and provides the decision-maker with a clear sense of actions the public is requesting.

Because each concern statement is a summary, it can represent one or many comments, depending on the actual comments submitted. Concern statements range from extremely broad generalities to extremely specific points because they reflect the content of verbatim

public comments. Once the comments have been exhaustively reviewed and the range of concerns identified, the interdisciplinary team determines whether comments are substantive and in scope, and then composes responses.

Public concern statements are not intended to replace actual comment letters or sample quotes. Rather, they can help guide the reviewer to comments on the specific topic in which he or she may be interested. All original response letters in their entirety are on file at the Supervisor's Office in Porterville, CA.

This process can greatly enhance the methodical review of comments and continually improve decision-making and responsiveness to the public. It is important to note that, during the process of identifying concerns, all comments have been treated equally. They are not weighted by organizational affiliation or status of respondents, and it does not matter if an idea was expressed by thousands of people or a single person. Emphasis is placed on the content of a comment rather than who wrote it or the number of people who agree with it. The process is not one of counting votes and no effort was made to tabulate the exact number of people for or against any given aspect of the DEIS. The narrative in this appendix does include general indications of the strength of public feeling found in the comment database for informational purposes. However, these comparatives must be used with caution, as they are more qualitative than quantitative in nature. Although these qualifiers give a general sense of public sentiment, they should be interpreted with caution. Those who responded do not constitute a valid random or representative sample of the general public.

Table A-1 presents three measures that give a general picture of the scope of public response to the Monument DEIS.

Table A-1: Number of Responses, Signatures, and Comments Received During the Public Comment Period for the Monument DEIS

Number of Responses	Number of Signatures	Number of Comments
16,122	16,629	4,350

Note: *This count includes comments from each master organized response campaign letter, but not the total number of the comments submitted from all respondents of each response campaign.

3. Considering Different Types of Comments under the National Environmental Policy Act

Agencies have a responsibility under the National Environmental Policy Act (NEPA) to first "assess and consider comments both individually and collectively" and then to "respond…stating its response in the final statement." The content analysis process designed by the CAT, described in the previous section, considers comments received "individually and collectively" and considers them equally, not weighting them by the number received or by organizational affiliation or by any other status of the respondent.

The NEPA requires that, after we consider comments, we formally respond to substantive comments. However, the nature and extent of each response depends on the type of concern identified.

We classified comments, or the concerns identified from them, as either falling within the scope of decision-making for the Monument DEIS or falling outside of the scope for any number of reasons described below. Counsel on Environmental Quality (CEQ) regulations define "scope" and require the Sequoia National Forest to explain why comments are determined out of scope. Generally, the scope of the plan is the range of connected, similar or cumulative actions; the alternatives and mitigation measures; and the direct, indirect, or cumulative impacts to be considered in the EIS. If we considered a concern outside of the scope, we include an explanation of why in this appendix. Generally, the types of comments received and concerns identified that were considered outside of the scope include those that:

- Do not address the purpose, need, or goals of the Monument Plan (e.g., propose an action in areas outside the Monument or that do not directly relate to the action proposed in the plan, or relate to day-to-day operational issues such as law enforcement procedures or road maintenance).
- Address concerns that are already decided by federal law or national policy.
- Suggest an action not appropriate for the current level of planning (e.g., site-specific decisions to construct new roads, campgrounds or facilities, to offer special use permits).
- Propose untenable restrictions on management of the Monument or conflict with approved plans not being revised in the Monument planning process.
- Do not consider reasonable and foreseeable negative consequences.
- Point to only minor editorial corrections.

We further classified comments within the scope of the plan as either substantive or non-substantive. Based on the Council of Environmental Quality's regulations, a substantive comment is one that:

- Questions, with a reasonable basis, the accuracy of the information in the environmental impact statement. Questions, with a reasonable basis, the adequacy of environmental analysis as presented.
- Presents reasonable alternatives other than those presented in the DEIS that meet the purpose and need of the proposed action and address significant issues.
- Causes changes or revisions in the proposal.

Non-substantive comments, or concerns identified from them, include those that simply state a position in favor of or against an alternative, merely agree or disagree with Forest Service policy, or otherwise express an unsupported personal preference or opinion.

We are required to respond only to substantive comments or the concerns identified from them. However, to fully inform the public and to use this process as an educational tool, we have chosen to respond to all public concerns identified during analysis of public comment, within and out of the scope, substantive and non-substantive alike. Responses to out of

scope concerns are generally restricted to describing why the concern is out of scope and does not merit further attention. A more elaborate answer may have been provided for clarity. Responses to substantive concerns are typically more extensive, complete, and, most importantly, offer an explanation of why or why not and where the concern may have resulted in changes to the plan or analysis. If several concerns are very similar, they have been grouped together for a single response. Public concerns that identified editorial or other errors in the presentation of information in the DEIS were used to revise text and make corrections in the FEIS. The editorial concerns identified by the public are not included in the narrative response to comment.

4. Summary of Public Comment

This summary provides an analysis of the major themes and concerns submitted by the public during the official comment period for the Monument Management Plan DEIS. These concerns range in nature from broad issues to technical specifics. The extensive public comment received demonstrates the intense interest, depth of feeling, and level of concern of the public regarding the management of the Monument.

It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. Further, those who respond do not constitute a random or representative public sample because they are self-selected, unlike scientifically designed surveys or polls. The NEPA encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may include businesses, people from other countries, children, and people who submit multiple responses. Therefore, caution should be used when interpreting comparative terms provided in this report. Every substantive comment and suggestion has value, whether expressed by one respondent or many. All input is read and evaluated and the analysis team attempts to capture all relevant public concerns in the content analysis process described above.

The results of this process serve two related purposes in public land management planning. The first is to fulfill the legal mandate of the NEPA and accompanying CEQ regulations. These statutes require planning teams to seek public comment on significant proposed actions and use it to clarify, modify, or revise analyses and conclusions in order to improve agency decision-making. The public can thus provide a vital contribution to planning efforts. The second goal of content analysis is to provide the public a review of the range of concerns, background issues, and substantive comment submitted on a project.

The Monument DEIS has inspired intense public debate focused primarily on the protection of the giant sequoias and other objects of interest, mechanical treatments, protection of communities or the urban interface, recreational access, and sensitive biological resources. Those supporting Alternative 6, the preferred alternative, believe it represents a reasonable balance of interests between resource protection and

management activities. Many of the supporters of Alternative 6 specifically endorse the proposed range of management activities to reduce fuel loadings and promote the regeneration of young giant sequoias. Those opposed to Alternative 6 tend to fall into two broad groups. One group believes the preferred alternative focuses too heavily on active management and does not go far enough to protect forested ecosystems. Therefore members of this group endorse Alternative 4. The other group believes Alternative 6 is too restrictive, especially in regards to the 30" diameter limit and developed recreation, and endorses a modified version of Alternative 6.

While there is overall agreement among respondents that increasing recreational and urban interface pressures necessitate changes in forest management, there is disagreement as to how those pressures should be alleviated. The reasons for the polarity of opposition to the preferred alternative are well illustrated in the debate between supporters of Alternative 4 and supporters of Alternative 6 or a modified version. This debate is driven in large measure by competing values and viewpoints. In general, those who support Alternative 4 and those who support Alternative 6 fall into two camps in terms of how they value forest resources and in terms of how they view the role of government. The differences are not always clearly defined, and may sometimes be more perceptual than real. Therefore common values and fundamental points of agreement among various stakeholders tend to be obscured by conflicting social values and underlying assumptions. These values, personal experiences, and assumptions lead to the expression of impassioned views on public land management in general and the Monument Plan in particular.

Most individuals, regardless of which alternative they support, identify themselves in terms of personal background, values, and direct experiences on the Monument. It is clear that this Monument exerts a powerful influence on residents and visitors alike. Respondents care very deeply about the management of the Monument and most express a strong sense of personal ownership. Individuals from all recreational user groups use similar terms to describe why they value recreating in the Monument. Most often mentioned are the giant sequoias, scenic beauty, open space, the wilderness experience, wildlife, and opportunities for developed and dispersed activities. However, there is a fundamental lack of agreement over which activities are compatible with each other and with preserving and protecting the objects of interest. The mix and levels of acceptable activities are also hotly contested. It is clear that the preferred public land management approach of each group is rooted in basic differences in viewpoint and values regarding the utility and highest public benefit of the Monument's natural resources.

Those favoring Alternative 4 tend to see Monument lands as whole ecosystems that are disrupted by management activities. For these respondents, protecting the Monument consists of minimizing human disturbance and encouraging or mimicking natural processes. Active management activities are often viewed as unnecessary and unwise meddling in complex natural systems that humans do not yet fully understand. Supporters of Alternative 4 often note the Forest Service's acknowledgement that decades of well-meaning fire suppression for forest health have resulted in exactly the opposite condition. They therefore question whether modern management practices are any better. Those who favor Alternative 4 see the forest as an ecosystem whose long-term functioning is best preserved by restoring natural disturbance regimes such as fire, insect, and disease

cycles. They note that disease, death, and decay are not only normal but crucial elements of natural systems, and extensive human interference harms the delicate balance of nature. Persons holding this view place a high priority on protecting the environment. They believe intact forest ecosystems should be protected for their own intrinsic value, for the benefit of wildlife, and for the non-commodity benefits public lands offer to humans. Many thus describe the Monument as an important provider of under-appreciated but vital ecosystem services such as biodiversity, clean drinking water and air, solitude, and spiritual renewal. As such, they believe that ecosystem protection is rarely compatible with active management or intensive motorized use.

While they value many similar forest characteristics, advocates of Alternative 6 perceive proper management of Monument lands differently than those who favor Alternative 4. They also see national forests in terms of the resources they offer for human use, but identify a different set of primary uses. Many of these users also express significant concern for the environment. However, they feel that negative impacts of human activity are greatly exaggerated. Respondents often note that they themselves are responsible users who cause no harm. They are therefore personally insulted by accusations to the contrary. Since they feel that their activities are legitimate and sustainable uses, any proposed restrictions on their activities are perceived as a violation of fundamental fairness, democratic principles, and civil liberties. Some feel that the Forest Service is over-reacting to unsupported charges of damage and legal threats by environmentalists.

Those supporting Alternative 6 tend to see national forests as natural systems whose health is often threatened by unmanaged natural processes. They tend to favor a utilitarian or agricultural model whereby human ingenuity and modern timber management can maximize forest health for human benefit. These respondents argue that the management approach dictated by Alternatives 3 and 4 sentences the Monument to catastrophic wildfire, increased disease and insect damage, and wasted timber resources. Moreover, they argue, prudent management benefits wildlife as well as humans by creating varied game habitat. Finally, access to such forest resources is seen by many as an important component of regional economic health, which would be threatened by adoption of Alternatives 3 or 4.

Thus what separates the supporters of various alternatives is a difference in perspective regarding the fundamental nature of public lands, ecosystem health, appropriate human uses, and the role of land managers. This difference in perspective gives way to significant polarization on all sides and the sentiment that all users have a great deal to lose depending on the outcome of the Monument plan. This in turn leads to public concern over the objectivity of the decision-making process and each group's ability to influence the planning process. Advocates of Alternative 6 defend activities that those favoring Alternative 4 decry, and vice versa. Both sides charge that the other is well financed and overly influential, and thus members of each group frequently see themselves as the underdog. Advocates of Alternative 6 believe their voices no longer count nationally and that the only voices that do count are those of the environmentalists. Conversely, supporters of Alternatives 3 or 4 often assert that vested economic interests such as the timber industry and the motorized vehicle lobby continue to hold excessive influence over both local forest officials and elected representatives at all levels of government. Since fish, wildlife, and old-growth trees can't vote or donate money to political campaigns, they

say, individuals and environmentalists must staunchly defend these values. This perception of undue influence and disenfranchisement accentuates the distrust many advocates of Alternative 4 harbor for the Forest Service.

In summary, those favoring Alternative 4 and those favoring Alternative 6 appreciate similar natural characteristics of the Monument but hold very different assumptions and beliefs regarding the true environmental effects of various uses and the proper mix of management activities. These competing views are expressed by respondents within the context of a number of concerns relevant to the Monument plan. The DEIS identified eight issues: air quality, fire and fuels, giant sequoia, mixed conifer restoration, recreation, social values regarding vegetation treatments, watershed, and wildlife. The themes addressed by those commenting on the Monument DEIS are, for the most part, complementary to these issues.

5. Response to Comments on the Monument Plan DEIS

The following public concern statements are identified by a letter and number in order to facilitate tracking throughout the analytical and response process. These numbers are for identification purposes only. They are not necessarily sequential, not all numbers in sequence have been used due to the iterative nature of public concern identification, and these numbers in no way indicate a ranking by priority or importance. As described in the Introduction section, each public concern statement was derived from one or many individual public comments. However, these supporting comments have been deleted here due to space constraints. Our interdisciplinary team reviewed both the public concern statements and the supporting comments in the preparation of our responses. Interested parties may consult the content analysis reports and the reading file of original response letters on file at the Supervisor's Office in Porterville, CA.

a. Chapter I

(1) Purpose and Need

PC# 62: The Monument Plan should provide direction to protect the Monument as stated in the Presidential Proclamation.--and--

PC# 63: The Monument Plan Purpose and Need should address the need to reduce fuels and restore regeneration in the Monument.

Response: The purpose and need derived from the Presidential Proclamation states that there is a need to take action regarding two critical problems facing the giant sequoias and their ecosystem 1) the heavy buildup of surface fuels and woody debris, leading to an increased hazard from wildfires; and 2) a lack of regeneration of young giant sequoias to ensure long-term sustainability of the species

(see the Purpose and Need section of Chapter I in the FEIS). The EIS that addresses that Purpose and Need must be within its confines. The Monument was set aside for the "…purpose of protecting ….all lands and interests in lands owned or controlled by the United States…." Furthermore, the Proclamation states, "No portion of the monument shall be considered to be suited for timber production, and no part of the monument shall be used in a calculation or provision of a sustained yield of timber from the Sequoia National Forest. Removal of trees, except for personal use fuel wood, from the Monument may take place only if clearly needed for ecological restoration and maintenance of public safety (see the Proclamation in Appendix B of the FEIS). The application of clearly needed is discussed in the introduction of Modified Alternative 6 in Chapter II of the FEIS and in the ROD. Tree removal may occur for the purpose of ecological restoration and maintenance or public safety in the Monument. No allowable sale quantity is calculated from the lands within the monument. However, any tree that is removed incident to ecological restoration or public safety activities may be sold for revenue to be used in additional protection and restoration projects.

Though the DEIS refers to the naturally occurring groves of giant sequoia (DEIS, page I-2) as an object of interest, the entire Monument is considered and referenced. The objects of interests defined in Chapter I include the naturally-occurring groves of giant sequoias, the ecosystems surrounding the groves, the historical landscape in and around the Hume Lake Basin, and the limestone caverns and pre-historic archeological sites. The Sequoia National Forest has planted giant sequoias outside of groves in many areas of the forest. Most notably, sequoias were planted in the area burned by the Stormy Fire, which is outside of the Monument. Sequoias were not always planted in the location from which the seed was collected, so the planted sequoias may have a different genetic identity than the sequoias that naturally regenerate on the site.

The Presidential Proclamation and its wording were adhered to as closely as possible. The Proclamation is the guiding document to develop an ecologically sound management plan for the Monument.

(2) Decision to be Made/Decision-making Authority

PC# 64C: The Monument should be managed by an agency other than the Forest Service. --and--

PC# 65C: The Forest Service should be allowed to direct and manage the Monument. --and--

PC# 82C: The EIS should discuss management of National Monuments administered by other agencies.

Response: The Proclamation is clear on what agency is to manage the Monument: "The Secretary of Agriculture shall manage the monument, along with the underlying Forest, through the Forest Service, pursuant to applicable legal authorities, to implement the purposes and provisions of this proclamation (see the Proclamation in Appendix B of the FEIS)."

The Proclamation also states: "The Secretary, through the Forest Service, shall, in developing any management plans and any management rules and regulations governing the monument, consult with the Secretary of the Interior, through the Bureau of Land Management and the National Park Service…The final decision to issue any management plans and any management rules and regulations rests with the Secretary of Agriculture. Management plans or rules and regulations developed by the Secretary of the Interior governing uses within national parks or other national monuments administered by the Secretary of the Interior shall not apply within the Giant Sequoia National Monument (see the Proclamation in Appendix B of the FEIS)." As directed by the Proclamation, we have contacted and consulted with natural resource managers, particularly giant sequoia specialists, from Sequoia and Kings Canyon National Parks, the Bureau of Land Management, the Tule River Indian Tribe, the California Department of Forestry and Fire Protection, and educators from the California Polytechnic University at San Luis Obispo and the University of California at Berkeley. For more information on consultations, please see the Disclosures section of Chapter IV.

(3) Scientific Advisory Board

PC# 66C: The Forest Service should use input from the Scientific Advisory Board in developing the Monument Plan. --and--

PC# 115C: The Scientific Advisory Board should provide the strong guidance in formulating the Monument Plan as mandated by the Proclamation.

Response: We agree. Please see Appendix C of the FEIS for a listing of the Advisories from the Scientific Advisory Board (Board) and how they were used in this FEIS, as well as the Final Report of the Board. The Board met seven times. It reviewed the DEIS for consistency with the best available science and responsiveness to the Board's own advisories. It issued 27 Advisories to the Forest Service, including one titled "Heeding Advisories."

The Scientific Advisory Board was created by the Secretary pf Agriculture for the purpose of providing scientific guidance during the development of the initial monument management plan. The Board represents a range of scientific disciplines including the physical, biological, and social sciences. The Board has held eight meetings, in various locations through out the development of the FEIS. At its first meeting, members of the Board elected a chairperson and a co-chairperson to lead their discussions. The chairperson has worked closely with the Monument planning team and the Designated Official in preparing the meetings. Forest Service personnel are present during the meetings to answer questions, hear the Board's discussions, and take the meeting notes. For the most part throughout the meetings, the Forest Service has allowed the Board to have discussions with little influence. The Board has offered their advice in the form of official Advisories. These Advisories have been used where possible during the development of the plan. The Monument planning team has also contacted members of the Board individually to gain input and determine if the planning team was using the Advisories correctly.

PC# 67C: The Forest Service should use the best science available in deciding how to manage the Monument.

Response: We agree. The Proclamation states: "Unique scientific and ecological issues are involved in management of giant sequoia groves, including groves located in nearby and adjacent lands managed by the Bureau of Land Management and the National Park Service. The Secretary, in consultation with the National Academy of Sciences, shall appoint a Scientific Advisory Board to provide scientific guidance during the development of the initial management plan. Board membership shall represent a range of scientific disciplines pertaining to the objects to be protected, including, but not necessarily limited to, the physical, biological, and social sciences. The Secretary, through the Forest Service, shall, in developing any management plans and any management rules and regulations governing the monument, consult with the Secretary of the Interior, through the Bureau of Land Management and the National Park Service (see the Proclamation in Appendix B of the FEIS)."

As directed by the Proclamation, a Scientific Advisory Board was appointed and provided scientific guidance during the development of the management plan (see the Advisories and Final Report from the Scientific Advisory Board in Appendix C of the FEIS). Throughout development of the EIS, interdisciplinary team members sought and used the best available science to guide and inform their analyses. Please note the sources referenced throughout the text and the list of references in Chapter 8 of the FEIS.

While preparing this Monument Plan, interdisciplinary team members also contacted and consulted with natural resource managers, particularly giant sequoia specialists, from Sequoia and Kings Canyon National Parks, the Bureau of Land Management, the Tule River Indian Tribe, the California Department of Forestry and Fire Protection, and educators from the California Polytechnic University at San Luis Obispo and the University of California at Berkeley. For more information on consultations, please see the Disclosures section of Chapter IV.

The proposals for the Monument include a scientific research, monitoring, and adaptive management component, to ensure that science-based studies will continue to have an effect on the management of the Monument. Please see Appendix G of the FEIS.

(4) Public Involvement

PC# 68: The FEIS should contain enough specificity to give the public a clear picture of the proposed management.

Response: We agree. In response to many public comments, as well as a new Advisory from the Scientific Advisory Board, we have added information and visual aids such as pictures and flowcharts to the FEIS to make it easier to visualize the proposed management. These additions are especially evident in the Desired Conditions, Monitoring and Adaptive Management, and Determining the Appropriate Treatment sections of Chapter II.

PC# 69: The Forest Service should incorporate environmental advocates such as the Sierra Club in every step of the planning process.

Response: The Forest Service involved several environmental groups such as the Sierra Club in the planning process. Representatives from these groups received all newsletters and information; attended Scientific Advisory Board meetings, addressed the Board, and communicated with the Board in-between meetings; attended all public and open house meetings held for this planning process; and submitted lengthy comments during the public comment periods. The Sierra Club even drafted an alternative and submitted it to the Forest Service, which was used in developing one of the alternatives considered in the DEIS.

PC# 70: The EIS should include a discussion or reference to how the comments to the NOI were used.

Response: Please see the Public Involvement section of Chapter I for a discussion of the comments received on the Notice of Intent (NOI) and scoping letter. Over 2,500 comments were received and used to develop significant issues.

For comments received on the Monument Plan DEIS, please see Appendix A, Response to Comments. At the beginning of that appendix, there is a discussion of how these comments were analyzed, considered, and summarized, followed by a lengthy response section.

(5) Issues

PC# 71: The FEIS should consider tree removal as an "issue."

Response: The issue of removing trees was considered in the FEIS. The issue titled Social Values Regarding Vegetation Treatments was an attempt to bring to the forefront the concerns regarding tree removal and trust in the Forest Service. Mechanical activities defined in the issue statement in Chapter I of the FEIS include mechanical vegetation treatments, which include logging and the removal of trees. In the strictest sense of the word, logging is defined as the felling of trees and taking them to the mill, or the removal of trees.

PC# 72: The FEIS should consider transportation as an issue.

Response: A Transportation Plan is required as a part of the Monument management plan by the Proclamation: “The management plan shall contain a transportation plan for the monument that provides for visitor enjoyment and understanding about the scientific and historic objects in the monument, consistent with their protection (Appendix B).” As a result, Transportation became one of the four management strategies developed for each alternative (see Chapter II of the FEIS) and transportation plans are described for each alternative in Appendix F.

For an explanation of how significant issues were identified, please see the Issues section of Chapter I of the FEIS. Issues and management strategies are different components of the Monument Plan EIS. Issues are points of discussion, debate, or dispute about environmental effects. Significant issues were identified that were significant to managing the Monument at this point in time. They were used to develop alternatives, determine what mitigation or constraints are needed, and help focus the analysis. Management strategies, on

the other hand, are the strategies developed to respond to the significant issues. The four strategies (restoration, protection, recreation/human use, and transportation) are described for each alternative and differ by alternative.

PC #73: The issues and indicators in the EIS should tie directly to the Proclamation.

Response: Issues are a point of discussion, debate, or dispute about environmental effects related to a proposed action. They are derived from the public. The Proposed Action must meet the Purpose and Need that, in the case of the Monument, was prescribed in the Proclamation. Issues are not intended to tie directly to the Proclamation. The Issues section of Chapter I of the FEIS explains that issues are divided into two categories: significant and non-significant. Non-significant issues include: those that are outside the scope of the proposed action; those that are already decided by law, regulation or other higher-level decision; those that are irrelevant to the decision to be made; and those that are conjectural and not supported by scientific or factual evidence. Significant issues are used to develop alternatives, to determine what mitigation or constraints are needed, and to help focus the analysis. Indicators presented for each issue are used to measure change relating to that issue.

PC# 74: The Forest Service should modify the Proposed Action to respond to the issues.

Response: That would not follow the regulated process of the National Environmental Policy Act (NEPA). The Proposed Action is the initial proposal in the NEPA process (40 CFR 1508.23) and is sent to the public in a process of scoping to help the Forest Service develop issues. Then the issues become the basis for alternatives to the Proposed Action. The entire set of alternatives, including the original Proposed Action, is analyzed for environmental effects and for responsiveness to the issues.

b. Chapter II

(1) Alternatives/Management Direction

PC# 75: The Forest Service should present a policy in line with the protections presented in the Proclamation and the Framework.

Response: All of the alternatives, Alternatives 1 through Modified 6, include all of the direction provided in the Proclamation, some of the direction found in the Framework, and some of the direction found in

the Forest Plan. Each of the alternatives include, as one of four management strategies, a Protection Strategy, defined as the strategy to reduce the risk of catastrophic fire to communities and the objects of interest. Other protection objectives for giant sequoias and their ecosystems, historic and prehistoric resources, and caves are evident in the Management Goals, Allocations, and Standards and Guidelines listed for the alternatives in Chapter II, as well as the Standards and Guidelines in Appendix A of the Record of Decision (ROD).

PC# 77: The Forest Service should present a management plan based on objectives.

Response: The regulations for broad planning, such as this Monument Plan, are found in the National Forest Management Act and the National Environmental Policy Act (NEPA). They direct the Forest Service to use the Purpose and Need to develop a Proposed Action. The Proposed Action is submitted to the public for their consideration and issues. The Forest Service then uses the issues to develop alternatives to the Proposed Action. The alternative must meet the purpose and need defined and strive to reach the objectives defined in the desired conditions.

PC # 79: The Monument Plan should better define the creation of the Hume Lake Historic Area.

Response: The Hume Lake and Converse Basin areas of the Monument were described in the Proclamation as areas of significance related to the history of giant sequoia logging. The Proclamation discusses the "treasure trove of historical photographs and other documentation" from these areas (Appendix B). Much of the history of the area is documented in *They Felled the Redwoods,* a book by Hank Johnston (Stauffer Publishing, 1996). Hume Lake itself was created as a millpond for the Hume-Bennett Company Mill, which was built to make logs of the timber coming from Converse Basin and surrounding areas. The area contains a wealth of history, prompting its designation as a management area in most of the action alternatives (Chapter II of the FEIS). The intent is to preserve and interpret the extraordinary historical and cultural value of the site. The Hume Lake Historic Area is directly adjacent to the groves affected by the historic logging: Converse Basin, Abbot Mill, Indian Basin, Cherry Gap, Evans Complex, Landslide, and others. Maps and information from *They Felled the Redwoods* were used in defining the management area.

PC# 84C: The Preferred Alternative, Number 6, should follow the Proclamation and provide protection to the Monument.

Response: We agree. In order to be considered in detail, each alternative must meet the Purpose and Need for the Monument Plan. Each must address the needs and opportunities identified in the Proclamation, as well as protect and provide proper care and management for the objects of interest.

PC# 85C: The Forest Service should be able to use the widest possible range of management strategies to reduce fuels and promote regeneration.

Response: Thank you for your comment. We would like to reach the goals of reducing fuels and promoting regeneration in order to protect the Monument from catastrophic wildfire and to preserve the giant sequoia species.

PC# 86C: The Forest Service should modify the Preferred Alternative to incorporate lower levels of impacts to resources.

Response: Please see the description of Modified Alternative 6 in Chapter II of the FEIS.

PC# 87C: The Forest Service should incorporate new information and analysis presented in the Sierra Nevada Forest Plan Amendment Supplemental EIS.

Response: Additional analysis and guidelines are included in Chapters II and IV of the FEIS. A final decision has not been reached on the Framework Supplemental EIS. When the final decision is published, it will be reviewed for consistency with the Monument Plan.

PC# 91C: The Forest Service should adopt Alternative 1. --and--

PC# 92C: The Forest Service should not adopt Alternative 1. --and--

PC# 97C: The Forest Serviced should adopt Alternative 3. --and--

PC# 53C: The Monument Plan should present a low impact, cost-effective approach to managing the Monument, such as Alternative 3. --and--

PC# 98C: The Forest Service should not adopt Alternative 3. --and--

PC# 116C: The Forest Service should adopt Alternative 4. --and--

PC# 88C: The Forest Service should adopt a modified version of Alternative 4.--and--

PC# 89C: The Forest Service should adopt Alternative 5.--and--

PC# 90C: The Forest Service should not adopt alternative 5 because it would allow more timber harvest and disturbing than the other alternatives.--and--

PC# 117C: The Forest Service should not adopt Alternative 6. --and--

PC# 114C: The Forest Service should not adopt Alternatives 1, 2, 3, 5, or 6.

Response: Many people voiced an opinion in clear support of or opposition to one of the alternatives presented in the DEIS. Many of these opinions were offered with supporting reasons; some were written as votes, stating a position, but lacking a substantiating argument. Each comment was individually read and reviewed for the specific content by the content analysis team.

The most common reasons for citing support of, or opposition to, a particular alternative addressed some component (or multiple components) of the following concerns:

- Protection of the giant sequoia and other objects of interest
- Tribal use of the Monument
- Mechanical treatments; tree removal
- Range of management activities
- Threat of catastrophic fire
- Regeneration of giant sequoias
- Wide range of recreation uses
- Maintaining access
- Consistency with the Proclamation
- Watershed integrity

Most of these concerns are specifically addressed in the responses to public concern statements in the Chapter III or resource areas section of this appendix (i.e., Fire and Fuels, Giant Sequoia, Watershed, Wildlife).

Comments on and concerns about individual alternatives are used to gauge public values, beliefs, and attitudes. This information was used to identify information in the DEIS that was not presented clearly and understandably. The new preferred alternative and Chapters I, II, III, and IV of the FEIS reflect this.

Many comments included statements asking that certain items be taken from some alternatives and combined with parts of other alternatives to form a new alternative comprised of the best features of several alternatives. These comments were taken into consideration and in some cases contributed to the formulation of Modified Alternative 6. In many cases, we received comments representing two or more points-of-view on specific alternatives; therefore, not all preferences or opinions are reflected in the preferred alternative.

PC# 96: The Proposed Action (Alternative 2) should be consistent with the Proclamation.

Response: To be consistent with the Proclamation, the Proposed Action must focus on fuels reduction and giant sequoia regeneration, must provide for the objects of interest, must provide for continued existing human use, and must honor the specific requirements contained in the Proclamation. The Proposed Action does all these things.

(2) Relationship to Other Plans

PC# 83C: The Forest Service should follow the management already presented for the Monument. --and--

PC# 198: The Monument Plan should be consistent with the Framework. --and--

PC# 200: The Forest Service should provide a rationale for any variation from Framework policies.

Response: All of the alternatives, Alternatives 1 through Modified 6, include all or some of the direction found in the Framework. Please see the Framework Direction section and the Allocations, Standards and Guidelines sections for each action alternative in Chapter II, as well as Appendix D of the FEIS and Appendix A of the ROD. As the Framework ROD states: “Lands within the monument are subject to the decisions made through this ROD. However, the monument management plan, and subsequent plan amendment, may modify this direction to protect the values for which the monument was created (USDA Forest Service, 2001, ROD, page 18).”

PC# 197: The FEIS should include the terms of the MSA for the Sequoia National Forest.--and--

PC# 199: The Monument Plan should be consistent with the Monument proclamation, the 1992 proclamation exempting the groves from timber harvest, the MSA, and the NEPA.

Response: All of the alternatives, Alternatives 1 through Modified 6, include all of the direction provided in the Proclamation, some of the direction found in the Framework, and some of the direction found in the Forest Plan. These alternatives were designed to be consistent with the NEPA and are required to meet the Purpose and Need for preparing a management plan for the Monument (see the Purpose and Need section of Chapter I). Discussion of the relationship between this Monument management plan and the Mediated Settlement Agreement (MSA) can be found in the ROD.

PC# 201: The Monument Plan should actively manage for forest health as outlined in the National Fire Plan.

Response: The Proclamation emphasizes the protection and restoration of the natural resources in the Monument, including giant sequoia groves and their ecosystems. Each of the alternatives proposes, as part of its four major strategies, a Restoration Strategy, defined as "The strategy that addresses the need to restore key terrestrial and hydrologic processes and structures, especially the regeneration of giant sequoias and the re-introduction of fire to fire-dependent ecosystems (Management Strategies sections in Chapter II)." Different components of forest health are discussed in the Desired Conditions, Management Goals, Management Strategies, and Management Areas and Emphases sections of Chapter II.

PC# 202: The Monument Plan should not be tiered to other plans.

Response: The Proclamation establishing the Monument states that the Forest Service shall manage the Monument "pursuant to applicable legal authorities" and prepare a management plan for the Monument (see Appendix B of the FEIS). The Monument Plan is a forest-level management plan that amends the current Sequoia National Forest Land and Resource Management Plan (Forest Plan), as previously amended by the Sierra Nevada Forest Plan Amendment (Framework). NEPA regulations require us to:

- Reduce excessive paperwork by "tiering from statements of broad scope to those of narrower scope, to eliminate repetitive discussions of the same issues (40 CFR 1500.4(i))."
- Employ tiering "to relate broad and narrow actions and to avoid duplication and delay (40 CFR 1502.4(d))."

- Tier EISs "to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review (40 CFR 1502.20)."

For more discussion of the relationship between the Monument and current management direction, please see the Purpose and Need section of Chapter I, and the Management Direction Common to All Alternatives section of Chapter II.

PC# 204: The EIS should discuss potential conflicts between the proposal and federal, regional, state, and local land use plans.--and--

PC# 205: The FEIS should more fully disclose the relationship of the final plan to the Framework.

Response: Please see the discussion on this topic in the Other Effects section of Chapter IV, as well as in the ROD.

(3) Relationship to National Laws and Policies

PC# 80C: The Forest Service should consider the President's healthy forest initiative in managing the Monument.

Response: The Healthy Forest Initiative includes legislative proposals under consideration that are not current law, regulation, or policy. Ideas similar to those in the Healthy Forest Initiative have been considered in the Monument Plan.

(4) Desired Conditions

PC# 93: The Forest Service should propose an alternative that will better move the resources toward desired conditions.

Response: The FEIS presents a broad range of alternatives in Chapter II. Each alternative proposes a different mix of management goals, management strategies, and management areas and emphases to respond to the varied and sometimes-conflicting issues for the Monument management plan (Chapter I, Issues section). The progress toward desired conditions would vary by alternative since each alternative differs in the pace, scope, and nature of its proposed management activities.

PC# 94: The Monument Plan should better define Desired Condition.

Response: A Desired Condition is "a broad, overarching description of conditions that are desirable for key resources or opportunities within the Monument." This new definition of Desired Condition, as well as refined descriptions of the desired conditions common to all action alternatives, can be found in the Desired Conditions section of Chapter II of this FEIS.

PC# 95: The Monument Plan should choose a different desired condition for giant sequoia ecosystems.

Response: The use of conditions prior to 1875 as reference conditions is not only based on Scientific Advisory Board Advisories, but also extensive collaboration with members of the Giant Sequoia Ecological Cooperative and other agencies who manage giant sequoia ecosystems. The reasons for doing so are stated in Advisory III from the Board: "For the near future and because environmental conditions have not yet deviated radically from pre-1875 conditions, the goal of restoring stability and resilience can be met by using the pre-1875 mosaic of vegetation as a reference (Stephenson 1996). For example, many forested areas of the Monument are denser and have much more surface fuel now than in pre-1875 times. Restoring pre-1875 forest densities and fuel loads would make these forests more stable (e.g., resistant to being severely altered by wildfire, droughts, pathogen outbreaks, or air pollution), and more resilient (more able to rebound from such stressors when they occur) (Appendix C, Scientific Advisory Board Final Report and Advisories)."

The term pre-1875, defined as A.D. 900-1875 in Advisory II, refers to an era, not a specific benchmark date. It is used in the desired condition statement to discuss reference conditions, not target conditions, the intent being to restore important natural processes (such as fire) that existed during that period.

(5) Range of Alternatives

PC# 99: The Forest Service should provide a broad range of alternatives.

Response: Chapter II describes a broad range of alternatives in compliance with the NEPA. This act requires agencies to "rigorously explore and objectively evaluate all reasonable alternatives" (40 CFR 1502.14). The alternatives analyzed cover a range of options. All include certain treatment methods such as prescribed burning or

mechanical methods, but each alternative proposes different levels of the various treatment methods.

Each alternative meets the Purpose and Need moves resources toward their desired condition, though each alternative does this at a different rate. All of the action alternatives address the significant issues.

(6) Adequacy of Analysis

PC# 1: The Monument Plan should present clear and specific direction for managing the Giant Sequoia National Monument.

Response: Thank you. Due to comments like yours and advice from the Scientific Advisory Board, we have added more specific discussion and visual aids to the Monument Plan to make its management proposals more clear.

PC# 11: The Monument Plan should present clear and specific direction for managing the Monument.

Response: The FEIS for the Monument Plan has been revised to provide clarity to the alternatives. The final Monument Plan, or selected alternative, is summarized in the ROD. This will provide a clearer and more direct vision of how the Monument will be managed in the years to come.

The Monument Plan is not intended to direct site-specific management of the Monument. Following the development of and decision on the Monument Plan, monument managers will be required to complete site-specific NEPA analyses prior to completing projects to manage the Monument. The Monument Plan is a programmatic document designed to guide management and additional analysis. The development of the Monument Plan has been consistent with the NEPA process.

Some confusion exists as to what document or part of these documents constitutes the actual management plan for the Monument. NEPA requires that the Forest Service develop and analyze alternatives for the management of public lands. This process for the Monument resulted in the analysis of six possible plans for management as presented in the DEIS. The FEIS adds a modified version of Alternative 6 and therefore presents a total of seven alternatives for detailed analysis. One of these alternatives has been selected by the Deciding Official and is now the management plan for the Monument. The alternatives as presented are essentially seven different plans, of which one has been selected and will be

implemented. The ROD for this FEIS summarizes the selected alternative.

(7) Monitoring and Adaptive Management

PC# 206: The Monument Plan should promote cooperative communication with adjoining land management agencies.

Response: While preparing the Monument Plan, interdisciplinary team members contacted and consulted with natural resource managers and giant sequoia specialists from Sequoia and Kings Canyon National Parks, the Bureau of Land Management, the Tule River Indian Tribe, the California Department of Forestry and Fire Protection, and educators from the California Polytechnic University at San Luis Obispo and the University of California at Berkeley. For more information on consultations, please see the Disclosures section of Chapter IV.

The Monument Plan promotes cooperation with other agencies and entities as discussed in the Desired Conditions, Scientific Study, and Management Goals (Common to All Action Alternatives) sections of Chapter II, as well as in the Scientific Study and Research section of Appendix G of this FEIS.

PC# 207: The Monument Plan should incorporate adaptive management to individual groves or sites. --and--

PC# 208: The Monument Plan should incorporate adaptive management to individual groves or sites.--and--

PC# 210: The Forest Service should select a specific site and use it as a pilot study to see what management techniques work. --and--

PC# 211: The Forest Service should implement an adaptive management program as an integral part of the EIS.

Response: The Proclamation emphasizes the need and opportunity within the Monument to scientifically study different approaches to management. A plan for adaptive management is described in Appendix G. It reflects Monument-specific considerations as well as incorporating requirements from the Framework. It is our intent to rigorously apply new information gained from monitoring and scientific study to all levels of management, from site-specific areas (e.g., groves) to broad landscapes.

PC# 209: The EIS should present a more specific monitoring plan.

Response: Appendix G has been more fully developed for the FEIS and includes a Scientific Study and Research Plan, additional monument-specific monitoring requirements (particularly for wildlife), and explicitly incorporates the adaptive management strategy from the Framework. Cost estimates for each monitoring item are not intended to be budget allocations. Specific budget requests and allocations would be based on the implementation of each monitoring protocol, which varies from year to year. The Scientific Advisory Board (Appendix C, Advisory XXIX) states in part "…The Monitoring plan described in Appendix E is logical in structure, and quite comprehensive (and daunting) in its requirements, reflecting the requirements of the Adaptive Management Strategy found in the Sierra Nevada Framework…" As the monitoring plan and scientific study plan are developed and implemented, the results will be compared to the desired outcomes set forth in the FEIS. Appendix G also discusses and displays the relationship of monitoring and scientific study to adaptive management.

PC# 213: The EIS should promote a multi-faceted approach to experimental management.

Response: Appendix G of the FEIS describes a Scientific Study and Research Plan. The plan identifies management questions that will guide its initial implementation and form a foundation for refinements and additions.

c. Chapter III

(1) Resource Management

PC# 51C: The Monument Plan should define enforceable standards to govern road construction and vegetation removal when clearly needed for restoration.

Response: We agree. Please see the Allocations, Standards and Guidelines sections in Chapter II of the FEIS and the listing of standards and guidelines in Appendix A of the ROD.

PC# 52C: The Monument Plan should preserve the Monument for the good of all mankind. --and--

PC# 81C: The Monument Plan should offer equal protection to and restoration of all of the objects of interest.

Response: We agree. We have added much more of the language used in the Proclamation in describing the objects of interest and desired conditions in Chapters I and II.

PC# 55: The FEIS should analyze resource requirements and conservation potential as required by NEPA (1502.16).

Response: The environmental consequences required by NEPA section 1502.16 are found in Chapter IV of the FEIS, including the section titled Other Effects.

PC# 56C: The EIS must discuss revisions of the Framework as well as Forest Plan revision.

Response: In the Other Effects section of Chapter IV, the DEIS reveals that the Framework is under review for potential revision. At the time the DEIS was released, review of the Framework was still ongoing and no new direction had been released. Since that time, the Framework Review Team released their findings and a Draft Supplemental EIS was issued. Modified Alternative 6 incorporates the new information and standards and guidelines presented in the Draft Supplemental EIS that better address the issues for the Monument. Whether the final decision on the Framework includes these or not, the Monument Plan will include them. Forest Plan revision for the Sequoia National Forest is scheduled to begin in FY 2004. The extent of this revision is yet to be determined and is beyond the scope of this FEIS.

PC# 57: The EIS requires a cumulative effects analysis.

Response: Cumulative effects must consider past actions, proposed actions, present actions, and reasonably foreseeable future actions. All of these components comprise cumulative effects as seen by the NEPA. Chapter III, Affected Environment, describes each resource as it appears at the present point in time. The environmental consequences as presented in Chapter IV include discussions of the direct, indirect, and cumulative effects of implementing the alternatives presented in Chapter 2.

(2) Air Quality

PC# 58: The Monument Plan needs to consider burn levels that are commensurate with air quality restrictions.

Response: The FEIS has examined the historical potential for burn day availability. The results indicate that the planned prescribed fire activity is consistent with available burn days and current air quality restrictions.

PC# 59: The Forest Service should work with the Air Quality Board to lessen emissions that are damaging the forest.

Response: This work is in progress. The Forest Service is currently conducting monitoring and research to address impacts that may be occurring to sensitive resources. We currently maintain long term plots to evaluate the impacts of ozone on vegetation, conduct surface water chemistry evaluations to examine air pollution deposition to water bodies, and monitor visibility in Class I Wilderness areas such as the Dome Land Wilderness. The data from these monitoring efforts are shared with regulatory agencies that can address impacts through regulations and emission reduction strategies.

PC# 60: Analysis in the EIS should consider health effects due to smoke.

Response: The effects of smoke on health and overall air quality is accounted for in the regulatory structure and the coordination between land management agencies and the San Joaquin Valley Air Pollution Control District (SJVAPCD). The emissions inventory from planned prescribed burning was incorporated into the SJVAPCD modeling and subsequent attainment plans. The SJVAPCD has recently developed rules in response to California's Title 17 that address prescribed burning with strategies to reduce impacts from smoke. Forest staff is currently developing more comprehensive monitoring for smoke and improved public notification and dialogue measures.

PC# 61: The EIS should present an analysis of cumulative effects on air quality.

Response: The regulatory framework (Title 17) that controls agricultural and wildland prescribed fire in California is designed to control cumulative effects through allocations based on meteorological conditions influencing smoke dispersion. The Sequoia National Forest and other cooperating wildland agencies work closely with the San Joaquin Valley Air Pollution Control District and the California Air Resources Board to prioritize wildland prescribed fire within the

emissions constraints allowed by the regulatory agencies. Under this regulatory structure cumulative effects are not expected to occur.

(3) Caves

PC# 162: The Monument Plan should provide more information on how caves will be protected, evaluated, and used. --and--

PC# 163: The EIS should include a more thorough discussion of the impacts to caves from management activities. --and--

PC# 165: The EIS should show the relationship of the management strategies to the protection of cave resources.

Response: The cumulative effects of each alternative are discussed in Chapter IV. The Monument provides programmatic direction for managing the Monument, including goals for managing and protecting cave resources. The need for additional information regarding caves is recognized and addressed in the goals to locate, inventory, and classify caves within the Monument. Goals also include protection, public use, preservation, and study of caves and cave resources in concert with scientific, recreational, and volunteer groups (see the Management Goals sections of Chapter II of the FEIS).

Site-specific decisions regarding management of the Monument, including caves and cave resources will require site-specific analysis and public input before management activities can be implemented.

PC# 164: The EIS should address the conservation and potential management of caves as recreational areas.

Response: The Monument Plan provides programmatic direction for managing the Monument, including goals for managing and protecting cave resources. The management goals for all of the alternatives include protection, public use, preservation, and study of caves and cave resources in concert with scientific, recreational and volunteer groups (see the Management Goals sections of Chapter II of the FEIS).

PC# 166: The Monument Plan should distinguish between natural caves and man-made caves.

Response: The Monument plan addresses caves, which are natural. Other man made openings in the ground are not caves and will be managed on a case-by-case basis.

PC# 167: The EIS should consider designated caver campsites in its alternatives.

Response: The Monument Plan provides programmatic direction for managing the Monument, including goals for managing and protecting cave resources. The goals for all of the alternatives include protection, public use, preservation, and study of caves and cave resources in concert with scientific, recreational and volunteer groups (see the Management Goals section of Chapter II of this FEIS).

Site-specific decisions regarding management of the Monument, including caves, cave resources, and campgrounds, would require site-specific analysis and public input before management activities could be implemented.

(4) Fire and Fuels

PC# 5: The Forest Service should not use 2-acre gaps to regenerate sequoias. --and--

PC# 53: The Forest Service should not create patch cuts (gaps) as large as two acres as these will exacerbate fire danger.

Response: These gaps, whether created by prescribed fire or mechanically treatments followed by prescribed fire, would take many years to develop fuel characteristics that would result in moderate or high fire susceptibility. The treatments would alter the fuel condition in several ways: the fine fuels would be reduced, the understory density of small trees would be reduced, and crown fire potential would be reduced. The treated areas would also receive maintenance underburning to continue to keep fire susceptibility at desired levels. Also see the response to PC# 52.

PC# 17: The Forest Service should use a small diameter thinning program in heavily managed and altered stands away from communities and in community and home protection buffers as described in the document by the Center for Biological Diversity.

Response: With regard to home protection buffers on private lands, the Forest Service does not have the authority to make the public clear around their homes beyond state and county ordinance. The county and state fire departments are charged with enforcing state and county clearance ordinance (usually a 30-foot requirement). The CFBD document you refer to states “Rules of thumb recommend reducing crown cover to less than 35%.” This is less than what the Monument FEIS and Framework require for wildlife habitat retention. The CFBD document does not address fire behavior in forest fuels

other than conifers. Most fire managers can testify to spotting distances from brush during wildfire events in excess of 3/10 of a mile. This is also modeled using the BEHAVE fire spread model. Also see response to PCs 63 and 73.

PC# 42: The EIS should analyze the science that supports the contention that logging will decrease fire danger, severity, and intensity. --and--

PC# 192: The Forest Service should address the negative impacts of logging on fuels.

Response: The FEIS documents the effects of the proposed actions (including mechanical thinning) on the risk of catastrophic fire (see the Fire and Fuels section in Chapter IV). All alternatives propose some degree of mechanical treatments in conjunction with prescribed fire, and all alternatives reduce the risk of catastrophic fire. The Fire and Fuels section in Chapter III documents the existing fuel conditions and acknowledges the role of past logging on these conditions. Past logging on Forest Service and private lands has been primarily of the large overstory trees, accelerating growth in the dense understory and increasing landscape-level homogeneity of fuel structure (Weatherspoon, 1996; McKelvey and Johnston, 1992). Therefore, compared with pre-settlement [1875] conditions, the current Sierra Nevada forests are generally younger, denser, smaller in diameter, and more homogeneous (McKelvey, 1996). The FEIS proposes in some alternatives to thin the trees that have grown during the last 130 years. In areas where fire alone cannot be used to achieve desired conditions, mechanical thinning often proves to be a useful alternative (Weatherspoon, 1996)."

PC# 43: The Forest Service should analyze the previously recommended mechanical fuel treatments of chipping and chunking (coarse woody debris) and goatherd methods.

Response: When mechanical treatments are determined to be necessary, chipping is an alternative that would be allowed and considered, depending on the location of the proposed project and the selected alternative. Goat herding is not precluded from use on Monument lands as long as it is consistent with the management strategies and standards and guidelines for the selected alternative.

PC# 49: The Monument Plan should not call for a reduction in canopies.

Response: The predicted reductions in canopy cover are a result of the proposed treatment methods (prescribed fire or mechanical treatments) that are designed to effectively reduce the risk of

catastrophic fire and also establish new giant sequoia and pine trees. Canopy retention goals and standards and guidelines are established for some alternatives (see Chapter II) to ensure that desired canopy cover levels are retained.

PC# 52: The Forest Service should consider small-diameter thinning to achieve significant reductions in fire severity. --and--

PC# 191: The Forest Service should supply the science that supports the removal of 30" dbh trees.

Response: The smaller diameter conifers would be a focus of hazard reduction in the protection strategy for all alternatives. The data in the Giant Sequoia and Mixed Conifer section of Chapter III supports a 30-inch diameter limit to emphasize treatment of vegetation less than 130 years old. The hazard reduction treatments utilize prescribed fire and conifer thinning, leaving the largest trees fire ladder-free with adequate spacing to reduce crown torching.

PC# 54: The Forest Service should limit fuel reduction methods to prescribed fire, wildfire, and hand thinning treatments.

Response: The FEIS analyzes a range of alternatives (see Chapter II) that propose different treatment methods. For instance, Alternatives 3 and 4 greatly limit mechanical treatments and rely on prescribed fire with hand treatments as the primary methods for protection and restoration. Other alternatives provide more options to use mechanical methods where clearly needed.

PC# 55: The Monument Plan should follow the Framework in restoring a more natural fire regime.

Response: The Proposed Action (Alternative 2) in Chapter II describes the Framework strategy. The description notes that the Framework does not propose an explicit strategy for restoring a more natural fire regime. Other alternatives propose specific management strategies and standards and guidelines for restoration of a fire regime in fire-dependent ecosystems.

PC# 56: The Forest Service should not use prescribed fire alone for fuels reduction and restoration.

Response: Using prescribed burning alone will be analyzed for each protection or restoration project to determine its risks, effectiveness, and feasibility. Depending on site conditions, it may or may not be the appropriate treatment method to meet project objectives. Mechanical treatments may be clearly needed. The FEIS acknowledges that prescribed fire alone can be too risky for public safety and potentially

damaging to desired stand characteristics or to valuable resources such as sequoia groves or wildlife habitat. In Chapter II, the FEIS documents a range of alternatives that include different mixes of prescribed fire and mechanical treatments. Also see the response to PC# 55.

PC# 57: The Forest Service should plant native trees in brushy fire-prone openings created by past logging or fire.

Response: The FEIS allows for these types of treatments to occur. Restoration of plantations created by past logging is the top priority for treatments in Modified Alternative 6 and there is a management emphasis on the use of natural regeneration.

PC# 58: The Forest Service should use fire lookouts for monitoring prescribed and wildland fire use burns.

Response: Fire lookouts are staffed seasonally, and they are used to help monitor prescribed burns when they are staffed.

PC# 59: The Forest Service should focus on protecting those areas where forests and people come into contact.

Response: The completion of the protection treatments around communities is the top priority for implementation under all alternatives. Please see the Record of Decision.

PC# 60: The EIS should provide specific information about fuel loading and the different impacts of fuel load management.

Response: See the Fire and Fuels section in Chapter III of the FEIS, which discusses the fuel loading condition on the Monument. The Fire and Fuels section in Chapter IV documents the effects of the different alternatives on fuel loading.

PC# 61: The Forest Service should write an up-to-date Fire and Fuel Management Plan.

Response: The Sequoia National Forest has a recently approved Fire Management Plan (FMP) dated July 1, 2003. This plan formally documents the fire program approved through the Forest Plan as amended by the Framework. The FMP implements the decisions of these plans and associated Forest Service Manual direction.

PC# 62: The Forest Service should display how many acres were treated in the past decade, discuss the feasibility of proposed activities, and explain the costs for each treatment method.

Response: The number of acres treated in the past is not directly documented. Their effects are reflected in Chapter III, which discusses the existing condition of the Monument. All of the treatment methods proposed in the alternatives are proven and effective methods for fuels reduction and restoration treatments and are considered feasible. The specific costs of each treatment are not included in the FEIS. The estimated total cost of implementation for each alternative is documented in Chapter II, and these overall costs include the costs and estimated amounts of each treatment method.

PC# 63: The Forest Service should propose more aggressive fuels reduction for the protection of valuable resources and communities.

Response: The FEIS describes a range of alternative approaches to fuels reduction (see Chapter II) that are responsive to the need to protect communities and other resources. Alternative 6 provides a broad range of flexible treatment options, while other alternatives such as 3 and 4 provide more narrow options and smaller defense zones. The effects of these alternatives on protection are documented in the Fire and Fuels section in Chapter IV of the FEIS.

PC# 64: The Forest Service should explain why it continues to suppress natural fires.

Response: The discussion regarding the policy to suppress wildfires is beyond the scope of this FEIS. The Sequoia National Forest has a Fire Management Plan (dated July, 2003) that documents the conditions under which a land manager can allow a wildfire to burn rather than suppress it. There will continue to be conditions where, in order to protect important resources and/or life and property, natural fires will be suppressed.

PC# 65: The Forest Service should reconsider the analysis that concludes it is possible to meet both prescribed burning goals and air quality requirements.

Response: The FEIS proposes a range of alternatives, all of which are considered to be feasible in terms of balancing air quality requirements with the need to use prescribed fire. This determination of feasibility is based upon our best estimate of available burn days and other factors. The amount of treated acres will be monitored annually to ensure that adequate progress is being made towards full

implementation of the Monument Plan. Adjustments to the Monument Plan may need to be considered based upon monitoring results.

PC# 66: The Forest Service should use fuel treatments similar to those in a defense zone along roads and on key ridge tops.

Response: Currently the Monument has 23 miles of viable fuelbreaks, generally located along roads and key ridge tops. All Alternatives propose to continue to maintain the majority of these fuelbreaks with mechanical treatments and/or prescribed fire.

PC# 67: The Monument Plan should provide meaningful information about the impacts of alternatives on fire and fuels.

Response: Please the Fire and Fuels section of Chapter IV.

PC# 68: The Forest Service should implement defense zones and threat zones around the objects of interest.

Response: Chapter II of the FEIS provides a range of alternative approaches to protection of the objects of interest. Modified Alternative 6 includes explicit protection measures (SPLATs) for giant sequoia groves, as well as defense and threat zones for communities. Alternative 4 provides a distinctly different protection approach that de-emphasizes specific protection measures for resource values except for communities, developed recreation sites, special use sites, and other areas of concentrated human use.

PC# 69: The Forest Service should allow variability in the overall fuel arrangements and allow flexibility to treat as needed to meet forest structural restoration goals.

Response: Chapter II of the FEIS provides a range of alternative approaches to protection of the objects of interest and restoration of ecological conditions. Alternative 6 provides for the greatest amount of flexibility for treatments. Other alternatives provide different management strategies and standards and guidelines that reduce treatment flexibility in some areas.

PC# 70: The EIS should fully divulge and analyze contrary scientific opinion and data with respect to fire behavior and logging.

Response: The FEIS discusses the best available information regarding fire behavior in Chapter II. Chapter IV discusses the effects of the proposed treatments, including those related to mechanical treatments and thinnings.

PC# 71: The Forest Service should reduce fire threat by reducing access.

Response: Public access in the form of roads and trails can lead to increased wildfire ignitions. However, areas with limited access have proven to be more resistant to control due to limited access for firefighters. The recent McNally wildfire suppression operation demonstrated how firefighters make progress in areas with road access and less progress in those areas with little or no road access.

PC# 72: The Forest Service should monitor to determine if excessive mortality occurs during burning.

Response: The Forest Service will monitor projects and utilize adaptive management strategies ensuring the best management practices are applied. Appendix G documents the monitoring strategy.

PC# 73: The Forest Service should use its own science which finds that logging activities are the main cause of fire risk and severity. --and--

PC# 196: The Forest Service should take a critical look at thinning options.

Response: The Giant Sequoia and Mixed Conifer section in Chapter III discusses the role of past logging as it has affected current fuel loading. The alternatives propose a range of treatment methods (including thinning) and associated standards and guidelines. The Fire and Fuels section in Chapter IV documents that the proposed treatments would reduce both fire risk and severity.

PC# 74: The EIS should disclose that maintenance of fuelbreaks would be required and consider the impacts of this on the ecosystems, especially from toxicants such as herbicides.

Response: Chapter II discusses that all areas will continue to be maintained to move toward desired conditions. These areas include the existing fuelbreaks. Chapter IV of the FEIS acknowledges these effects. There are no proposals in any alternatives to use herbicides. Any such project proposal in the future would be evaluated in a site-specific NEPA analysis and decision.

PC# 75: The EIS should address the size of SPLATs.

Response: The FEIS references Appendix A of the Framework ROD, page A-12. Strategically placed area treatments (SPLATs) are blocks of land, ranging from 50 to over 1,000 acres, where the vegetation has been treated to reduce fuel loading.

PC# 76: The Forest Service should show the necessity to conduct aggressive fuel reduction methods when recent fire history is beneficial or benign.

Response: The determination of restoration treatments after a wildfire must be made on a site-specific basis, as each fire is unique in its effects and long-term needs for restoring the ecosystems. After the McNally wildfire, the Sequoia Forest conducted a landscape analysis to identified areas where the fire had created needs for fuel reduction to avoid adverse long-term effects. For example, in the mixed conifer forest within the McNally wildfire area, almost 50,000 acres was rated moderate and high fire severity and long-term fuel loading from the dead conifers would be well outside the historical range of variability.

PC# 77: The EIS should explain why old logged areas are identified as low fire susceptibility and ancient stands are shown as high fire susceptibility.

Response: Most of the plantations received fuel reduction treatments prior to planting. Like a wildfire area, it takes several years for the re-growth to have fuel characteristics that would result in moderate or high fire susceptibility. The treated plantations along the Parker Loop road on the Hot Springs Ranger District are good examples of low fire susceptibly. “Ancient” stands are commonly moderate or high susceptibility because they have accumulated heavy fuel loadings and have high densities of small understory trees due to a lack of frequent fires.

PC# 78: The Forest Service should show why the buildup of fuels is considered excessive.

Response: The FEIS documents the adverse effects of the buildup of fuels over many decades. These adverse effects include a risk of catastrophic fire and a lack of regeneration of shade-intolerant trees such as giant sequoias and pines. See the Fire and Fuels and Giant Sequoia and Mixed Conifer sections in Chapter III of the FEIS.

PC# 79: The Monument Plan should not include a fire suppression strategy.

Response: The FEIS does not propose a fire suppression strategy. The belief that fire is a missing element within the ecosystem has led to the Wildland and Prescribed Fire Management Policy of 1995. Based on that policy and the Fire Management Plan (July, 2003), management actions on wildland fires will no longer be driven by fire type designation. Fires will no longer be extinguished under a default response but will be suppressed for specific reasons. The specific rationale for fires that are managed for resource benefits are identified

in the Fire Management Plan. The Fire Management Plan formally documents the fire program approved through the Forest Plan as amended by the Framework.

PC# 80: The Forest Service should demonstrate the need for or efficacy of wildland urban fuel reduction zones.

Response: The Fire and Fuels section in Chapter III discusses the risk to communities from the areas of moderate and high fire susceptibility and the need to reduce this risk to protect communities and other areas of important resource values such as giant sequoia groves and wildlife habitat. The FEIS also uses direction from the Framework for protection projects in the wildland urban intermix. The Fire and Fuels section in Chapter IV discusses the relative effectiveness of each alternative's protection strategy in reducing the risk of catastrophic fire.

PC# 81: The Forest Service should consider following the fire and fuels policy of the national parks.

Response: Fire and fuels management strategies similar to those used in the Sequoia and Kings Canyon National Parks are proposed in Alternative 3.

PC# 82: The Forest Service should reduce fire risk by methods other than building more roads or proposing more logging.

Response: The FEIS does not propose building any new roads for hazard fuel reduction activities. Prescribed fire is the preferred method for vegetation treatments (see the ROD).

PC# 83: The Monument Plan should emphasize fuels reduction to meet protection and restoration goals in Management Area ZOI-NG.

Response: The goals and management emphases in Management Area ZOI-NG include restoration of a more natural fire regime with frequent, low intensity fires. Fuel reductions are an element of returning to these conditions. In Modified Alternative 6, a portion of area north and east of the Tule River Indian Reservation is included in grove SPLATs. These additional treatments will help the area meet fuel reduction, protection, and some restoration goals. Scientific research will focus on the potential impacts of management and human use on giant sequoia ecology, restoration, and protection.

PC# 84: The Monument Plan should place high priority on fuels reduction along the boundaries with Mountain Home Demonstration State Forest.

Response: The Map Packet includes a Fire Susceptibility Map, which shows the State Forest is surrounded by moderate and high susceptibility areas. These areas are the primary focuses of fuels reduction work in all alternatives.

PC# 85: The Forest Service should reduce heat and dryness in forests.

Response: The management goals for lands and vegetation in the Monument are described in Chapter II. There are no goals for either reducing or increasing heat or dryness in forests.

PC# 86: The Forest Service should show the scientific basis for setting the "pre-fire-exclusion" date at around 1875.

Response: Please see Appendix C, Advisory III.

PC# 87: The Forest Service should disclose more information on the McNally Fire.

Response: Most of the McNally Fire occurred outside of the Monument (16,800 acres in the Monument out of a total 151,000 acres burned). Chapter III of the FEIS discusses existing conditions and, where appropriate to specific resources, the effects of the McNally Fire are discussed. For example, the acres of susceptibility were corrected to reflect the areas burned in the fire. Additional information about the fire can be obtained from the “McNally Fire Landscape Analysis” and the “McNally Burned Area Emergency Rehabilitation Report”.

PC# 88: The EIS should state how it would prevent cut areas from becoming more prone to fire.

Response: The areas that are treated to reduce fire susceptibility or to restore a natural fire regime will be treated again at frequent intervals to help ensure that susceptibility to catastrophic wildfires continues to meet desired conditions.

PC# 89: The Forest Service should not use prescribed burns.

Response: In order to progress towards the desired conditions and re-introduce fire to the ecosystem (as discussed in the Proclamation), the use of prescribed fire is an essential tool. Without this tool, wildfire is the only other approach to allow fire to return to the ecosystem, and

wildfire clearly can have effects that are not acceptable (i.e., destroyed communities and wildlife habitat).

PC# 90: The Monument Plan should state how the Forest Service would keep prescribed fires under control.

Response: The Forest Service requires that all prescribed burns have a Burn Plan before the burn can be implemented. The Burn Plan is prepared and approved by the responsible line officer (typically the District Ranger). This Burn Plan includes: 1) the required burn conditions, 2) required preparation and precautionary treatments (such as hand line construction, falling of snags to protect personnel and minimize spotting potential), 3) ensuring that fully qualified and trained personnel carry out the operation, 4) mop-up requirements to ensure that the fire is extinguished after resource objectives are met, and 5) contingency planning to ensure that personnel and equipment are available in the event that immediate suppression action is necessary because of an escape or change in burning conditions.

PC# 102: The Forest Service should make SPLATs a priority.

Response: In each alternative that proposes the use of SPLATs, the SPLATs are second only to defense zones in priority for implementation and they are a critical part of the overall protection strategy. See the ROD for further discussion of implementation priorities.

PC# 103: The Forest Service should only disturb land immediately adjacent to endangered private property to control fire.

Response: The Purpose and Need in Chapter I of the FEIS includes reducing the risk of catastrophic fire and restoring ecosystems across the entire Monument. In order to meet the Purpose and Need, treatments are recommended for all areas, not just those immediately adjacent to private property.

PC# 104: The Monument Plan should not have a diameter limit in defense zones.

Response: The Giant Sequoia and Mixed Conifer section in Chapter III documents the rationale for a 30-inch diameter limit. Our analysis indicates that there is not a need to remove trees greater than 30 inches in order to meet desired conditions in defense zones. The alternatives propose a range of diameter limits. For example, Alternative 3 does not have a diameter limit, and the vegetation that needs to be removed for fire protection is based upon site-specific analysis.

PC# 105: The Forest Service should not exaggerate the risk of catastrophic fire to open more lands to logging.

Response: The FEIS objectively quantifies the risk of catastrophic fire (see the Fire and Fuels section in Chapter III). In Modified Alternative 6, fire is the first treatment method to be considered to treat vegetation. Mechanical methods or the cutting of trees would only be used if clearly needed for ecological restoration or public safety.

PC# 106: The EIS should provide for the protection of natural features of special value (objects of interest) during prescribed fire.

Response: Please see the response to PC# 68. Standards and guidelines are proposed to protect special features within treatment areas, such as key wildlife features (see Appendix A of the ROD). The Forest Service will use standards and guidelines, use best management practices, and mitigate hazards to ensure public safety and protect the objects of interest.

PC# 107: The Forest Service should test the efficacy of SPLATs.

Response: See the Fire and Fuels section (Spot Fire Potential) in Chapter III of the FEIS. The analysis was conducted to determine the effectiveness of prescriptions in reducing the potential for spot fires in sensitive areas such as communities, defense zones, and giant sequoia groves. Results of the spot fire analysis indicate that, without SPLATs, the defense zones are less effective.

PC# 108: The Forest Service should create defense zones of only 200 feet and not cut any trees larger than 15 or 16 inches dbh.

Response: A range of alternative protection strategies was proposed (see Chapter II). The Fire and Fuels section in Chapter IV documents the effects of these different approaches. The ROD describes the rationale for selecting defense zones larger than 200 feet. The Giant Sequoia and Mixed Conifer section in Chapter IV gives the rationale for a 30-inch diameter limit. Also see the response to PC# 107.

PC# 109: The Forest Service should vary the treatment zones according to local needs.

Response: See the description of alternatives in Chapter II and the Fire and Fuels section (Wildland Urban Interface) in Chapter III of the FEIS. Under all alternatives except Alternative 4, the defense zones can be locally determined based on site-specific project analysis of topographic features and predicted fire behavior.

PC# 110: The Forest Service should acknowledge that it is not obligated nor does it have the ability to guarantee the protection of property in-holdings.

Response: The Forest Service does not claim this authority. The Forest Service can and does work cooperatively with private landowners on protection strategies, with the work on public lands directed by the Forest Service. Forest Service Manual 5103 – POLICY, Item 4, states: "Observe these fire management priorities on all fires: first, ensure firefighter and public safety; and, second, protect property and natural and cultural resources based on the relative values to be protected."

PC# 111: The Monument Plan should place high priority on fuels treatments along the boundary with the Tule River Indian Reservation.

Response: The Map Packet includes a Fire Susceptibility map, which shows that the Tule River Indian Reservation is surrounded by moderate and high susceptibility areas on national forest lands. These areas are the primary focuses of fuels reduction work in all alternatives.

PC# 112: The Forest Service should develop a series of DFPZs as described by SNEP.

Response: The alternatives do not describe Defensible Fuel Profile Zones (DFPZs) as specific treatment approaches. The alternatives propose defense and threat zone approaches to reduce the risk of catastrophic fire and protect the objects of interest. DFPZs may be considered in a site-specific project if the design is consistent with the management direction and standards and guidelines in the selected alternative.

PC# 113: The Forest Service should avoid any changes that might reduce current fire suppression capabilities.

Response: No changes are proposed that would reduce current fire suppression capabilities.

PC# 114: The Forest Service should define what it is designating as "communities" to be protected with defense and threat zones.

Response: See Designating the Defense Zone (page A-46) in Appendix A of the Framework ROD. The wildland urban intermix zone is shown on the Modified Alternative 8 map included with the Framework FEIS. While this map displays an approximate location for defense zones, each national forest is responsible for locally

delineating the actual boundaries of its defense zones. Defense zones extend approximately ¼-mile from areas with a high density (approximately one structure per 5 acres) of residences, commercial buildings, and administrative sites with facilities.

PC# 115: The Forest Service should work with residents and property owners to reduce fire hazard in interface areas.

Response: The Sequoia National Forest works closely with local fire safe councils and homeowner associations to inform the public of opportunities to work with local government and federal agencies to reduce fire hazards in their communities.

PC# 116: The EIS should display how much (%) of a reduction in fire susceptibility would occur in treated areas.

Response: See the Fire and Fuels section in Chapter IV of the FEIS. The critical effect is the reduced fire behavior associated with reduced susceptibility. All the acres within defense zones would effectively be reduced to low fire susceptibility after treatment. Approximately 50% of the acres in SPLATs would be reduced to low fire susceptibility.

PC# 117: The Forest Service should control noxious weeds in areas of controlled burns.

Response: The Giant Sequoia and Mixed Conifer section in Chapter IV acknowledges the risk of any treatment method to introduce noxious weeds and acknowledges the uncertainty that exists about different treatment methods. The selected alternative includes standards and guidelines requiring that all site-specific project analyses include a noxious weed assessment. See the ROD for this FEIS, the Noxious Weeds and Invasive Non-native Plants section (page 25) in the Framework ROD, and Part 3.6 in Chapter 3 of the Framework FEIS.

PC# 118: The Forest Service should treat the fuels outside any gaps created in the groves.

Response: Gap creation (openings generally ¼-acre to 2 acres in size) would be included in and a part of a broader fuels reduction or ecological restoration treatment area. This broader area would be treated to meet fuel objectives if the area is in moderate or high susceptibility or there is a need to restore fire.

PC# 119: The EIS should disclose that there are giant sequoias that have experienced no fire in 2,000 years.

Response: There are many research papers providing hard evidence that sequoia trees across the Monument have experienced frequent fire on a regular basis prior to the current fire-exclusion era (Swetnam, 1992). The Forest Service does not have specific information on all large giant sequoias and there may be individuals that have not been exposed to fire during their lifetime.

PC# 120: The EIS should explain why prescribed fire would create gaps larger in size and greater in frequency than desired.

Response: Based on formal advice from the Scientific Advisory Board (see Appendix C, Advisory XXIV), the FEIS revises the desired conditions from the DEIS to acknowledge the uncertainty regarding the desired frequency of gaps. More information is needed in this area and gap frequency is no longer used as an indicator of whether alternative proposals are moving toward desired conditions. In regard to gap size, those alternatives that use prescribed fire alone to create gaps are likely to do so with less predictable results than those using prescribed fire in conjunction with mechanical treatments. Experience has shown on the Sequoia National Forest and adjacent national parks that prescribed fires do create gaps larger than 2 acres. The large number of acres that need treatment under every alternative, in conjunction with a limited burn window to treat stands, often requires a burning prescription that is considered “hot,” in that fire behavior can be more intense under these conditions than under cooler and wetter conditions. With hot prescriptions comes the uncertainty of predicting mortality levels and regulating the lethal heat dose applied to a given stand to promote desired tree mortality. Given the inherent level of uncertainty with prescribed fire use alone, the gap size would likely vary widely on both sides of the desired condition. The monitoring plan provides a tracking method to determine the desired size and frequency of gaps as implementation occurs. As these data accrue, management strategies will be adapted based on new scientific findings.

(5) Geology and Soils

PC# 39a: The EIS should adequately address the potential effects of soil compaction.

Response: The forest will comply with the Framework and implement the Region 5 Soil Quality Standards on all Giant Sequoia Monument and Forest lands. These standards were developed to protect soil productivity.

The effects of soil compaction from management activities on Monument resources are documented in Chapter IV of the FEIS. The Record of Decision acknowledges the extent and scope of these impacts on the environment.

PC# 150: The Forest Service should have more soil scientists on staff, have more complete soil mapping, and use these soil surveys in ongoing management.

Response: Thank you for your support in recognizing the importance soil scientists bring to the Sequoia National Forest Monument. The Sierra National Forest provided support to the Monument Team by assigning their soil scientist as support for this effort.

PC# 151: The EIS should discuss the effects of fire on soils.

Response: The effects of fire on soils are considered in the Framework. This FEIS follows the direction established in the Framework and as such incorporates the implementation of Region 5 Soil Quality Standards to all projects that may follow from this EIS.

PC# 152: The EIS should analyze the impact of grazing on soils.

Response: The effect of grazing on soils is considered in detail in the Framework. The Monument Plan will follow the direction the Framework provides for grazing to minimize effects on soils.

(6) Forest Vegetation

PC# 31: The Monument Plan should ensure that the forest is resilient and stable by maintaining diversity of species and considering environmental factors (climate, insects, drought).

Response: The FEIS describes a range of alternatives (Chapter II of the FEIS), all of which have as a goal the establishment and retention of a range of both shade-tolerant and shade-intolerant species (such as pines and giant sequoias). The FEIS proposes a range of management strategies to meet this goal. Chapter III documents the effects changing climate, air quality, drought, and pests might have on a more resilient forest.

PC# 32: The Forest Service should approach gap creation cautiously and use adaptive management and monitoring to learn more about it.

Response: Modified Alternative 6 acknowledges the uncertainty surrounding the creation of gaps mechanically to promote sequoia

regeneration (see the Giant Sequoia and Mixed Conifer section in Chapter III of the FEIS). All alternatives acknowledge the existing body of information that documents the effectiveness of prescribed fire to create gaps (Chapter II of the FEIS). Areas of study associated with mechanical gap creation are identified in Appendix G as part of the proposed scientific study and research.

PC# 34: The Forest Service should use existing information regarding the effects of mechanical tree removal versus prescribed burning in gap creation.

Response: The FEIS (see the Giant Sequoia and Mixed Conifer section in Chapter III of the FEIS) acknowledges that the uncertainty surrounding the mechanical creation of gaps lies in the understanding of long-term ecological effects associated with restoration of important structures and processes as compared to pre-1875 conditions. Much of the current understanding of logging effects is focused on long-term timber production, which was the primary purpose for which the plantations were created. The FEIS documents the effects of mechanical removal of trees on the range of resources, and much of this information is based upon observations from past logging practices in the forest.

PC# 35: The Monument Plan should display the distribution of trees per acres by size class.

Response: This broad display of information is not specific enough to support the decisions to be made. More specific information is displayed in the Giant Sequoia and Mixed Conifer section of Chapter III. These displays focus on different vegetation types and the status of different ecological structural components and processes. This information is more applicable to the management strategies and effects analyses.

PC# 36: The Monument Plan should more adequately describe the existing conditions (especially wildlife habitat, fuels conditions, and growth rates) that are a result of past logging practices.

Response: Existing conditions are described in the Chapter III of the FEIS. The FEIS acknowledges that much of these conditions are associated with past logging practices.

PC# 104: The Forest Service should modify its desired conditions to be less prescriptive and definitive because not enough is known about pre-1875 stand conditions.

Response: This comment was echoed by the Scientific Advisory Board (Appendix C, Advisory III). The desired conditions in the FEIS now focus on restoring the key process of fire (in fire-dependent ecosystems), on reducing fuels and stand densities in the trees that are less than 130 years old, and on encouraging the establishment of young giant sequoia trees. These conditions are less definitive and prescriptive than those in the DEIS. The FEIS also more clearly acknowledges the uncertainty regarding forest conditions of the past.

PC# 107: The Forest Service should focus on the obliteration of plantations that were established for the purpose of timber production.

Response: Modified Alternative 6 describes a restoration strategy that focuses on restoring plantations to natural conditions (see the Modified Alternative 6 section in Chapter II). Plantation restoration is a priority treatment for the first two decades of plan implementation under this alternative.

(a) Giant Sequoia

PC# 44: The Forest Service should protect all older trees (>150 years). The DEIS (page III-58, figure III-7) indicates that there are too many of the older trees, implying that your intentions are to cut these trees.

Response: The alternatives in the FEIS (Chapter II) provide standards and guidelines that limit the size of trees that can be cut for protection or restoration purposes. The size limits range from 12 to 30 inches in diameter. According to inventory information, trees less than 30 inches are almost all less than 150 years old. The table from the DEIS is not included in the FEIS, as we agree it was misleading and it is not our goal or intention to reduce the amount of these trees. Our goal is to reduce the risk of unnaturally severe wildfires and to encourage the establishment of new giant sequoias and other shade-intolerant species such as pines and oaks.

PC# 46: The Monument Plan should call for a complete giant sequoia inventory.

Response: The currently available information is sufficient for the decision-maker to make an informed decision and is fully documented in Chapter III of the FEIS. The amount of additional inventory information that is needed for site-specific projects will be determined

during landscape and site-specific project analyses. The amount of additional information will be dependent upon the nature, scope, and objectives of each proposed project, as well as the quantity and quality of existing information.

PC# 47: The Forest Service should acknowledge and consider the management practices of the adjacent national parks and Mountain Home State Forest.

Response: Alternative 3 proposes management practices that are similar to those of the Sequoia and Kings Canyon National Parks (see the description of Alternative 3 in Chapter II). The FEIS discusses the monitoring results of these national parks relative to species composition changes and tree densities in the Giant Sequoia and Mixed Conifer section of Chapter IV. Also, during a field trip with the Scientific Advisory Board (Board) to the Mountain Home State Forest, information was presented to the Board regarding the general status of giant sequoias under the management of the State of California. At the beginning of management, there were approximately 5,000 large giant sequoia trees. There is now still approximately the same number of large trees (they are protected from removal), and there are significant amounts of young giant sequoias now growing. These results indicate that the management strategy employed by the state forest, which includes mechanical harvesting and removal, has led to successful regeneration of giant sequoias. The alternatives described in Chapter II of the FEIS provide a range of management strategies to consider, from the use of prescribed fire only to a mix of treatment methods that includes mechanical thinning.

PC# 48: The Forest Service should acknowledge that past logging in the forest has led to unnaturally large openings and a failure to regenerate giant sequoias, while the use of prescribed fire alone has led to successful regeneration. --and--

PC# 109: The Forest Service should acknowledge the failure of past openings created by logging and the success of openings created by prescribed fire in regenerating giant sequoias.

Response: The FEIS documents the effects of past harvesting on the establishment of giant sequoia (see the Giant Sequoia and Mixed Conifer section in Chapter III). The past harvesting and associated fuels treatments have led to successful sequoia regeneration. These results are clearly evident in the Converse Grove that was logged near the turn of the 20th century, as well as in logging done in other groves in the mid-1980s. Successful sequoia regeneration has resulted from both natural seeding and planted seedlings. The FEIS acknowledges that the openings created by past logging are larger than desired conditions (see the Giant Sequoia and Mixed Conifer section in

Chapter III). Desired openings would most frequently be between ¼-acre and 2 acres in size. The openings created by the logging of the 1980s, though they are generally well stocked now with young giant sequoias and other mixed conifer species, averaged 5 to 10 acres in size.

There are some areas of successful regeneration in giant sequoia groves following treatments of prescribed fire alone. However, not all prescribed burns were successful in establishing giant sequoia regeneration. Advisory IV from the Board states: "Fire often is a useful tool for restoring giant sequoia groves and other fire-adapted ecosystems (Hardy and Amo, 1996; Stephenson, 1996,1999). However, issues such as human safety, air quality, water quality, endangered species, cumulative impacts with other management actions, current and desired forest structure, and current fuel loads mean that fire alone cannot always be used to achieve desired forest conditions (Weatherspoon, 1996; Fule et al, 1997; Piirto and Rogers, 1999). In areas where fire alone cannot be used to achieve desired conditions, mechanical thinning often proves to be a useful alternative (Weatherspoon, 1996) (Appendix C, Advisory IV)."

PC# 50: The Forest Service should rely on the Giant Sequoia Ecology Cooperative to develop definitions of grove influence zones and desired conditions.

Response: The Forest Service used a team of scientists to develop a report that defined the zones of influence for giant sequoia groves. This team had representatives from three of the members of the Giant Sequoia Ecology Cooperative. The draft report was circulated to all members of the Cooperative for peer review. The desired conditions were developed in draft form by the Forest Service and were circulated for public review and comments. These desired conditions were also reviewed and commented on by the Scientific Advisory Board.

PC# 110: The Forest Service should not use the Piirto & Rogers paper ("An Ecological Foundation for Management of National Forest Giant Sequoia Ecosystems") as the basis for desired conditions. The DEIS applies it in too prescriptive a manner and it should not apply to every grove.

Response: The FEIS uses these conditions only as a reference set of conditions upon which it compares the effects of different alternatives. The conditions are not intended to be specific target conditions. A portion of this concern is validated by the Scientific Advisory Board, which stated in Advisory XXIV (see Appendix C) that there is too much uncertainty surrounding the desired frequency of gaps to justify using the recommended range of management variability as described in

the DEIS. Hence, the indicator of gap frequency is not used in the FEIS to compare effects of the different alternatives. The FEIS does not state that these vegetative structural components need to be found in each grove. The FEIS also clearly describes the range of conditions that are found in the groves (see the Giant Sequoia and Mixed Conifer section in Chapter III).

PC# 111: The Forest Service should more clearly and accurately describe the unique conditions of each grove. For example, Landslide Grove is categorized as not having any young sequoias, when in fact this is not true. This mischaracterization of grove conditions could lead to inappropriate management.

Response: The FEIS acknowledges that grove conditions vary widely (see the Giant Sequoia and Mixed Conifer section in Chapter III). The purpose of the grove groups as delineated is to provide an overview of the range of conditions rather than to paint a grove-specific picture. By describing the range of conditions, the reader is better able to understand the scope of the need for action (protection and restoration) and the range of management strategies that are proposed in the alternatives to address the purpose and need. The FEIS and ROD acknowledge that landscape and site-specific project analyses are required to identify specific grove conditions and needed protection and restoration objectives. Any site-specific project proposal will have an associated environmental analysis and decision that addresses the unique conditions of the groves and surrounding landscape within the project area.

(7) Range

PC# 40C: The Monument Plan should reduce the impacts resulting from grazing in the Monument.

Response: The presidential proclamation establishing the Monument specifically allowed grazing except where it adversely affects the "objects of interest". We believe we will meet that goal by following the standards and guidelines for grazing developed in the Framework. The standards and guidelines for grazing are designed to protect riparian habitat and limit impacts to other resources. It is unlikely that livestock would contribute to extreme fire behavior under current grazing patterns.

PC# 41C: The Monument Plan should incorporate Standards and Guidelines for grazing from the Framework.

Response: The Monument Plan will follow the Framework grazing standards (see the Standards and Guidelines sections in Chapter II, and Appendix A of the ROD).

PC# 42C: The Monument Plan should not impact grazing in the Monument.

Response: The management direction for grazing would remain the same in all alternatives except Alternative 3, where grazing would be eliminated in the giant sequoia groves.

PC# 4C: The Monument Plan should assure that site-specific analyses of grazing effects are completed.

Response: Site-specific analysis of grazing allotments is mandated by the 1995 rescission rider and should be completed by 2010.

PC# 212: The EIS should require adequate monitoring to analyze the impacts of grazing.

Response: Monitoring in the Monument incorporates the Framework monitoring. This provides consistency in the gathering of data and the analysis of results across a larger scale landscape. No specific monitoring was suggested that adds significantly to information already gathered. Management of cultural sites within grazing allotments is addressed in an agreement with the State Historical Preservation Office.

(8) Rare Plants

PC# 105: The Monument Plan should ensure that the forest is resilient and stable by maintaining diversity of species and considering environmental factors (climate, insects, and drought). Disturbance from fire and/or mechanical means might reduce diversity and create conditions favorable to noxious weeds.

Response: Discussion on the threat of noxious weeds and their control has been added to Chapters III and IV of the FEIS. Fundamentally, the management of noxious weeds in the Monument follows direction from the Framework.

PC# 168: The EIS should provide information on plants specific to the Monument and species-specific discussions of their condition, trend, or management needs.

Response: Greater detail regarding plants has been added to the FEIS (see the Rare Plants and Noxious Weeds sections of Chapter III).

PC# 169: The EIS should discuss the impacts to the viability of native plants from proposed management activities. --and--

PC# 170: The EIS should contain a cumulative impacts analysis for rare plants.

Response: The Monument Management Plan tiers to the Framework for the effects of management activities on rare plants and only addresses those actions specific to the Monument Plan. Cumulative effects are addressed where effects are negative. The action alternatives stress the protection of known populations and the re-introduction of the natural fire regimes with which native plants evolved. Since no treatments are proposed within known populations unless they would benefit the rare plant species, there would be no cumulative negative effects.

(9) Watershed

PC #194: The Forest Service should address the negative impacts of logging on watershed resources.

Response: Impacts to watershed resources are discussed in the Watershed section of Chapter IV of the FEIS.

(a) Fisheries/Aquatic Habitat

PC# 153: The EIS should acknowledge if herbicides would be used and discuss the impacts of those wind-transported herbicides on amphibians.

Response: The Monument Plan does not propose the use of herbicides, thus analysis of possible effects from their use is outside the scope of this EIS. Should herbicide use be considered in the future, possible effects on amphibians would be analyzed specific to a proposed project.

PC# 154: The EIS should provide standards and guidelines for protecting riparian habitats. --and--

PC# 155: The Monument Plan should accelerate the recovery of riparian and aquatic habitat from historic impacts and minimize impacts from recent and continuing activities. --and--

PC# 156: The Forest Service should stop the loss of habitat for frog and toad species, as well as species up the food chain, which is due to logging. --and--

PC# 161: The EIS should consider an alternative that applies standard riparian widths on steeper slopes.

Response: The Riparian Conservation Objectives (RCOs) identified in the Framework provide direction to minimize the effects of past, present, and continuing activities on the riparian and aquatic habitat resources. The Monument Plan will implement the RCOs developed in the Framework. In all alternatives, site-specific riparian conservation areas would be developed at the project level, which would provide necessary protection for steeper drainages.

PC# 157: The Monument Plan should consider entire watersheds in analyzing any impacts to the ecosystem.

Response: Ecosystem analysis as identified in the Framework provides the direction to consider projects on a watershed basis. The Framework directs each forest to consider conditions at the river basin level, watershed level, landscape level, and project level to consider impacts to ecosystems.

PC# 158: The EIS should discuss the adverse impacts to the aquatic system from roads.

Response: The Sequoia National Forest performed a roads analysis and included the findings in the FEIS (see Appendices E and F). One of the factors used in the analysis was the adverse impact of roads that were within close proximity to riparian areas, as well as the number of road crossings. Based on this analysis, recommendations for further treatment were provided. Decommissioning of roads would occur at the project level where a more site-specific analysis would be performed.

PC# 159: The EIS should note that the California golden trout has been proposed for listing as endangered. --and--

PC# 160: The EIS should correct its information on the mountain yellow-legged frog and California golden trout.

Response: The California golden trout is a subspecies of rainbow trout that is native only to the Kern River drainage. The trout is endemic to two watersheds in the Sierra Nevada: the Golden Trout Creek drainage and the South Fork of the Kern River drainage. Both drainages are in the Golden Trout Wilderness, part of the Inyo and Sequoia National Forests in Tulare County. The species has experienced a decline in its range as a result of hybridization with introduced rainbow trout and competition with introduced brown trout. Genetic studies have shown that fish in several streams (within both watersheds) show some level of hybridization. Habitat for the fish has also been affected by livestock overgrazing.

In response to a petition to list the California golden trout as endangered, The U.S. Fish and Wildlife Service (USFWS) has completed a 90-day finding determination that there is substantial evidence to list the California golden trout as endangered. The USFWS will next complete a 12-month review to decide whether or not to propose the California golden trout for listing as threatened or endangered. An endangered species is one that is in danger of extinction throughout all or a significant portion of its range. A threatened species is one that is likely to become endangered within the foreseeable future. The 12-month finding considers information regarding historic and current distribution, biology and ecology, ongoing conservation measures for the species and its habitat, and threats to the species and its habitat. At the end of the 12-month review, the USFWS will determine whether listing is "not warranted," "warranted" or "warranted but precluded" based on other higher priority species. The USFWS is currently working with the California Department of Fish and Game and the Forest Service on updating and refining a 1999 conservation strategy for the trout. Effective conservation measures in place at the time of the 12-month finding could reduce or prevent the need to list the species.

For information on the mountain yellow-legged frog, please see the Wildlife section in Chapter III of the FEIS.

(10) Wildlife

PC# 121: The EIS should analyze the negative impacts on songbirds, pileated woodpeckers, and other species that live in old forest areas.

Response: The discussion of these species has been expanded in the Wildlife section in Chapter IV of the FEIS.

PC# 122: The Forest Service should provide large, uninterrupted landscapes for the long-term survival of native species.

Response: Large, uninterrupted landscapes are provided by the two-thirds of the Sequoia National Forest in wilderness areas, roadless areas, and other undeveloped allocations. In addition, large sections in the adjacent national parks are managed for similar attributes. Large sections of the Monument are managed to make them compatible with species that need large, uninterrupted blocks of habitat.

PC# 123: The Forest Service should recruit snags to serve as habitat for primary cavity nesters.

Response: When viewed at a landscape scale, snag recruitment should not be necessary. It may be used as a tool in specific areas of high habitat value or where management activities reduce snags below desired levels. For instance, snag densities may not meet optimum wildlife levels in the more open areas within wildland urban intermix zones, particularly in defense zones. These areas would be dominated by more open stands (40% crown cover) with lower snag densities, to reduce the risk of long-range fire spotting, resistance to control, and the rate of spread of fires in these zones. Within the Monument, less than 10% of the woodland and forested habitat would be treated to optimize human safety and protection of property. Over two-thirds of the Sequoia National Forest is wilderness, roadless, or other allocations where snag levels are adequate.

PC# 124: The Monument Plan should minimize adverse impacts on wildlife habitat and work to improve that habitat.

Response: The Monument Plan minimizes adverse effects on wildlife except where human safety and threat to private property are dominant in the wildland urban intermix zones. In these areas wildlife values are still provided but are not maximized. No new roads are proposed for vegetation treatments. Estimates of new road construction to access recreation facilities range from 4.2 to 6.4 miles.

PC# 125: The Forest Service should protect and restore springs and seeps, biological hotspots that are critical sources of water to wildlife.

Response: There are provisions in the Framework to protect sensitive aquatic and riparian features. These guidelines and riparian conservation objectives are carried forward into the Monument Plan.

PC# 126: The Forest Service should consider that the wildlife is adapted to the conditions in which they live now and that any radical change will place them in jeopardy.

Response: The Monument Plan does not propose radical changes to wildlife habitat. The effects of the different alternatives on wildlife habitat can be found in the Wildlife section of Chapter IV. None of the alternatives would be expected to place species at risk or create conditions outside of the natural range of variability under which the species evolved.

PC# 127: The Monument Plan should display and describe the canopy cover retention requirements.

Response: Canopy cover retention requirements are displayed in the Wildlife section in Chapter II, and in Appendix D.

PC# 128: The EIS should address issues related to impacts on management indicator species and species at risk.

Response: Impacts to MIS has been expanded in the FEIS (see the Wildlife section of Chapter IV).

PC# 129: The Forest Service should ban hunting.

Response: Hunting is beyond the scope of the Monument Plan. National forests, unlike national parks, are managed under concurrent jurisdiction with the state. The Forest Service is responsible for managing the habitat and the state is responsible for managing wildlife populations, including setting hunting regulations. The Proclamation states: “Nothing in this proclamation shall be deemed to diminish or enlarge the jurisdiction of the State of California with respect to fish and wildlife management (Appendix B).”

PC# 130: The EIS should provide an adequate description of the current habitat conditions, population size, and distribution of wildlife species such as the Pacific fisher and spotted owl.

PC# 131: The EIS should include an analysis of cumulative impacts on wildlife.

Response: This information has been expanded in the Wildlife section in Chapter IV of the FEIS.

PC# 132: The EIS should discuss impacts to squirrels.

Response: Western gray squirrels are identified as management indicator species for oak woodland (see the Wildlife section in Chapter III of the FEIS). There would be little effect on oaks or primary habitat for gray squirrels, but more detail has been added to the FEIS (see the Wildlife section in Chapter IV).

PC# 133: The Forest Service should relocate animals before prescribed burning in the area.

Response: Most wildlife in the Sierra Nevada evolved with fire. They have developed mechanisms of their own for flight or protection from moderate fire typical of most natural conditions and prescribed fire. Most species are at the greatest risk from fast-moving and explosive wildfire. It isn't necessary or practical to relocate all wildlife prior to prescribed fire or mechanical treatments. Not all wildlife will escape or be protected but the majority will. Studies on fire effects on wildlife usually show a greater number and diversity of wildlife within a year or two of a typical moderate to low-intensity fire.

PC# 134: The Monument Plan should restrict personal-use fuelwood gathering to trees less than 10" dbh to save larger trees for habitat.

Response: This is not necessary. Personal use fire wood gathering is generally limited to roads or easily accessible areas and is currently limited to down wood or dead trees less than 15" at the base. The area affected is relatively small and associated with roads or other locations where reductions in fuel are desired and the need for additional down wood for wildlife habitat is generally low.

PC# 135: The Forest Service should disclose how timber harvests, roads, and other land-disturbing activities reduce habitat.

Response: Several respondents equated thinning for restoration and fuels reduction with clearcutting, and cited literature on the effects of

clearcutting. Thinning for fuels reduction and restoration are considerably different from clearcutting and have vastly different effects and objectives. Restoration and fuels reduction thinning are generally thinnings of smaller, understory trees. This leaves the larger trees to maintain canopy closure (generally a minimum of 40% or more) and large tree characteristics. This approach leaves the stands less vulnerable to catastrophic wildfire, disease, and insect attack while significantly increasing growth. The result is higher canopy closure, multiple layered stands, and much larger trees over time. There are still resource trade-offs, since some wildlife benefit from more open stands and larger trees while others may prefer dense forests. Analysis and discussion of these tradeoffs has been expanded in the FEIS (see the Wildlife section in Chapter IV).

PC# 136: The Monument Plan should strengthen the Framework standards and guidelines, not weaken them. --and--

PC# 203: The Monument Plan should provide more protection for species than the Framework.

Response: The FEIS proposes a range of management alternatives, including varying levels and methods of wildlife and habitat protection. Some alternatives provide more restrictive standards and guidelines than the Framework, while others do not. The alternatives are discussed in Chapter II and the potential effects are discussed in Chapter IV.

PC# 190: The Forest Service should supply the science that supports the removal of 30" diameter trees. --and--

PC# 15C: The Forest Service should allow cutting of trees up to 30" in diameter to enhance the survival of giant sequoias.

Response: The reasoning for the 30-inch diameter limit is discussed in the Giant Sequoia and Mixed Conifer section in Chapter III of the FEIS.

(a) Late Seral Old Growth (LSOG)

PC# 137: The Forest Service should explain how wildlife would survive reductions in suitable habitat for old growth dependent species.

Response: The discussion and analysis of proposed management activities in LSOG habitats has been expanded in the Wildlife section in Chapter IV of the FEIS

PC# 138: The Forest Service should acknowledge that past logging practices have brought many old-forest dependent species to the edge of extinction. --and--

PC# 193: The Forest Service should address the negative impacts of logging.

Response: Logging and its effects are a complicated issue with many facets and factors specific to a given historic era. There is disagreement within the scientific community and in scientific literature over the scope and nature of the effects of logging. We do not agree that logging, even in old forest, has necessarily led species to the edge of extinction.

Turn of the century logging appeared to have had only the objective of extraction of resources, with no thought to future generations. These actions produced large scars on the land and did indeed push many species to the brink of local extinction. Now, however, 80 to 100 years later, these sites of massive destruction of habitat are or appear to be highly productive sites for breeding goshawk, fisher, and spotted owl. Examples are Big Stump at the entrance station to Kings Canyon National Park, Indian Basin, and Converse Basin. Some of these areas were identified in the Monument Plan for study and interpretation, so that we might learn both from mistakes and of the resilience of nature.

Logging in the 1950s to 1980s was still focused on the most economic and efficient way to extract resources, but with an eye toward replanting and providing for a long-term sustained yield of timber and other resources. During that period, nearly one billion board feet of timber were harvested from the Hot Springs and Tule River Ranger Districts. These ranger districts now contain the highest density of fisher in the Sierra Nevada. According to the CASPO Technical Report, the Hot Springs Ranger District has an area with one of the highest densities of spotted owl detections in the State of California. Most of the logged area of the forest still supports spotted owls and fisher, due in part to the small size of past clearcutting units and the retention of a matrix of forest habitat. This is in contrast to large portions of the Red Mountain, McGee, Stormy, McNally, Manter, and other large stand-replacing fires where few trees exist over large areas. Many of these areas where the McGee Fire burned still do not have natural regeneration of trees even after 50 or more years.

To avoid or reduce the area covered by this type of large stand-replacing and habitat destroying wildfire, to provide a mosaic of age classes including young giant sequoia, and to provide for defense of rural communities, the Monument Plan proposes a mix of treatments using fire and mechanical methods. Fire will be the method of choice

but, where risk is too great, mechanical methods may be used. There is no objective or target to produce timber, but timber may be produced and sold as a by-product and thus be used to help support ecological restoration and maintenance or public safety projects.

Past logging effects are addressed in the cumulative effects discussed in the Wildlife section of Chapter IV. Activities proposed in the Monument will accelerate the restoration of stands to large multi-layered forest with moderate to dense canopy closure. To equate past logging to contemporary logging or restoration treatments in the Monument Plan is therefore inappropriate.

PC# 139: The EIS should acknowledge the uncertainties in modeling projections of old forest conditions.

Response: Please see the Modeling section in Chapter II, the Assumptions section in Chapter IV, and Appendix H for discussions of the computer modeling used, including assumptions and uncertainties.

PC# 140: The Monument Plan should include a decision tool for when to remove trees 20" dbh or larger to assure the potential for recruitment of large trees. --and--

PC# 35C: The Forest Service should explain how trees to be removed will be selected.

Response: A flow chart is included in the ROD (see Figure 1) to help determine when use of fire alone will not move an area toward desired conditions and when mechanical treatment or tree removal is clearly needed.

PC# 141: The Forest Service should point out that the Sierra Nevada Ecosystem Project old growth information is inaccurate.

Response: Local information was used to describe existing conditions in the Monument and to predict the effects of alternative management proposals.

PC# 142: The Forest Service should include specific information on LSOG that will allow better comparison of the alternatives.

Response: A description of the assumptions and limitations of modeling LSOG attributes has been added to the Wildlife section in Chapter IV of the FEIS.

PC# 143: The Forest Service should explain how degrading over 30,000 acres of suitable fisher habitat each decade wouldn't push the fisher to extinction.

Response: Fisher habitat would be affected by activities to restore natural processes and provide for protection of urban areas within the monument. The Wildlife section in Chapter IV of the FEIS provides greater detail. Modified Alternative 6 would use a more cautious approach to management within high quality fisher habitat. Note also that the 30,000 acres is not eliminated as suitable habitat. Please also see the response to PC# 138 above.

(b) Biodiversity

PC# 144: The Forest Service should strengthen biodiversity protection by preserving and enlarging habitat.

Response: We believe we are doing just that. Under all alternatives, habitat for wildlife that requires large, dense trees would increase over time. This is a result of thinning, by prescribed fire or mechanical methods followed by fire, which would make the stands more resilient to stand-replacing wildfire and reduce loss of habitat. Over most of he Monument there are provisions for protection of high numbers of snags and high volumes of down logs.

(c) Threatened, Sensitive, and Endangered Species

PC# 145: The Forest Service should make provisions for the re-introduction of the California condor.

Response: The decision on the re-introduction of condor to the Monument will be made by the California Condor Recovery Team and the USFWS. Suitable lands within the Monument are managed in a manner compatible with continued use by condor.

PC# 146: The Forest Service should protect fisher habitat.

Response: The Forest Service recognizes the need to protect fisher habitat. Greater detail and expanded guidelines have been added to Modified Alternative 6 (see Chapter II) to ensure sound management of fisher habitat.

PC# 147: The Forest Service should protect spotted owl habitat.

Response: All alternatives in this FEIS incorporate protections for spotted owls. Please see Chapter II for a description of management

direction by alternative and the Wildlife section in Chapter IV of the FEIS for a discussion of effects.

PC# 148: The Forest Service should study how high intensity fire contributes to wildlife populations and forest dynamics.

Response: The discussion in the DEIS mostly addressed the issue of catastrophic stand-replacing fire versus light underburns where it is expected that there will be some variation and occasional torching of small patches. Discussion of effects on wildlife of variation in fire intensity has expanded in the Wildlife section in Chapter IV of the FEIS.

PC# 149: The Forest Service should wait until the U.S. Fish and Wildlife Service has determined if the California spotted owl, Pacific fisher, and American marten are to be listed and how their habitats are to be protected.

Response: The intent of national forest and monument management is to manage these species and their habitat such that listing will not be necessary. If they are listed, they will be managed under the Biological Opinion that the USFWS issues in order to ensure habitat protection.

(11) Human Use and Public Safety

PC# 179: The EIS should define public safety and justify why fuel reduction treatments are needed to provide for it.

Response: Public safety includes a wide range of subjects including protection from fire, falling limbs and trees; safe roads; exposure to biological contaminants in campgrounds; and water safety. For example, fuel reduction projects may be implemented for safety in wildland urban intermix zones to reduce the probability of catastrophic fire destroying a community. Descriptions and effects are described in the Fire and Fuels sections of Chapters III and IV of the FEIS.

PC# 180: The Monument Plan should commit to locating a manned visitors center in the southern portion of the Monument.

Response: Additional discussion of local communities and their relationship to recreation in the Monument is included in the Recreation sections of Chapters III and IV of the FEIS. In conformance with Forest Service policy, the Monument Plan does not include plans to develop a visitor center within the Monument.

PC# 181: The Forest Service should only remove trees when they pose a danger to public safety.

Response: As stated in the Proclamation, “Removal of trees, except for personal use fuel wood, from within the monument area may take place only if clearly needed for ecological restoration and maintenance or public safety.” The ROD includes a flow chart (see Figure 1) to help determine what methods are best suited for vegetation management and to determine when tree removal is “clearly needed” for the reasons stated in the Proclamation.

PC# 182: The Monument Plan should include the process the Forest Service will use to mitigate any danger to visitors from trees.

Response: There is existing policy and regulation regarding protection of the public from hazards, including hazardous trees and branches. The existing policy and regulation will be followed to protect the public from hazards within the Monument. No additional direction is proposed in the Monument Plan.

PC# 183: The Forest Service should restrict human "encroachment" by posting more warning signs and imposing fines and penalties.

Response: The Monument Plan provides programmatic direction for managing the resources of the Monument, including recreation and human access. The Proclamation states: “The plan will provide for and encourage continued public and recreational access and use consistent with the purposes of the monument.” The alternative goals, strategies, and effects of recreation and human use in the Monument are discussed in Chapters I, II, III, and IV of the FEIS.

PC# 184: The Forest Service should continue personal use firewood programs.

Response: As stated in the Proclamation, “Removal of trees, except for personal use fuel wood, from within the monument area may take place only if clearly needed for ecological restoration and maintenance or public safety.” The Monument Plan follows this direction from the Proclamation. Personal use firewood gathering will continue.

PC# 186: The EIS should analyze the forest areas that will be closed to tourism and recreation during logging, as well as the public safety risks from logging trucks on forest

Response: The Monument Plan provides programmatic direction for managing the resources of the Monument. Tourism and recreational

use of the Monument might be affected by project management activities such as prescribed fire, mechanical treatment of vegetation, logging, or construction or rehabilitation of campgrounds, trails or roads. Impacts to public safety from these activities will be analyzed during site-specific project analysis and appropriate safety measures will be implemented for specific projects.

PC# 187: The EIS should discuss special use authorizations and their impact on the Monument.

Response: The Proclamation states: "Nothing in the proclamation shall be deemed to affect special use authorizations; existing uses shall be governed by applicable laws, regulations, and management plans." No additional direction is proposed in the Monument Plan. Existing and future special use authorizations will be evaluated on a case-by-case basis according to existing laws, regulations, and management plans.

PC# 188: The Forest Service should adopt the Recreation/Human Use strategy for Alternative 3.

Response: The Proclamation states: "The plan will provide for and encourage continued public and recreational access and use consistent with the purposes of the monument." The goals, strategies, and effects of recreation and human use in the Monument are discussed in Chapters I, II, III and IV of the FEIS, including those for Alternative 3. The decision regarding which alternative is selected can be found in the ROD.

PC# 189: The Monument Plan should characterize the Kern River Valley as the southern gateway to the Monument.

Response: Additional discussion of local communities and their relationship to recreation in the Monument is included in the Recreation sections of Chapters III and IV of the FEIS.

(a) Heritage Resources

PC# 175: The Monument Plan should provide leadership in heritage resource management by addressing the importance of fire lookouts in its management strategies.

Response: Meaningful historic preservation is not a cost, but an investment in our future. It provides tangible economic, social, educational, and cultural benefits. The Forest Service will work with our public and private partners to identify and plan constructive use for federal historic properties.

PC# 176: The Forest Service should leave cultural sites undisturbed by logging. --and--

PC# 177: The Forest Service should identify and protect "Indian bathtubs" or "granite basins" as cultural, historic, geologic, or archaeological resources. --and--

PC# 178: The Monument Plan should recognize other areas of the Monument as important to the history of firefighting and sheep grazing.

Response: The Forest Service will ensure that historic properties which may be affected by any undertaking are identified and evaluated in accordance with 36 CFR Part 800 and follow the procedures established. The Forest Service will ensure that site-specific project surveys and other efforts to identify and evaluate historic properties are conducted in accordance with appropriate professional and regulatory standards.

(b) Tribal Rights and Interests

PC# 10: The Forest Service should protect tribal uses and gain tribal input on continuing management.

Response: The Forest Service has been in consultation with the Tule River Indian Tribe since the project began. Meetings have occurred between the Forest Service and the Tribal Council before any new developments or release of documents. Tribal employees have consulted on the FEIS and offered information to the planning team. Other tribes in the area have been kept in touch as the Monument Plan has been developed. The Management Goals section (Common to All Action Alternatives) in Chapter II of the FEIS presents the common goal “Consult with the Tule River Indian Tribal Council and confer with other Native American communities in the planning of projects in the Monument. Ensure access to culturally important sites and resources for use by Native Americans.” This relationship with the local tribes and bands of Native Americans will continue throughout the implementation of projects in the Monument.

(12) Recreation

PC# 2: The Monument Plan should not increase recreation sites. --and--

PC# 9: The EIS should review and evaluate dispersed and developed recreation in concert with forest restoration and management activities to ensure a well-integrated EIS that will address all impacts of management.

Response: Monument recreation programs are managed to protect the objects of interests and allow public visitors to enjoy the many features of the varied landscapes. We strive to sustain ecosystems and serve people by providing quality recreation experiences, settings, and partnerships in order to meet the needs of present and future generations. By managing the natural resource setting, and the activities that occur within it, we provide the opportunities for recreation experiences to take place.

This FEIS analyzes, in Chapter IV, the effects of the proposed recreation program on the other resources found within the monument. This evaluation addresses the impacts of forest users on the land as well as the range of desired experiences of the visitor. Desired experiences are defined in terms of the evidence of the sights and sounds of human activity, as well as the type and amount of facilities provided.

PC# 3: Recreation opportunities in the Monument should be designed for the enjoyment of all visitors.

Response: We believe we have provided for the widest range of recreation preferences and opportunities for people of all economic and physical abilities. Modified Alternative 6 proposes enhanced recreation opportunities for activities found to be in greatest demand. In this alternative, we have recognized the public desire for opportunities to enjoy the many types of recreation, social, and spiritual values of the Monument. For example, the alternative describes potential improvements in day hiking, camping, visiting historic areas, nature study/wildlife viewing, fishing, driving/sightseeing, and picnicking, to name those with the greatest demand.

In the Hume Lake and Converse Basin areas, interpretive programs and displays of historical artifacts, self-guided nature trails, and amphitheaters for nature education would be possible. Increased camping opportunities would enable individuals to experience “living in the forest,” added picnic facilities would allow day users places to

relax and enjoy the surrounding landscapes, and conversion of old road beds into pedestrian, equestrian, and/or mountain bike trails would encourage a greater dispersion of low impact uses throughout the Monument.

See the Recreation section in Chapter IV for a discussion about use of the Monument by persons with disabilities. See PC# 9 for additional information.

PC# 4: The Forest Service should protect access in the Monument and not close any roads or trails.

Response: The Presidential Proclamation says, "The plan will provide for and encourage continued public and recreational access and use consistent with the purpose of the monument." Public access by road and trail will continue. However, the level of access varies by alternative as described in Chapter II. Implementation of any road closure proposed in the alternatives would require full public disclosure as part of a site-specific analysis.

PC# 5: The Monument Plan should define a carrying capacity and present current use data.

Response: No attempt has been made to define a carrying capacity for the Monument. Current estimates of recreation use are discussed in the Recreation section in Chapter III of the FEIS. A process is in place to standardize the method for calculating visitor use. The Sequoia National Forest is using the National Visitor Use Monitoring survey to collect data on recreation visitation.

PC# 6: The Monument Plan should avoid visitor facilities within the Monument and use partnerships to enhance visitor services.

Response: The type and amount of new recreation facilities recommended varies by alternative. Some alternatives propose increases in overnight facilities, including in sequoia groves, while other alternatives limit new development. All alternatives include a goal to improve visitor facilities and services in cooperation with local governments, agencies, and the business community. The selected alternative is discussed at length in the ROD.

PC# 7: The Forest Service should place any new facilities along existing roads to reduce the need for new roads and should place signs on trails to show motorized vehicles are illegal.

Response: All system trails in the Monument have signs showing what uses are allowed and that motorized vehicles are prohibited. The alternatives described in Chapter II of the FEIS emphasize location of

new recreation facilities along existing roads, minimizing the amount of new roads that would be built. When identified through site-specific project analysis and public comment, existing roads would be converted to trails or obliterated.

PC# 8: The Monument Plan should emphasize forest integrity over tourist accommodations.

Response: In describing this Monument Plan, the Proclamation said, "The plan will provide for and encourage continued public and recreational access and use consistent with the purpose of the monument". A range of alternatives to balance public use with ecological restoration and protection are considered in the FEIS (Chapter II). The selected alternative is discussed in the ROD.

PC# 113: The EIS should discuss the dominant intangible qualities of the groves that must be protected.

Response: The intangible values of the giant sequoia groves are discussed in the Desired Condition section of Chapter II and in the Scenic Environment section of Chapter III.

PC# 195: The Forest Service should address the negative impacts of logging on such non-economic values as recreation and the wilderness experience.

Response: The Proclamation states, "No portion of the monument shall be considered to be suited for timber production, and no part of the monument shall be used in a calculation or provision of a sustained yield of timber from the Sequoia National Forest. Removal of trees, except for personal use firewood, from within the monument area may take place only if clearly needed for ecological restoration and maintenance or public safety."

Given the constraints of the Proclamation, no long-term negative impacts to the recreation resource are foreseen from proposed management activities. See the Scenic Environment section of Chapter IV for a discussion of the potential positive and negative impacts of the removal of trees and prescribed burning.

(a) Special Designations

PC# 12: The Monument Plan should maintain wilderness and roadless areas within the Monument.

Response: Portions of two designated wildernesses, Golden Trout and Monarch, encompassing nearly 13,900 acres, are located within

Monument boundaries. In those areas, this plan would maintain the characteristics of the National Wilderness Preservation System as defined by the Wilderness Act of 1964.

The Roadless Area Conservation Final Rule prohibits new road construction and reconstruction in inventoried roadless areas. It also prohibits the cutting, sale, and removal of timber in those areas except in certain cases for improving wildlife habitat for threatened and endangered species and maintaining and restoring healthy ecosystems. All inventoried roadless areas within the Monument are managed under this rule. If the Rule is suspended as the result of litigation, interim rules will be followed as directed by the Chief of the Forest Service.

PC# 13: The Monument Plan should expand the scenic byways program.

Response: We hope to do just that. All alternatives in the Monument Plan would study Highway 190, the Western Divide Highway, and the Parker Pass Corridor (M50) for inclusion in the Scenic Byways System.

PC# 14: The Monument Plan should discuss the legal implications of having the Kings River Special Management Area within the Monument.

Response: The following is found in the Recreation section of Chapter III: "About 24,000 acres of the Kings River Special Management Area are located within the northern portion of the Monument, adjacent to the Kings River. This special management area was created by Public Law 100-150 in 1987 to provide for public outdoor recreation use and enjoyment; protection of the natural, archeological, and scenic resources; and for fish and wildlife management. This public law permits off-highway vehicular use on trails to the same extent and in the same location as was permitted before enactment. This statute takes precedence over the Presidential Proclamation that created the Monument and prohibits off-highway vehicles from driving off of designated roads. Therefore, within that portion of the special management area located within the Monument, off-highway vehicle use may still occur on about 20 miles of trails."

(b) OHV

PC# 214: The Monument Plan should limit OHV use to designated roads. --and--

PC# 215: The Monument Plan should eliminate all OHV/OSV use. --and--

PC# 216: The Monument Plan should clearly state that the Monument is closed to OHV/OSV use "except on roads marked as open. --and--

PC# 217: The Monument Plan should allow no open riding.

Response: The Monument Plan follows the direction of the Proclamation. Roads designated for OHV/OSV use are signed and enforced. Neither off-highway vehicles nor snowmobiles are allowed off roads, except in the Kings River Special Management Area. See the response to PC# 14 above.

PC# 218: The Monument Plan should contain a motor vehicle plan to determine which roads shall be designated for OHV/OSV use.

Response: Roads designated for motorized vehicle use, including OHV use, were designated in January 2001. Alternative 3 would not allow OHV/OSV use outside the Kings River Special Management Area. Site-specific decisions would be made on whether to open new roads to motorized use or close ones that are currently designated.

PC# 219: The Monument Plan should only designate roads for OHV/OSV use that can be adequately monitored and enforced.

Response: Monitoring and enforcement of public activities, including OHV/OSV use, is an integral component of managing the Monument lands. Monument managers have the authority to eliminate use if unacceptable impacts occur.

PC# 220: The Monument Plan should allow OHV use in some areas of the Monument.

Response: OHV use would be allowed on low standard roads in all alternatives except Alternative 3 (see description in Chapter II). Use of OHVs would be allowed in the Kings River Special Management Area in all alternatives (see the Recreation section in Chapter III of the FEIS). The final decision on OHV use is in the ROD.

PC# 221: The Monument Plan should accommodate over-snow use by street legal vehicles.

Response: Use of street legal vehicles on snow-covered roads is not precluded in any alternative. This type of activity will continue to be evaluated through the special use process and authorized where appropriate.

(c) Trails

PC# 15: The Forest Service should provide adequate funding for roads, trails, and trailhead maintenance in roadless and wilderness areas in the Monument.

Response: This request is beyond the scope of this document; Congress appropriates funding. This plan only displays the estimated funding which would be required to complete the proposed activities.

PC# 16: The Forest Service should add to the hiking and non-motorized trail network in the Monument.

Response: See the Management Emphases (Common to All Action Alternatives) section in Chapter II of the FEIS for potential projects that would add mileage to the hiking and non-motorized trail network.

PC# 17: The Forest Service should provide well-maintained, marked, mapped, and safe trails that don't harm resources.

Response: We agree. Management direction in the Monument Plan reflects this. Ranger district personnel have marked trails throughout the Monument to prohibit illegal off-highway vehicle use and to notify the visitor what is permitted on trails.

PC# 18: The Monument Plan should designate areas for non-motorized winter use.

Response: All alternatives allow for snow play areas for non-motorized winter recreation. Such uses are not restricted in the Monument. In Alternative 3, no OHV/OSV use would be allowed in the Monument. As demand increases, opportunities for additional sites will be considered with appropriate environmental documentation prior to implementation. Motorized vehicles, including snowmobiles, are not allowed off roads.

(13) Scenic Environment

PC# 106: The Monument Plan should use smaller gaps for aesthetic reasons.

Response: Small openings, or gaps, in the forest canopy are a natural and desirable feature in conifer stands in the Monument. Creating gaps to encourage regeneration of sequoia, oak, and pine trees is an expected outcome in all alternatives. The goal is to create gaps that are irregularly shaped and average one acre in size, ranging from ¼-acre to 2 acres in size. Openings smaller than this do not meet the needs of sun-loving species such as sequoias, oaks, and pines.

The Forest Service uses the Scenic Management System as a systemic approach to the inventory and analysis of scenery. Through the use of this system, aesthetics of the site will be considered during site-specific project analysis.

PC# 108: The Forest Service should not create gaps solely to provide vistas.

Response: Gaps are created to promote regeneration. The creation of vistas to view special features of the Monument is not associated with gap creation for restoration and regeneration.

PC# 171: The Monument Plan should protect ecosystems from alterations by man.

Response: The Presidential Proclamation is clear, that the objects of interest will be protected. The giant sequoias and their surrounding ecosystems are included.

PC# 172: The Monument Plan should preserve the "wilderness condition" in some groves.

Response: All or part of six sequoia groves are located within congressionally designated wilderness areas in the Monument. These groves would be managed according to the regulations governing wilderness areas that prohibit use of motorized equipment and roads. Groves outside of wilderness areas may receive a range of treatments, including no action, depending on the site characteristics of the grove.

PC# 173: The EIS should contain a comparison of the impacts to scenic quality from the different alternatives. --and--

PC# 174: The EIS should contain a cumulative impacts analysis for scenic resources.

Response: Chapter IV documents the effects of all action alternatives on the scenic resources. All alternatives would meet the scenic integrity levels as defined in the planning documents. The variations in the alternatives would not create significant differences in scenic quality.

(14) Socio-Economics

PC# 13: The Forest Service should expand the discussion of economics to include other uses of the national forest, besides logging, that create jobs.

Response: Please refer to the sections on Socio-Economics in Chapters III and IV for a full discussion of the various job-creating effects of Monument visitation and management.

PC# 14: The Forest Service should not artificially subsidize the logging industry.

Response: There is no question of “artificially subsidizing” the logging industry through logging in the Monument. The alternatives propose varying amounts of mechanical treatments that may include logging as a tool for protection and restoration management, as well as for human hazard abatement in some narrowly defined circumstances. Any logs produced would be incidental to ecological restoration and maintenance or public safety in the Monument. The Proclamation clearly prohibits logging solely for the purpose of producing a commercial timber product.

PC# 91: The Forest Service should allow wood products to be removed and used for the public good, to protect and restore the Monument.

PC# 92: The Forest Service should help support local industry and local economies by engaging the local sawmill to remove the heavy fuels from the Monument. --and--

PC# 4B: The Forest Service should allow logging in the Monument.

Response: The Proclamation makes it clear that our responsibility is to protect the objects of interest as specified in that document. While supporting the local timber industry and economy are not objectives of Monument management, such management yields local economic effects. The local timber industry could be engaged to harvest trees incidental to the treatment of fuels or other ecological restoration and maintenance or public safety activities. This is discussed fully in the Socio-Economics section of Chapter IV.

PC #: 93: The Forest Service should serve economic needs by saving the trees and promoting tourism.

Response: The Proclamation makes clear that our responsibility is to protect the objects of interest, which include the giant sequoia groves and their ecosystems. While serving economic needs is not an objective of Monument management, there are clearly economic consequences, tourism among them. These are discussed in the Socio-Economics section of Chapter IV.

PC# 94: The Forest Service should explore the possibility of partnerships to create markets and disposal facilities for the millions of tons of biomass that need to be removed.

Response: While this may be a good idea, it is beyond the scope of this EIS.

PC# 95: The Forest Service should portray the social values issue more broadly, including more of both sides of the issue.

Response: While we understand that there may be opinions in addition to the social effects analyzed in the Socio-Economics section of Chapter IV, that discussion focuses, as the NEPA process requires, on the social issue developed during the scoping process. In doing so, the relevant range of social effects is presented for the Monument Plan.

PC# 96: The Monument Plan should analyze the negative impacts resulting from the closure of a sawmill.

Response: Since the local sawmill is drawing timber from out of state, absent supporting facts it is not reasonable to speculate that the amount of timber produced as a by-product of ecological restoration and maintenance or public safety activities in the Monument would make the crucial difference in the mill's survival. Language suggesting this might be so has been removed from the text of the EIS.

PC# 98: The Forest Service should press for scientific restoration, not cave in to the environmental movement on sound environmental matters.

Response: We believe we have made the case for scientifically based restoration of the Monument's objects of interest and have made a decision that, while based on sound science, also provides for the expansion of scientific knowledge through research, monitoring, and the adaptive management process. The expansion of science will allow us to press ahead in the future with additional restoration activities, all based on science and subject to the NEPA process.

PC# 100: The Forest Service should encourage competition to the one major sawmill.

Response: This is beyond the scope of the Monument Plan.

PC# 101: The EIS should not consider socio-economics in the alternatives.

Response: Socio-economic concerns were considered only as effects of implementing the alternatives. The NEPA (40 CFR 1508.8) specifies that by definition the kinds of effects to be considered in an environmental document include "…ecological…aesthetic, historic, cultural, economic, social,…" Thus, in order to comply with the NEPA, we are obligated to evaluate, when applicable, the social and economic effects of our land and resource management actions. This is clearly a case where such effects occur; therefore they are analyzed and disclosed.

(15) Mechanical Treatments

PC# 2: The public should have regulations to keep loggers from taking more than is designated in a gap.

Response: All work conducted by private contractors is done according to strict contract regulations that are written by the Forest

Service. The Forest Service provides tight specifications that contractors must comply with, and the Forest Service retains full control over tree removal by contractors. Forest Service inspectors are on-site and regularly conduct inspections of contractor work to ensure strict compliance with contract specifications. In the event of a breach of contract specifications, the Forest Service has the authority to suspend or fully stop contract operations and to pursue legal actions commensurate with violations of the contract.

PC# 3: The Forest Service should follow the National Fire Plan of 2000, which states to "…not rely on commercial logging or new road building to reduce the fire risks." --and--

PC# 4a: The Forest Service should emphasize the natural process of fire in the Monument rather than road building and increased timber cutting.

Response: The selected alternative emphasizes the use of fire for vegetation treatments to meet and maintain desired conditions (see the Management Goals and Standards and Guidelines sections for Modified Alternative 6 in Chapter II of the FEIS). The use of mechanical methods is acceptable only after a clear determination that fire will not meet management objectives (see Figure 1 in the ROD). Road building would generally be limited to only those that are needed for new or relocated recreation or administrative facilities.

PC# 6a: The Monument Plan should propose only the removal of trees no more than 12" in diameter.

Response: A 12-inch diameter limit for tree removal was analyzed in Alternative 4. Any tree removal must be clearly needed for ecological restoration and maintenance or public safety (see the Proclamation in Appendix B). This analysis process does not consider the possibility or likelihood of a commercial timber sale in reaching a final determination of whether or not mechanical treatment and tree removal are appropriate to meet project objectives.

PC# 6: The Forest Service should include a conversion factor to convert MMCF (million cubic feet) to MMBF (million board feet).

Response: The FEIS provides information on volume in both MMCF and MMBF.

PC# 7: The Forest Service should use prescribed burning and hand cutting of fire prone small trees for restoration, preservation, and fire suppression, rather than commercial and/or mechanical tree removal.

Response: The FEIS explores a range of alternatives that consider these approaches. The ROD documents the reasons that the selected alternative was chosen. This selected alternative best meets the purpose and need for action and is most responsive to all the issues. It includes the option of mechanical removal of trees and possible commercial use based upon further site-specific analysis.

PC# 8a: The Forest Service should only allow tree removal in the Monument if scientific data from an independent party concludes it is important for protection.

Response: Any determination that tree removal is necessary for ecological restoration and maintenance or public safety will be documented in a site-specific analysis and decision. This decision and the analysis that it is based upon will be subject to public review and comment. The Forest Service welcomes information from all sources during the project planning process; however Forest Service line officers are the final decision makers for projects on national forests.

PC# 8: The Forest Service should use logging for restoration and protection, along with prescribed fire and a let-burn policy for some wildfire, but only with a very careful project-level evaluation.

Response: The selected alternative provides for management flexibility to use a variety of treatment methods and emphasizes the use of prescribed fire. The ROD affirms the required site-specific project analyses to ensure that the recommended treatment methods are consistent with local conditions and project objectives. The Sequoia National Forest also has an approved Fire Management Plan that gives direction on wildland fire use.

PC# 9a: The Forest Service should protect all the small sequoias more than several inches in diameter since they may be the ones to survive millennia.

Response: The FEIS acknowledges the general lack of young sequoias in many groves; however, it also acknowledges that in specific groves there are areas where young sequoias are very abundant and that these trees may be at risk when exposed to prescribed fire. The risk from prescribed fire is due to existing thickets of trees and accumulated downed fuels that would burn too hot unless some trees are thinned out to make fire behavior and associated tree

mortality acceptable. Any decision to cut trees (of any species) would be made on a site-specific project basis that reflects local conditions and specific restoration or protection objectives.

PC# 9: The Forest Service should use an upper tree size removal limit of 20 inches in diameter. --and--

PC# 11a: The Forest Service should decide which trees to remove on a project-by-project basis, based on existing stands, not apply "blanket" maximum diameter limits.

Response: The FEIS proposes to use a 30-inch diameter as the upper limit for removal of trees for protection or restoration objectives. The 30-inch limit is based upon analysis of monument-specific inventory data and is tied to meeting restoration and protection objectives.

PC# 10a: The Forest Service should follow the consensus-driven Framework for monument management, not a policy of widespread logging.

Response: The selected alternative includes many of the management strategies from the Framework. New information and additional management strategies are included in the selected alternative in order to ensure proper care and management of the objects of interest, as the Framework does not specifically address the needs and opportunities identified in the Proclamation.

PC# 10: The Forest Service should not use the pre-1875 conditions as an automatic prescription throughout the Monument.

Response: The intent is not to use these conditions as explicit prescriptions, but rather as reference conditions. For example, the desired condition for a fire regime is simply to have more frequent and lower intensity fires and is not highly prescriptive in the specific fire return intervals. The desired fire return intervals are based upon scientific data and allow us to determine if we are moving towards a more frequent return interval as compared to the current situation.

PC# 11: The EIS should have a clear multi-decade plan for mechanical treatments for restoration and protection with data to rationalize it. --and--

PC# 48C: The EIS should describe what mechanical treatments will be used, to what extent, and with what consequences.

Response: The FEIS discusses the long-term protection and restoration strategies in the Management Strategies sections of Chapter II of the FEIS. It documents the projected program of accomplishment with the intent of treating all acres to meet protection and restoration goals (Table II-4). You are correct in that the DEIS did not clearly display potential acres and volumes beyond the first decade. This has been corrected in the FEIS, and potential acres and volumes are more fully discussed in the Giant Sequoia and Mixed Conifer sections of Chapter IV.

The FEIS describes and provides examples of the types of treatments that are commonly used to protect and restore ecosystems in the Treatments section in Chapter II. It also defines the prescriptions or types of treatments used in the computer modeling in Appendix H. The estimated amounts of treatments by alternative are displayed in Table II-4 in Chapter II, and the effects or consequences of proposed treatments are discussed in the Giant Sequoia and Mixed Conifer section of Chapter IV.

PC# 12: The Monument Plan should emphasize that shade-tolerant species would be the overwhelming majority of the trees removed during thinning, considering the deficit in sugar pine.

Response: The Monument Plan acknowledges the lack of shade-intolerant species such as pines and sequoias (see the Giant Sequoia and Mixed Conifer section of Chapter III). The desired conditions emphasize a need to reduce the overall density of the forest by reducing the amount of shade-tolerant species and increasing the shade-intolerant species. There is a management goal to increase the amount of shade-intolerant species (see the Management Goals section (Actions Common to All Action Alternatives) in Chapter II of the FEIS).

PC# 13a: The Forest Service should take a critical look at thinning options.

Response: The different alternatives provide a range of standards and guidelines that allow for a variety of thinning methods for different projects, depending upon local conditions and site-specific restoration or protection objectives. The effects analysis is documented in the FEIS (see the Giant Sequoia and Mixed Conifer section in Chapter IV)

as well as the Framework FEIS. Appendix H describes the variety of prescriptions that were used in different alternatives for different allocations. The Framework FEIS describes different maximum thinning constraints depending on specific allocations and alternative. For example, in Old Forest Emphasis Areas, thinning is generally limited to trees less than 12 inches in diameter. In the threat zone of the wildland urban intermix thinning up to 20 inches is generally permitted. The effects section also discusses, for the purpose of determining effects, the application of the most permissive thinning guidelines allowed in a particular allocation. By following this concept, the FEIS is assured of documenting the full range of potential effects.

PC# 14a: The Forest Service should include information justifying the permitted removal of trees as "clearly needed" for forest health.

Response: The FEIS acknowledges the complexity of site conditions (see the Giant Sequoia and Mixed Conifer section in Chapter III of the FEIS) that would influence a project-level decision to either remove or not remove trees. The alternatives provide a range of treatment methods that allow for the option of tree removal as long as a site-specific analysis and project-level decision make a finding of "clearly needed". The analysis tool (see Figure 1 in the ROD) will be used to provide a systematic approach for this analysis and decision.

PC# 16: The EIS should acknowledge or consider information regarding recent catastrophic fires (e.g., Los Alamos), and acknowledge the management practices in Mountain Home State Forest and Sequoia-Kings Canyon National Parks.

Response: No specific references are provided. The FEIS is based upon the most recent scientific research available. The FEIS does acknowledge the different management approaches of adjacent governmental agencies in the range of alternatives. The alternatives present a range of approaches (i.e., mechanical removal and logging, and prescribed fire) that are used in national parks or state forests.

PC# 17: The Monument Plan should display the portion of treatment costs that could be offset by the commercial value of material to be removed.

Response: The amount of material that might be available for removal is displayed in the Socio-Economic section of Chapter IV. These figures are displayed because of substantial public interest during the scoping period and are determined from outputs of computer-based modeling. The value of this material is not displayed because the amount of volume that might actually be removed from the Monument is highly dependent on future site-specific project

analyses and the associated determinations of whether or not removal is clearly needed for ecological restoration and maintenance or public safety (see Figure 1 in the ROD).

PC# 18a: The Forest Service should make small and medium-sized trees available for harvest to defray the high costs of restoring the Monument.

Response: The potential volume that might be available as a byproduct of ecological restoration and maintenance or public safety is displayed for each alternative in Table II-4 in Chapter II of the FEIS. Any decision to remove trees from the Monument would be made at a site-specific level with a project-level decision. The analysis tool (see Figure 1 in the ROD) will be used to provide a systematic approach for this analysis and decision.

PC# 18: The Forest Service should not arbitrarily limit the size of trees that can be cut because this would limit the ability of the agency to address the ecological restoration and protection needs in the Monument.

Response: The FEIS provides the scientific background behind the diameter limit in the Giant Sequoia and Mixed Conifer section in Chapter III.

PC# 19: The Forest Service should limit restoration efforts to plantations and other areas dominated by early seral stage vegetation.

Response: The FEIS describes the conditions of a wide variety of vegetation that are not consistent with the desired conditions, including plantations but also older stands where fuels buildup is extreme, stands are overly dense, or young trees are lacking. These conditions are documented in the Giant Sequoia and Mixed Conifer section in Chapter III. Modified Alternative 6 emphasizes the importance of restoring plantations by making them one of the highest priorities for treatment (see the alternative description in Chapter II). The ROD establishes plantations as the first priority for ecosystem restoration.

PC# 20: The Forest Service should remove all possibilities of economic incentive as stands are thinned by stipulating that all thinned trees/material would remain in the Monument.

Response: None of the alternatives stipulate that all thinned trees would remain in the Monument. The Proclamation and the direction found in this FEIS and ROD do not prohibit the removal of material, but they do stipulate that any removal of trees must be clearly needed

to meet ecological restoration purposes and maintenance or public safety purposes. This finding of "clearly needed" must be documented in a site-specific project analysis and decision.

PC# 21: The Monument Plan should include one alternative that applies the Alternative 6 approach in just one small section of the Monument, instead of the entire Monument.

Response: Alternatives 1, 2, 5, 6, and Modified 6 allow for a wide range of management practices, ranging from prescribed fire only to a combination of mechanical treatments and prescribed fire. The ROD provides direction that prescribed fire will be the preferred method of treatment and that the use of mechanical methods must be supported by a site-specific project analysis and decision. We believe that this requirement will ensure that a broad mix of management approaches will be applied, given the wide range of ecological and site conditions that exist in the Monument. By limiting the approach under Alternative 6 to only a small section of the Monument, it is unlikely that the goals of ecological restoration and reduction in risk of catastrophic fire will be met.

PC# 22: The Forest Service should supply the science that supports the removal of 30" diameter trees.

Response: The FEIS provides the data that supports the standard and guideline of a 30-inch diameter limit in the Giant Sequoia and Mixed Conifer section in Chapter III. The limit is based on both ecological restoration needs and protection needs. This limit is established for two important purposes: 1) to allow management flexibility in reducing the overly dense vegetation that has grown up since fire suppression and other human activities began to significantly alter ecological conditions (since approximately 1875 – see Appendix C, Advisory III) and 2) to allow management flexibility to reduce the risk of catastrophic fire, in particular the potential for crown fires.

PC# 23: The Forest Service should declare how it intends to treat the landscape after fires, including snag retention standards and marking guidelines.

Response: The Framework provides standards and guidelines for the treatment of areas that have been damaged by wildfire, including snag retention, soil protection, and downed woody debris. These standards and guidelines are dependent upon the allocation. For example, an area allocated to Old Forest Emphasis may have a different restoration approach than an area allocated to a wildland urban intermix zone for community protection. Because of these unique conditions, each landscape that is damaged would need a site-specific

analysis to identify the resources that have been damaged and the desired conditions that need to be restored. Based on this analysis, marking guidelines and other requirements would be developed that are responsive to the specific needs of the damaged landscape. Mortality guidelines such as those developed by Sheri Smith would need to be developed based on the landscape analysis. For an example of allocation-specific standards and guidelines from the Framework, see Appendix A of the Framework ROD.

PC# 24: The Forest Service should not remove trees from the Monument without a site-specific project-level EIS.

Response: All projects will be subject to a site-specific analysis that complies with the NEPA. Depending on the scope and nature of the proposal, the analysis may or may not lead to an EIS. Each project will have a specific decision. The ROD for this FEIS requires that each project that may involve tree removal have a finding that the tree removal is clearly needed for ecological restoration and maintenance or public safety. This ROD also provides a method (see Figure 1) to help guide the responsible line officer in making this determination.

PC# 26: The Forest Service should use portable sawmills on location and use lumber products for Monument improvements or sell them to local communities, to reduce the amount of work.

Response: The FEIS and ROD do not preclude the use of portable sawmills. The specific design of each project and the final implementation method would determine whether or not this approach is feasible. These specific project-level considerations are beyond the scope of this planning document. Typically, if a project would produce commercial products as a byproduct of ecological restoration and maintenance or public safety, these products would be made available to the public on a bid basis. The final purchaser may indeed choose to use a portable sawmill in lieu of removing the logs.

PC# 27: The Monument Plan should use the standards for tree removal inside groves and mechanical entry into groves agreed upon in the Mediated Settlement Agreement (MSA).

Response: The provisions of the Mediated Settlement Agreement were not developed to be responsive to the specific needs of the Monument, as identified in the Proclamation (the need to reduce the risk of catastrophic fire and the need for ecological restoration). During both the scoping period and the comment period for the DEIS, a range of management approaches was proposed and was open to public comment. These approaches addressed a wide range of concerns such as tree removal, fuel reduction, public safety, and establishing young trees.

PC# 28: The Forest Service should ensure that biomass is burned in place or left to decompose naturally.

Response: The decision of how best to dispose of or treat biomass material will be made on site-specific projects given the highly variable conditions in the Monument. There may be situations where leaving this material on-site would be acceptable or other situations where it would be removed because of possible negative effects such as excessive fuel loadings.

PC# 29: The EIS should present sufficient information to determine the precise circumstances in which mechanical manipulation is clearly needed for ecological restoration.

Response: The FEIS acknowledges that there are ecological conditions under which the use of fire only would create unacceptable risks or impacts to important resources and human health and safety. The ROD provides an analysis tool to support the site-specific determination of whether or not mechanical manipulation is appropriate (see Figure 1 in the ROD). The description of this analysis tool acknowledges that site conditions within the Monument are so complex that this determination would only be accurate and appropriate during site-specific project analysis.

PC# 30: The Forest Service should leave all sequoias, sugar pines, and ponderosas that are two feet in diameter or more, unless they may cause a sequoia crown fire.

Response: The Monument Plan emphasizes protection and retention of these species when conducting vegetation treatments. The specific size of trees that would be retained will be determined during site-specific project analysis based on local conditions and direction provided in the Monument Plan.

PC# 32: The Forest Service should discuss what would happen to the rest of the Monument that is not being treated.

Response: The FEIS describes the management goals and strategies for both protection and restoration (see the Management Goals and Management Strategies sections in Chapter II). The 80,000 acres you refer to is only for the first decade. Management strategies would continue to be implemented in subsequent decades to meet protection and restoration goals. The intent is to re-introduce fire to all fire-dependent ecosystems, although it will take several decades to do this. Another major goal is to encourage wildland fire use once landscape conditions have reached a point where its risks and effects are acceptable.

PC# 33: The Forest Service should plant only native species.

Response: In the Direction Common to All Management Areas section in Chapter II, the FEIS states that natural regeneration will be the primary method for re-vegetating openings. Forest Service policy does not allow for the planting of non-native species and requires that all native species be grown from locally collected seeds except in very unusual circumstances.

PC# 37: The Forest Service should look into mechanical smashing of woody material to reduce fire danger.

Response: Mechanical treatments, including chopping or masticating of woody materials, are proposed in all alternatives.

PC# 38: The Forest Service should use service contracts for thinning and restoration activities.

Response: The appropriate method of accomplishment for a specific project would be determined during site-specific project analysis and in the project decision. The ROD for this FEIS does not limit the methods of accomplishment. Methods may include work by Forest Service personnel, volunteers, service contracts, or other agreements.

PC# 39: The Forest Service should prohibit post-fire salvage logging.

Response: None of the alternatives prohibit post-fire salvage logging. Alternatives 3 and 4 generally prohibit the use of heavy equipment off of roads. This would effectively prevent the salvage of most parts of a burned area. Risks to public health and safety may require removing fire-killed trees in some locations and under some circumstances.

PC# 40: The Forest Service should acknowledge that a variety of mechanical treatments are available for fuel reduction purposes.

Response: The FEIS and ROD do not limit the kinds of mechanical treatments for fuels reduction to only thinning (see the definition of Mechanical Treatments in the Glossary in Chapter VII). Hand methods are also acknowledged as available, which can include the use of handsaws, axes, and loppers. All of these can be used for limbing. The specific treatment methods to be used would be determined in site-specific project analyses. The effects of these hand methods are considered to be within the scope of the effects analyzed for mechanical thinning, as they would have less intense impacts.

PC# 41: The EIS should describe the environmental effects of planned logging. --and--

PC# 44: The EIS should provide an effects analysis and management guidelines for the projected removal of hazard trees.

Response: The Monument Plan follows the direction in the Framework. See Appendix D for a summary of that direction.

PC# 46: The Forest Service should consider contracting out the reduction of fuel loading to private firms in order to expand the rate of fuel load reduction.

Response: The use of service contracts or other agreements is an available option in all alternatives. The rate of treatment and decisions on specific projects are made by Forest Service line officers based on land management plans. These decisions cannot be made by private contractors.

PC# 47: The Monument Plan should commit to at least the level of protection for the groves as set forth in the MSA.

Response: The provisions of the MSA were not developed to be responsive to the specific needs of the Monument as identified in the Proclamation (the need to reduce the risk of catastrophic fire and the need for ecological restoration), which supersedes the MSA. During both the scoping period and the comment period for the DEIS, a range of management approaches was proposed and was open to public comment. These approaches addressed a wide range of concerns such as tree removal, fuel reduction, public safety, and establishing young trees. We believe these go far beyond the MSA to preserve, protect, and restore the groves.

(a) Funding for Management Activities

PC# 20: The Forest Service should use science and not revenue as the basis for removing trees. --and--

PC# 22: The Forest Service should propose a less expensive alternative than Number 6. --and--

PC# 97: The Forest Service should make it clear why it selected the most expensive alternative for implementation and why it is relying upon the sale of timber to support management costs.

Response: The ROD fully explains the Forest Supervisor's rationale for his decision. His decision is based upon a balance of social, environmental, and economic rationale. None of the alternatives rely upon the commercial sale of timber to offset management costs and there is no economic incentive in any alternative to encourage the commercial sale of wood products.

PC# 21: The Monument Plan should prioritize treatments to determine funding priorities. --and--

PC# 99: The Forest Service should discuss the impacts of limited federal budgets on the implementation of the Monument Plan, particularly the ability to mitigate possible environmental effects such as erosion and damage to streams and rivers.

Response: All of the alternatives were developed based upon recent experience and knowledge of the amount of work that can be accomplished. Each alternative is feasible given the recent available budgets and foreseeable budgets. Anticipating the local effects from a national budget deficit is speculative and beyond the scope of this analysis. All project proposals would be designed consistent with stringent standards and guidelines (see Appendix A of the ROD) to minimize environmental effects.

(16) Transportation

PC# 23: The Monument Plan should limit vehicular emissions in the Monument.

Response: No vehicular emission limits are proposed in the Monument Plan. It provides programmatic direction for managing the roads in the Monument. In Chapter II of the FEIS, the description of each alternative includes the approximate length of the road system, the types of roads to keep open for use, the types of roads to be decommissioned, and the maintenance strategy. The effects of each

alternative are discussed in the Watershed, Transportation, Recreation, Wildlife, and Fire and Fuels sections in Chapter IV.

The Monument Plan does not authorize or analyze site-specific projects within the Monument, such as specific roads that may be open, closed, or decommissioned. Criteria for managing or decommissioning roads within the Monument are listed in Appendix E of the FEIS. Decisions to maintain, repair, close, relocate, or decommission roads will be made based in more site-specific landscape or project analyses.

No new road construction is proposed in the Monument for vegetation treatments. The proposed vegetative treatments, whether prescribed fire or mechanical, are based on the existing road system. The only new road construction would be to provide access to new recreation facilities, new administrative facilities, or scientific research, or to replace roads found to be producing unacceptable resource impacts. New roads needed for recreation facilities are estimated to be 4.2 to 6.4 miles in the first decade.

PC# 24: The Monument Plan should provide access within the Monument.

Response: The miles of roads and trails are discussed for each alternative in the Roads and Recreation sections in Chapter IV. The Monument Plan provides programmatic direction for managing the resources of the Monument, including roads. Each alternative of the FEIS addresses access to the Monument for public use and management. The effects of each alternative are discussed in the Watershed, Transportation, Recreation, Wildlife, and Fire and Fuels sections in Chapter IV. The Monument Plan does not authorize or analyze specific projects within the Monument, such as specific roads that may be open, closed, or decommissioned. Site-specific decisions regarding management of the Monument, including road closures or road decommissioning, would require site-specific analysis and public input.

PC# 25: The Monument Plan should show a map of Monument roads.

Response: Maps of the existing road system are included at the end of Appendix E of the FEIS. The Monument Plan provides programmatic direction for managing the resources of the Monument, including roads. The effects of each alternative are discussed in the Watershed, Transportation, Recreation, Wildlife, and Fire and Fuels sections in Chapter IV. The Monument Plan does not authorize or analyze site-specific projects within the Monument, such as specific roads that may be open, closed or decommissioned. Site-specific

decisions regarding management of the Monument, including road closures or road decommissioning would require site-specific analysis and public input. Criteria for managing or decommissioning roads within the Monument can also be found in Appendix E.

PC# 26: The Monument Plan should include a cumulative impacts analysis in the transportation section.

Response: The cumulative effects of each alternative are discussed in the Watershed, Transportation, Recreation, Wildlife, and Fire and Fuels sections in Chapter IV. The Monument Plan provides programmatic direction for managing the Monument. It does not authorize or analyze any site-specific projects.

No new road construction is proposed in the Monument for vegetation treatments. The projected vegetative treatments, whether prescribed fire or mechanical, are based on the existing road system. The only new road construction would be to provide access to new recreation facilities, new administrative facilities, or for scientific research, or to replace roads found to be producing unacceptable resource impacts.

The goals for the Monument transportation system, including roads, call for "coordinating transportation planning, management, and road decommissioning with the Sequoia and Kings Canyon National Parks…. to reduce traffic congestion and safety hazards, especially along major travelways (see the Management Goals (Common to All Action Alternatives) section in Chapter II of the FEIS)

(a) Roads

PC# 27: The Forest Service should have enough funds to sustain and maintain the Monument's road system.

Response: The Monument Plan provides programmatic direction for managing the roads in the Monument. In Chapter II, the description of each alternative gives the approximate length of the road system, the types of roads to keep open for use, the types of roads to be decommissioned, and the maintenance strategy. "If the funding is not adequate to keep the road system in acceptable condition, roads would be repaired, closed, relocated or decommissioned to reduce impacts. A lack of funding for maintenance could lead to reduced available road mileage as roads are closed or decommissioned (see the Roads section in Chapter IV)."

PC# 28: The Monument Plan should not propose any new road construction. --and--

PC# 29: The Monument Plan should construct new roads in the Monument.

Response: No new road construction is proposed in the Monument for vegetation treatments. The projected vegetative treatments, whether prescribed fire or mechanical, are based on the existing road system. The only new road construction that could occur would be to provide access to new recreation facilities, new administrative facilities, or for scientific research, or to replace roads producing unacceptable resource impacts. New roads for recreation facilities are estimated to be 4.2 to 6.4 miles in the first decade.

(b) Rights-of-Way/Access

PC# 102: The Forest Service should keep all available roads open for firefighting purposes.

Response: The Monument Plan provides programmatic direction for managing the roads in the Monument. In Chapter II, the description of each alternative gives the approximate length of the road system, the types of roads to keep open for use, the types of roads to be decommissioned, and the maintenance strategy (also see Appendix F). The effects of each alternative are discussed in the Watershed, Transportation, Recreation, Wildlife, and Fire and Fuels sections in Chapter IV.

The Monument Plan does not authorize or analyze site-specific projects within the Monument, such as specific roads that may be open, closed, or decommissioned. The criteria for managing or decommissioning roads within the Monument are listed in Appendix E. Decisions to maintain, repair, close, relocate, or decommission roads will be made based on more site-specific landscape and project analyses.

PC# 103: The Forest Service should address and provide relief for RS2477 assertions.

Response: As stated in the Proclamation, “The establishment of this monument is subject to valid existing rights.”

6. Letters from other Government Entities

Following are copies of the comment letters received on the DEIS from federal, state, and local agencies and elected officials.

March 11, 2003

Dunlap Band of Mono Indians
P.O. Box 44
Dunlap, CA 93621
(559) 338-2545
Fax (559) 338-2555

To: Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

Subject: Response to the Giant Sequoia National Monument
Draft Environmental Impact Statement

Dear Jim,

The Dunlap Band of Mono Indians have the following subjects that we wanted to make sure your team takes into consideration in regards to the Giant Sequoia National Monument - Draft Environmental Impact Statement (GSNM-DEIS) and how it may impact our ability to access our tribal territory for current and future use by our people.

Access: We need to continue to have access to our rancheria, trails, roads, gathering areas and sacred (burial) sites. This summer we are planning on bringing our Elders to the rancheria site and we have discussed a proposed strategy to transport our elders via quad runners overland to the site. The idea is to help those who are mobility impaired and transport them safely to the rancheria and back. The continued use of the established road system is vital to this tribal project and future activities.

Trails: The tribe is very interested in the proposed strategy involving trails work on the following trails: Crabtree, Verplank, Sampson Flat, Davis Flat and the Kings River trail. These trails are to be walked with local tribal elders/members and USFS Sequoia NF, Hume Lake Ranger District Recreation personnel who have a joint interest in preserving historical record of who used these trails and the interesting sites and view points that can be visited. This proposed strategy would involve personnel on a Tribal, Federal, State and community level who all have a common interest in such an exciting project. The date has yet to be identified on when we would first scout these trails out and identify which trails to rebuild.

Protection of archeological sites and gathering areas: Our Tribe is always concerned with the protection of our sacred sites, gathering areas, and all archeological sites within GSNM area. It is vital to our heritage that these be protected so present and future generations never forget the history of this beautiful land. These include those sites involving the remaining flume relics, and camps along the Kings River.

Please feel free to contact me if you have any questions or need additional information.

Thanks,

/s/ *Benjamin Charley Sr.*
Benjamin Charley Sr.
Tribal Chair

TULE RIVER TRIBAL COUNCIL

TULE RIVER INDIAN RESERVATION

March 14, 2003

Mr. Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

Dear Mr. Whitfield:

The Tule River Tribal Council (TRTC) supports Alternative 6, with changes, in the Giant Sequoia National Monument Management Plan Draft Environmental Impact Statement. Alternative 6 prescribes a range of management strategies that will be necessary for future restoration and protection activities within the monument.

It is important that management of these monument lands, a large portion of which surrounds the Tule River Indian Reservation (TRIR), emphasize forest fuels reduction to lower the current fire susceptibility and provide suitable conditions for young giant sequoia establishment and growth. Forest health must also be considered in the management of these mixed conifer and giant sequoia ecosystems. Maintaining an adequate road system for management and recreational use will compliment the above management objectives. Failure to adequately reduce fuels, manage vegetation within giant sequoia sites, manage for forest health, and maintain an adequate road system will negatively impact the Tule River Tribe.

The TRTC has identified specific issues and concerns in previous correspondence (July 2001 to the Notice of Intent) and during meetings we have had with the GSNM Supervisor and Planning Team, as well as the Scientific Advisory Board (July 2001, September 2001).

After review of the DEIS, we have the following comments:

1. The management areas that are adjacent to Reservation lands are identified as Z01-NG, GML, GSG3, and GSG1. Area Z01-NG encompasses many acres along the east and north common boundary between the GSNM and the TRIR. Most of the monument lands within the South Fork Tule River Watershed are classed as "Z01-NG". Under Alternative 6, the management emphasis for Z01-NG is to

Phone (559) 781-4271 FAX (559) 781-4610

"Encourage scientific research" (P II-67). While the Tribe agrees that this is an important objective for management within the monument, we are concerned that fuels reduction to meet protection and restoration goals is not clearly emphasized for this management area.

2. The Protection Strategy for Alternative 6 utilizes the Sierra Nevada Framework strategies (P II-58). Most of the monument lands that border the TRIR are not considered a part of the urban wildland intermix. As such, protection strategies will be less effective than those employed in threat and defense zones. In order to reduce the risk of catastrophic wildfires that the Tribal community and forest resources now face, at a minimum the Framework threat and defense zone strategies should be available for fuels treatment along the entire common boundary with the TRIR.

3. The Red Hill, Peyrone and South Peyrone giant sequoia groves are identified as potential sites for recreation development (P IV-78). Each of these groves borders and extends onto the TRIR, as does the Black Mountain grove. Increased visitor use at these locales has the potential to impact Tribal lands. This would apply to any other locales under consideration along the GSNM – TRIR boundary. The Tribe will expect that proper consultation occurs early in the planning efforts of any recreation development near TRIR lands.

4. The importance of retaining GSNM roads historically utilized by the Tule River Tribe and community is well documented. The Tribe identified specific Forest Service roads and their associated uses during the Roads Analysis Process. Advisory XIV. from the Scientific Advisory Board reinforces the value of these roads to the Tribe. The TRTC should be consulted prior to any restrictions on use or decommissioning of roads that have been identified by the Tribe in the Roads Analysis Process.

5. The right for Tribal members to gather materials of cultural value within the GSNM must be retained.

6. Managing forest fuels in the Southern San Joaquin Air Basin with a dependence on prescribed fire may result in areas or acres left untreated. Mechanical treatments should be given greater consideration.

7. Forest health considerations should be a part of protection and restoration objectives. The actions that will be taken to minimize extensive tree/forest injury and/or mortality from insects and disease outbreaks, or wildfires, should be outlined. Minimal or no action on GSNM lands could adversely affect TRIR forest resources.

8. Regarding the DEIS Fire and Fuels Existing Policy (pp 111 – 35, 36), reference should be made to the following two reports: 1) FY 2002 Interior Appropriations Senate Report, No. 107-36 (June 29, 2001) which states that *"The Committee notes with increasing concern the ground fuels build-up within the Giant Sequoia*

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National Monument and along its boundary interface with the Tule River Indian Reservation. Current drought conditions raise the likelihood of a fire jeopardizing the monument and reservation"; and 2) FY 2002 Interior Appropriations Conference Report, No. 107-234 (October 11, 2001) which states " *The Managers direct the Forest Service to provide technical assistance to the Tule River Tribal Reservation with its ground fuels mitigation program, the acquisition of appropriate fire suppression equipment, and the training of a tribal hot-shot crew."*

9. The Tribe continues to research claims to both land and water within the GSNM. The TRTC remains concerned that future claims could be jeopardized.

10. Written agreements between the U.S. Forest Service and the Tule River Tribal Council are necessary to formalize any mutually agreed upon procedures regarding GSNM management issues. DEIS pages II-5 through II-7 discusses "Management Direction Common to All Alternatives". The TRTC suggests that the following language be included in this section: "*Specific Memorandums of Agreement between the U.S. Forest Service and the Tule River Tribal Council shall be developed and honored. These Agreements will be utilized and referenced during the process of planning and implementing GSNM management activities that may affect Tribal resources or resource-use. Examples of such Agreements would include, but not be limited to, consultation protocol, road-use, archaeology, traditional gathering areas, sacred sites, recreation areas, fuels management and stewardship contracting arrangements on lands important to the Tule River Tribe."*

11. Government to Government consultation will occur on any proposed monument actions that may affect the Tule River Tribe. Such consultation will be in accordance with applicable Agreements and other policies and procedures agreed to by the U.S. Forest Service and the Tule River Tribal Council.

Please contact our staff or myself if you have questions or wish to discuss these issues in greater detail. The Tribal Council and staff can also meet with your Planning Team and Mr. Gaffrey at your leisure.

Sincerely,

Neil Peyron, Tribal Chairman
Tule River Tribal Council

DEIS Comments
Tule River Tribal Council

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County of Fresno
CHAIRMAN
BOARD OF SUPERVISORS
SUPERVISOR JUAN ARAMBULA – DISTRICT THREE

March 13, 2003

Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

SUBJECT: Giant Sequoia National Monument Management Plan
Draft Environmental Impact Statement

Dear Mr. Whitfield:

The County of Fresno has completed review of the above referenced project and provides its support for Alternative 6, the preferred alternative, as it provides the widest range of management strategies. In addition, we have the following comments:

A large portion of Fresno County is federal land within the Sierra and Sequoia National Forests. These areas are an important part of our County, and their use, or limitations on their use, can have major impacts on the economy and quality of life for residents of Fresno County and surrounding rural counties. Fresno County has consistently supported the use and enjoyment of our public lands, and opposes any management plan that would impose increased restrictions on access.

Our key areas of concern regarding the management of public lands focus on the impact these decisions will have on recreation and tourism, and the economy.

RECREATION & TOURISM:

The travel industry is a multi-billion dollar business in California with significant economic benefits to residents in Sierra Nevada Counties. The tourism element of the local economy is dependent on the continued and reliable access to the public lands within Fresno County. Management direction for the Monument should not harm recreation and tourism by limiting recreation alternatives and opportunities, or restricting access to national forest land. Management direction for the Monument should seek to preserve and protect access to public lands for citizens seeking to participate in all types of recreational activities that occur on national forest lands including: camping, fishing, hunting, wildlife viewing, and other trail recreation that contributes to the tourist economy of forest communities.

The Forest Service should pursue adequate protection to the economic and social needs of communities dependent on forest lands, while maintaining and restoring the environmental resources.

Room 300, Hall of Records / 2281 Tulare Street / Fresno, California 93721-2198 / (559) 488-3663 / FAX (559) 488-6830 / 1-800-742-1011
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ECONOMIC:

Recreation, Timber, and Agriculture are the three largest employment sectors directly impacted by Forest Management, generating millions of dollars in salary and revenue. A Monument Management Plan that would cause adverse impacts to these industries and associated revenue production would be devastating to Fresno County, which is already burdened with double-digit unemployment. The forest use and resources derived should be actively managed, and broad-based restrictions should be avoided. We encourage the use of Stewardship Contracts to retain revenues generated by the sale of merchantable timber, and seek the added benefit of operational viability for the remaining saw mill in our area.

It is imperative that issues, such as the economy, recreation, tourism, social well-being, and public safety, that directly impact the citizens of Fresno County are given, on balance, the same consideration as proposed resource protections.

We appreciate the opportunity to comment on the project. If you have any questions, please telephone me at (559) 488-3663.

Sincerely,

Juan Arambula, Chairman
Board of Supervisors

cc: Board of Supervisors
Bart Bohn, CAO
Richard Brogan, Director, Department of Public Works & Planning

United States Department of the Interior
OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1111 Jackson Street, Suite 520
Oakland, CA 94607

March 6, 2003

ER: 02/1117

Jim Whitfield
U.S. Forest Service
GSMN Team Leader
900 West Grand Avenue
Porterville, CA 93257

Subject: Review of Draft Environmental Impact Statement for the Giant Sequoia National Monument Management Plan, Fresno and Tulare Counties, California

Dear Mr. Whitfield,

The U.S. Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for your opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: Director, OEPC, D.C.
Regional Director, NPS

PLANNING DEPARTMENT
TED JAMES, AICP, Director
2700 "M" STREET, SUITE 100
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FAX: (661) 862-8601 TTY Relay 1-800-735-2929
E-Mail: planning@co.kern.ca.us
Web Address: www.co.kern.ca.us/planning/info.htm

RESOURCE MANAGEMENT AGENCY
DAVID PRICE III, RMA DIRECTOR
Community Development Program Department
Engineering & Survey Services Department
Environmental Health Services Department
Planning Department
Roads Department

Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

March 14, 2003

Re: Draft Environmental Impact Statement (DEIS) for the Giant Sequoia National Monument

Dear Mr. Whitfield,

The Kern County Planning Department appreciates the opportunity to comment as the southern portion of the monument designation extends into Kern County.

The Presidential Proclamation that created the Monument identified a need to take action in regards to the heavy buildup of fuels and the lack of regeneration of giant sequoias to ensure long-term sustainability of the trees. The Forest Service's Preferred Alternative No. 6 appears to fulfill these goals while providing for the widest range of management tools to ensure success.

Staff has reviewed the alternatives for impacts on the activities and rights of our residents on public land and offers the following comments:

1. Alternatives 3 and 4 are unacceptable as they will result in a reduction of the roads and trail system. Designation of the monument resulted in the loss of motorized access and additional closures will further restrict public access.

2. Prevention of wildfire events are vitally important to the economic vitality of the forest communities. Alternatives 5 and 6 are the most acceptable for restoring normal fire conditions to the Monument, over the greatest number of acres in the first 10 years. To the extent Alternatives 1, 2, 3, and 4 limit the acres treated and methods used they are not acceptable.

3. Alternative 6 will add the most PM10 emissions over the first decade than other alternatives. This is a short-term effect that will be off-set by the long-term gains in normal fires and regeneration of young sequoias.

The Kern County Planning Department appreciates the opportunity to provide input on the Giant Sequoia National Monument Plan. If you have questions regarding these comments please call me at (661) 862-8866 or Loreleio@co.kern.ca.us.

Yours truly,

Lorelei H.Oviatt, AICP
Senior Planner

United States Department of the Interior
NATIONAL PARK SERVICE
Sequoia and Kings Canyon National Parks
47050 Generals Hwy
Three Rivers, California 93271-9651
(559)565-3341

IN REPLY REFER TO:

D18

March 17, 2003

Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, California 93257-2035

Dear Jim:

I'm submitting the following comments on the Giant Sequoia National Monument Plan DEIS. Although I would have preferred that these comments be incorporated into an Advisory from the Science Advisory Board, it does not appear that there is any longer a mechanism to do so. Consequently, these comments reflect my personal scientific opinion.

According to the Sierra Nevada Ecosystem Project *Status of the Sierra* Nevada, and the Sequoia National Forest data that were available at the time we prepared that report, representation of late-successional old-growth in the mixed-conifer zone of the Monument is greatly diminished from what it would have been without the past history of logging. We know, from the SNEP report, the *Sierra Nevada Forest Plan Amendment*, and many other documents, that although LSOG stands are critical to only a small suite of animal species in the Sierra Nevada, individual large decadent trees, as well as the snags and logs which they eventually become, are valuable to a much larger suite of birds, mammals, reptiles, and amphibians.

The most immediate source of new large trees (e.g. ~>40" dbh) is recruitment from the size classes directly below them. Although sheer size is not the only criterion, since decadence generally requires substantial age as well, it's certainly the quickest start. It's ecologically important for the Monument to get through its LSOG bottleneck as soon as possible.

I recommend that the Monument plan include the following decision system: Before removing trees 20" or larger—either mechanically or by burning—a site analysis be conducted at the scale of the NRCS *Drainage* (≈California Planning Watershed) that determines the actual density of large trees and extent of LSOG stands. Use modeling to estimate what the density and extent of large trees would be under steady-state conditions (i.e. natural fire regime) in that drainage. Then retain (at least) a sufficient number and distribution of the largest mature trees (20-30") to reasonably assure the potential for recruitment of large trees at predicted density.

It has been my experience in the Sierra Nevada that mature trees are rarely hazardous fuels, so I would expect that it would be relatively uncommon that they were considered for removal in any case. But in those situations where they are judged a fuel hazard, I recommend that except for critical WUI locations they nonetheless not be removed if they constitute part of the minimum base for large tree recruitment.

Sincerely,

David M. Graber, Ph.D.
Sr. Science Advisor

Jon McQuiston
SUPERVISOR - FIRST DISTRICT

Office of the First District Supervisor
1115 Truxtun Avenue, Suite 501
Bakersfield, California 93301-4639
Toll-Free 800-221-3625
Phone 661-868-3650
Fax 661-868-3657

March 10, 2003

Arthur L. Gaffrey, Forest Supervisor
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

Re: Draft Environmental Impact Statement (DEIS) for the Giant Sequoia National Monument

Dear Mr. Gaffrey:

The release of your draft DEIS for the Giant Sequoia National Monument for comment in the aftermath of the devastating McNally Fire has prompted this letter. As the Kern County Supervisor of the First District, which includes the Kern River Valley, I am deeply concerned about the management of the Sequoia National Forest and the Monument. These forest areas provide recreational, preservation, and economic opportunities to people in the Kern River Valley and throughout California that are essential to the region's future growth and economic viability.

The McNally Fire devastated not only the wildlife and trees, but destroyed recreational camps, threatened people and property, placed firefighters in danger, and created a fiscal drain on government resources. Restoration of the burned areas, even with active management, is anticipated to take more then 50 years. This is not a legacy to leave for our future citizens.

Cautious neglect for over 120 years has resulted in the current condition of these forests: overgrown canopies that block the growth of young sequoias and provide fuel for extremely hot fires that leap into the upper branches rather then stay low to the ground. Wilderness designation next to residential communities has complicated the fighting of such fires and the implementation of preventive measures.

The Presidential Proclamation that created the Monument identified the need to address the heavy buildup of fuels and the lack of regeneration of giant sequoias in order to ensure long-term sustainability of the trees. I support the alternative that gives you the widest range of tools and management latitude to accomplish this task. Recommendations from your fire specialists and Science Advisory

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RIDGECREST OFFICE
400 N. China Lake Blvd.
Ridgecrest, CA 93555
760-384-5829

SHAFTER OFFICE
329 Central Valley Hwy.
Shafter, CA 93263
661-746-7561

Council that have reviewed the last 120 years of fire suppression should be included to ensure that any alternative is based on sound science. Management now in all forms including hand logging, mechanical logging, chipping, and prescribed burns is needed to prevent another McNalley Fire and ensure that young sequoias grow for the next 400 years to become giant sequoias.

Sincerely,

Jon McQuiston

JM/lo

cc: Kern County Board of Supervisors
County Administrative Office
County Counsel
Fire Department
Planning Department
Kern River Valley Chamber of Commerce
Kernville Chamber of Commerce
Honorable Ann M. Veneman, Secretary of Agriculture
Congressman Bill Thomas

BARBARA BOXER
CALIFORNIA

COMMERCE, SCIENCE,
AND TRANSPORTATION
ENVIRONMENT
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FOREIGN RELATIONS

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http://boxer.senate.gov

March 11, 2003

Art Gaffrey, Supervisor
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, California 93257

Dear Supervisor Gaffrey:

I am writing to convey my strong objection to the preferred alternative identified in the Draft Environmental Impact Statement (DEIS) for the Giant Sequoia National Monument. The Forest Service's preferred alternative contradicts the intent of the proclamation that created the Monument and should be rejected in favor of a balanced approach to management of this irreplaceable public resource.

I am particularly disturbed that the preferred alternative calls for commercial logging within the Giant Sequoia National Monument. This plan would allow up to 10 million board feet of timber to be cut annually from large trees that are up to 30 inches in diameter. This is far more timber than was being produced from this portion of the forest before the Monument was created.

The intent of the Monument was to provide more protection for the Giant Sequoia, not less. The Monument proclamation clearly states, "No portion of the Monument shall be considered to be suited for timber production..." Unfortunately, the Forest Service appears to be determined to substantially increase timber production in the Giant Sequoia National Monument .

The Sequoia National Forest has not yet recovered from the aggressive clearcutting in the 1980's. Spotty regrowth of trees and heavy brush fields have been the result of these poor management practices of the past. We can and must do better. Future generations of Americans are counting on us.

I urge you to reject the preferred alternative of the DEIS when issuing the Final EIS. Indeed, the Forest Service should choose an option that protects the Sequoia groves and the surrounding ecosystem and that meets the intent of the original proclamation that created this Monument.

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SAN DIEGO, CA 92101
(619) 239-3884

☐201 NORTH 'E' STREET
SUITE 210
SAN BERNARDINO, CA 92401
(909) 888-8525

Thank you for your consideration of these comments. Should you or your staff have questions regarding this letter, please contact Tom Bohigian, my Deputy State Director at 559-497-5109.

Sincerely,

Barbara Boxer
United States Senator

San Joaquin Valley
Air Pollution Control District

March 17, 2003

20020598

Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville CA 93257

Subject: Draft Environmental Impact Statement (DEIS)
Giant Sequoia National Monument Management Plan

Dear Mr. Whitfield:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the project referenced above and offers the following comments:

The entire San Joaquin Valley is classified non-attainment for ozone and fine particulate matter (PM10). This project will contribute to the overall decline in air quality due to increased traffic and ongoing operational emissions. This project may generate significant air emissions and it will reduce the air quality in the San Joaquin Valley. The project will make it more difficult to meet mandated emission reductions and air quality standards. A concerted effort should be made to reduce project-related emissions as outlined below:

DEIS page III-33, under *District Designations*, incorrectly states that the Fresno urban area is in non-attainment for carbon monoxide (CO.) The San Joaquin Valley Air Basin (SJVAB), including metropolitan areas, is currently in attainment for CO at federal and state levels, although potential for CO hotspots are of concern.

The DEIS includes Table IV-1 (Predicted PM-10 Emissions) but only calculates emissions from burning. The PM standards apply to both primary and secondary sources. For example, a timber harvest operation may emit primary and secondary emissions from soil disturbances (e.g., the felling of trees, vehicle movements on dirt, road travel, carryout/trackout unto public paved roads, etc.), burning of forest residue (slash), recreational travel on unpaved roads, and from secondary sources such as emissions from equipment used during timber harvest, logging trucks, and visitor and recreational vehicles. The forests, especially in the San Joaquin Valley Air Pollution Control, must not only thoroughly account for PM sources, but also ozone/ozone precursor sources.

The DEIS should contain a discussion of seasonal impacts on PM10 concentrations from prescribed fire emissions by alternative. Also, although true in its most stringent interpretation regarding PM10/2.5 concentrations over the 24-hour period, the San Joaquin Valley Air Pollution Control District is also concerned with public exposure to PM10/2.5 concentrations during any duration (even if it is less than 24 hours) which may cause a nuisance as defined in CA Health and Safety code section 41700.

The emission reduction timeframe conflicts with attainment timeframes established by the Federal Clean Air Act. The District is required to meet PM10 air quality standards (both 24-hour and annual averages) by

David L. Crow
Executive Director/Air Pollution Control Officer

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Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 • FAX (559) 230-6061

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
(661) 326-6900 • FAX (661) 326-6985

www.valleyair.org

December 31, 2006. We cannot undertake ten years of increased emissions and still meet Federal Clean Air Act mandates for achieving both the annual and 24-hour standards for PM10. It should be noted that an air district must have three consecutive years of non-exceedances to qualify for possible reclassification. If the SJVAB were to achieve that standard, we would then have to maintain the air quality standards. Can the National Forest assure us that their prescribed burning activities, as described in the DEIS, will not result in any exceedances?

In addition to the above noted concerns, the DEIS should be updated to reflect the California Air Resources Board amendments to Title 17 and the smoke management requirements contained therein (including costs associated with local air district review and implementation to accommodate national forests); and the Prescribed Fire Incident Reporting System (PFIRS) which is still not available to local air districts.

District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please cali me at 230-6000.

Sincerely,

Hector R. Guerra
Senior Air Quality Planner

State of California – The Resources Agency
DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
San Joaquin Valley and Southern Sierra Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4014

March 14, 2003

Mr. Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, California 93257

Dear Mr. Whitfield:

Draft Environmental Impact Statement (EIS) for the
Giant Sequoia National Monument Management Plan (GSNMMP)

We have reviewed the Draft EIS referenced above. The Giant Sequoia National Monument (Monument) was created by Presidential Proclamation on April 15, 2000. A total of 34 groves or complexes of giant sequoia occur in the 327,769 acre Monument. The Monument is located within the Sequoia National Forest. According to the Presidential Proclamation, there were two specific threats to giant sequoia that needed to be addressed in the GSNMMP, including; 1) the heavy buildup of surface fuels and woody debris leading to an increased hazard from wildfires, and 2) a lack of regeneration of young giant sequoias to ensure long-term sustainability of the species. The Draft EIS presents six alternatives designed to manage the giant sequoia and other objects of interest. The GSNMMP will establish management direction for resources within the Monument and will amend the current Sequoia National Forest and Resource Management Plan (Forest Plan), as Amended by the Sierra National Forest Plan Amendment. Our comments on the Draft EIS follow:

The Department of Fish and Game (Department) Generally Supports Alternative 6: We believe that sensitive species as well as other plant, fish, and wildlife resources can best be protected by using the wide range of management strategies proposed in Alternative 6. According to the Draft EIS, Alternative 6 has the greatest potential to improve Late Seral/Old Growth (LSOG) habitat within the Monument. Wildlife that seem to prefer this habitat, and therefore would benefit the most, are the California spotted owl, great gray owl, northern goshawk, Pacific fisher, and American marten. The effect the GSNMMP may have on the fisher has received significant attention recently, which is understandable as the Sequoia National Forest (SNF), and therefore the

Monument, is believed to have the highest concentration of fisher in the Sierra Nevada, and appears to function as a source of individuals that could be expanding the species population north, to the SNF.

While there is concern that Alternative 6 may have a detrimental effect on the fisher, we believe the GSNMMP, as described in the Draft EIS, will benefit the fisher, as well as the other LSOG species listed above. We concur with the factors described on page IV-61 of the Draft EIS to support Alternative 6, most importantly the need to reduce the fuel load in forest stands with more than 60 percent canopy closure (the Sierra Nevada Framework (Framework) guideline for fisher). In the Monument, these are mostly second-growth stands with dense underbrush and high fuel loads. "Thinning within these stands would have the greatest potential to reduce risk to existing habitat and to increase the size and development of multi-layered canopies." Alternative 6 would not specifically follow the Framework canopy cover guideline for fisher, but it is believed that this decision will be "outweighed by the potential for expansion of suitable habitat and the reduction of threat to known existing habitat." It should also be noted that the Framework canopy cover guideline "is currently not met in most watersheds where fisher are present" on the Monument.

Two other important benefits of Alternative 6 include: 1) The protection of the highest level of LSOG habitat of all the alternatives because the greatest flexibility in treatments is allowed under this alternative, thereby producing the fewest LSOG acres that may be lost to a severe wildfire; and 2) mechanical treatments before prescribed fire allow for more protection of downed logs, snags, and other LSOG habitat features that may be lost if an area is simply treated with prescribed fire alone. We understand that mechanical treatments (including some timber harvest) under Alternative 6 would probably decrease considerably after the first decade of the GSNMMP, because fuel loads would be reduced to the point where prescribed fire could be safely used as the dominant treatment (personal communication, Mr. Steve Anderson Sequoia National Forest Wildlife Biologist).

All of the alternatives would be expected to increase early seral stage habitat, and therefore provide improved habitat for mule deer, mountain quail, songbirds, and other wildlife that prefer this habitat. Alternative 6 would provide the greatest increase in acreage of early seral stage habitat as it calls for the greatest number of acres to be treated.

In regard to livestock grazing, Alternative 6 (and the other 5 alternatives) will follow guidelines in the Framework, which is expected to result in a 20-30 percent decrease from current levels of grazing on the Monument. This result would obviously benefit mule deer, through reduced competition for forage, and possibly improvement of summer meadow resources. The willow flycatcher (including the Federally-endangered southwestern subspecies) is also expected to benefit from the Framework grazing guidelines through establishment of limited operating periods during the bird's breeding season.

Success Depends on Its Funding, Implementation, and Monitoring: The success over time of Alternative 6 will depend on the ability of the United States Forest Service (USFS) to fund the GSNMMP and to stay focused on meeting their stated goals for up to 100 years or more. The Department intends to play an active role in insuring that the plant, fish, and wildlife resources of the State are protected and managed as promised in the GSNMMP and the Draft EIS. In addition, the Department will evaluate and comment on individual treatment projects that are proposed under the GSNMMP, and track the SNF's monitoring of the fisher and other LSOG species' populations, to assess how different projects are affecting them. Presumably, the new Sierra Nevada regional furbearer monitor position, that the USFS is stationing at the SNF headquarters in Porterville, will help make effective fisher monitoring a reality.

GENERAL MANAGEMENT CONCERNS

Roads: We are concerned about the discussion of roads and maintenance levels for roads in the Monument. Over 70 percent of the roads have a low maintenance level (ML 1-2). While some roads are at a higher maintenance level, the conclusion Appendix D, (page D-18) is that "Given the current road funding sources, it is not feasible to maintain the current Monument road system to standards under the current and expected budget allocation…" It is further concluded the "amount of deferred maintenance is expected to continue to increase, and the lower standard roads will degrade quicker due to lack of adequate maintenance activities."

Based on the discussion of road maintenance in Appendix D, there is some confusion about the intended miles of road that will be maintained at any level within the Monument. There are more than 899 miles of road, yet the discussion provides cost estimates for maintaining just five percent of these road miles and concludes that this will most likely not occur due to budget restrictions. We fail

to see how any unpaved road can go five years between some sort of maintenance. The bottom line is that it appears that very little road maintenance will occur to 95 percent of the roads within the Monument.

The Draft EIS, including the discussion in Appendix A, fails to discuss the adverse impacts of roads on the aquatic system. Roads are a major source of sediment to streams, which adversely impacts aquatic resources (Burns 1972; Eaglin et al. 1993; Elliot 2000; and Megahan et al. 1972).

The Draft EIS should include a discussion of what roads can and should be decommissioned to preclude impacting aquatic resources. There should be a review of the Forest Road Management Plan to ensure roads that would be subjected to accelerated damage during the late season be closed to public access with an explanation of why they are closed, if there is evidence that they are causing resource damage. The most current Best Management Practices must be implemented throughout the Monument to minimize impacts to resources while allowing roads to stay open for recreational access.

Sierra Nevada Framework Modifications: We are concerned that the USFS is in the process of evaluating the Framework standards and guidelines. These guidelines could be weakened (with respect to wildlife protective features) as the result of this ongoing evaluation by the Regional Forester. If this occurs, then some of the protection of the Monument resources may not occur. For instance, the current Framework provides for a 20-30 percent reduction in livestock grazing that would be an overall benefit to wildlife. Should the percentage be reduced as an outcome of the evaluation, then we believe that the GSNMMP would be compromised. The GSNMMP should insure that wildlife protective features that are tied to the Framework cannot be reduced in scope if the Framework is weakened.

SPECIFIC COMMENTS AND EDITS

Draft Environmental Impact Statement

Page III-71, 1st paragraph, last sentence – The statement that floodwaters from Tulare Lake last reached its outlet in 1878 is incorrect. Waters from the lake reached the San Joaquin River as late as 1983.

Page III-71, second paragraph, 4th sentence – The reference to the Middle Fork Tule River should be changed to the North Fork of the Middle Fork Tule River. The Middle Fork Tule River refers to the river downstream of the confluence of the North Fork of the Middle Fork and South Fork of the Middle Fork.

Page III-77, 4th paragraph, 4th sentence – Please check the reference to Grizzly Lakes. We are unaware of lakes with that name in the area.

Page III-79, 3rd paragraph, 2nd sentence – We believe that the reference to the North Fork of the Kings River should be the Middle Fork Kings River. Also, Kern brook lamprey should be added to this list of native species (State designated Species of Special Concern).

Page III-83, 4th paragraph, last sentence – Somewhere in this discussion, and elsewhere in this document, it needs to be noted that the California golden trout has been proposed for listing as Endangered. The United States Fish and Wildlife Service are currently considering this proposal in a 12 month review to decide if listing is warranted.

Page III-89, 2nd paragraph, 2nd sentence – The statement about a minimum pool at Lake Success is inaccurate. There is a sedimentation pool, but no minimum pool where water is authorized. The lake can be legally drained. Also, the sediment pool is full. The statement that 6,500 acre-feet of sediment pool remains is incorrect.

Page III-99, Table III-21 – There are several errors in this table. Both the mountain yellow-legged frog (MYLF) and California golden trout should be PT, proposed for Federal listing.

Page III-110, 2nd paragraph – The reason for the decline of MYLF is most likely a combination of stress factors, one of which is trout. The cause most likely varies by region. It is also inaccurate to state that they over winter "underwater." There are many populations of MYLF that are not associated with lakes and over winter some other way. We would suggest you review the draft MYLF conservation strategy for a more accurate discussion of reasons for the decline of MYLF.

Appendix D, Page D-17 – This document does not give adequate value to ephemeral streams. These streams seasonally serve as important spawning grounds for trout, and other species, trying to escape the high spring flows of the perennial streams (Erman et al. 1976). In addition, these streams can be a major source of sedimentation.

Thank you for the opportunity to comment on the Draft EIS. We look forward to working with the USFS over time to insure that resources within the Monument are afforded the highest level of care possible. If you have any questions regarding these comments, please contact Mr. Rod Goss (terrestrial resources) or Mr. Stan Stephens (aquatic resources) at the address or telephone number provided on this letterhead.

Yours sincerely,

W. E. Loudermilk

W. E. Loudermilk
Regional Manager

Reference List

Anderson, Steve, Sierra National Forest Wildlife Biologist, Personal communication.

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Eaglin, G. S. and W. A. Hubert. 1993. Effects of logging and roads on substrate and trout in streams of the Medicine Bow National Forest, Wyoming. North American Journal of Fisheries Management 13: 844-846.

Elliot, W. J. 2000. Roads and other corridors. Pages 85-102 *in* G. E. Dissmeyer, editor. Drinking Water from Forest and Grasslands. USDA, Forest Service, Southern Research Station, GTR SRS-039.

Erman, D. C. and V. W. Hawthorne. 1976. The quantitative importance of an intermediate stream in the spawning of rainbow trout. Transactions of the American Fishery Society. 105: 675-681.

Megahan, W. F. and J. Kidd. 1972. Effects of logging and logging roads on erosion and sediment deposition from steep terrain. Journal of Forestry 70: 136-141.

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UNITED STATES
HOUSE OF REPRESENTATIVES

COMMITTEE ON AGRICULTURE

COMMITTEE ON RESOURCES

ASSISTANT MAJORITY WHIP

March 13, 2003

Art Gaffrey
Forest Supervisor
Sequoia National Forest
900 West Grand Avenue
Porterville, CA 93257

Supervisor Gaffrey:

I wanted to thank you again for meeting with me and my staff regarding the Giant Sequoia Monument on Friday, February 21. Your insight on the various management plans was imperative to lending my support to one alternative.

The Bush Administration has made the Forest Health Initiative a legislative priority and it is a great concern of mine as well. The loss of a national treasure such as the majestic Giant Sequoias by catastrophic fire would be a great tragedy. This scenario almost became reality with the recent McNally fire.

Because of this fire and similar fires that devastated the West last summer, I am giving you my full support for alternative six. Of all the alternatives, alternative six allows the U. S. Forest Service the most diverse range of management practices to protect and restore these ancient groves. I believe alternative six is a good start to achieving the goals set forth by President Bush and addresses my concerns as well.

These awe-inspiring trees need to be protected and admired for generations to come and under your leadership and this alternative, I am confident they will remain so.

Please don't hesitate to contact me if I can ever be of assistance. Keep up the good work.

Sincerely,

Devin Nunes

DEVIN NUNES
Member of Congress

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DOUGLAS WILSON, DIRECTOR — JAMES H. LARSEN, ASSOCIATE DIRECTOR

March 17, 2003

Jim Whitfield
GSNM Team Leader
900 West Grand Avenue
Porterville, CA 93257

Subject: Comments to the Draft Environmental Impact Statement (DEIS), dated August 2003 for the Grant Sequoia National Monument Management (GSNM) Plan.

Dear Mr. Whitfield:

Thank you for the opportunity to comment on the subject DEIS. Our comments will focus on the DEIS discussion on transportation/roads. The Tulare County Maintained Road System has a significant role in the access and travel through the GSNM. On Page D-4 of Appendix D of the subject DEIS, Tulare County roads accessing the GSNM are M265 and M469 in the northern portion, M50, M56, M99, M3, M9 and M109 access the central and southern portions of the GSNM, and M107 travels north-south inside the GSNM.

On Page D-6, it states, "The Sequoia National Forest has approximately 1,640 miles of road. Within the Forest, the GSNM has approximately 900 miles of road (Table 1). Forest roads are defined as a road wholly or partially within, or adjacent to, and serving the National Forest System and necessary for the protection, administration, and use of the National Forest System and the use of development of its resources (Title 23, US Code, Section 101; FSM 7705 – Definitions)." It is unclear to us, how many miles of the identified 900 miles of forest road system are Tulare County maintained road miles.

We ask that the following be clarified in the GSNM DEIS:

1) Identify the number of County maintained miles in the 900 miles of forest roads;
2) Identify the condition, classification and maintenance cost for said County maintained miles;
3) Discuss which alternatives would increase the deterioration rates on the Tulare County Road System accessing the GSNM or located inside the GSNM;
4) Discuss the estimated funding needed to adequately maintain the said Tulare County Road System needed to mitigate for increased road deterioration as a result of possible project alternatives.

Tulare County staff would be pleased to meet with you or your staff to discuss our questions. Please contact the undersigned should you have any questions or would like to schedule a meeting.

Yours very truly,

James A. Blair
Assistant Director – Transportation

JAB:mm

cc: Douglas Wilson, Director – RMA
Art daRosa, RMA – Program Coordinator
Jean Brou, RMA – Operations Engineer
Ben Reynoso, RMA – District 4 Road Superintendent
George Sell, RMA – District 1 Road Superintendent
Tony Forner, RMA – District 5 Road Superintendent

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DOUGLAS WILSON, DIRECTOR

JAMES H. LARSEN, ASSOCIATE DIRECTOR

March 17, 2003

Mr. Jim Whitfield
GSNM Team Leader
900 West Grand Avenue
Porterville, CA 93257

Dear Mr. Whitfield:

Subject: *Comments on Draft EIS for the Giant Sequoia National Monument Management Plan*

The Resource Management Agency – Long Range Planning Branch (RMA-LRP) has reviewed the Draft EIS for the Giant Sequoia Management Plan and offers the following comments:

1. **Alternatives.** The RMA-LRP acknowledges the hard work of U.S.F.S staff in developing a wide range of alternatives that address the Presidential Proclamation. Given the extent of the needs identified in the Proclamation, the RMA-LRP believes that the tasks facing the U.S.F.S. are monumental (pun intended). The RMA-LRP contends that the Management Plan that has the best chance of long-term success is one that provides the greatest levels of flexibility in management strategies. This is particularly important when there may be new findings and understandings that may necessitate changes in implementing the Management Plan.

2. **Fuel Management.** As described in various sections in the Draft EIS, fuel loading and fuel management are critical issues. The RMA-LRP asserts that in order to prevent disastrous fires in the National Monument and Sequoia National Forest, reducing the tremendous fuel load is of paramount importance. As documented in the Draft EIS, the speed with which fuel loading is reduced has a direct effect on the overall health of the forest.

   To that end, the RMA-LRP believes that the judicious use of mechanical equipment, including heavy equipment, to reduce fuel loading in the Monument is an efficient and cost effective method to achieve the mandates of the Presidential Proclamation. Based on the estimates in the Draft EIS, the alternatives that do not include the use of mechanical methods or limit their use to minor mechanical devices, do not provide for the necessary reduction in fuel loads, still leaving the whole forest system at great risk.

Although it is recognized that it will require years to properly alleviate the present high fuel loads, the RMA-LRP recommends that the Management Plan and Draft EIS include an expanded rate of fuel load reduction. This would increase the number of treated acres and would allow for greater use of the forest by visitors.

Related to reducing fuel loading, it is recommended that the U.S.F.S. consider contracting out said services to private firms. With proper oversight from the U.S.F.S., this would be cost effective and would help stabilize employment in the forest use industries that has seen a progressive loss in jobs. Private firms that have operated in the National Forest have both the necessary experience and equipment to assist the U.S.F.S.

3. **Size Limitation on Trees.** Related to fuel loading and forest recovery, the various alternatives generally limit the size of trees that may be considered for selective removal to 30 inches or less in diameter. However, in consideration of the overall objectives of the Management Plan, there may be occasions that the removal of trees larger than 30 inches would be beneficial. Increasing the size of trees also improves management's flexibility.

4. **Private In-holdings/Access.** The RMA-LRP recommends that the U.S.F.S. consider selecting the alternative that provides for the greatest protection of the rights of holders of private in-holdings. This includes access to said in-holdings. For example, some alternatives would reduce access in the Monument by closing roads. This should not be allowed if closure would adversely affect access to private in-holdings.

5. **Urban/Forest Boundary.** RMA-LRP recommends that the U.S.F.S. select the Management Plan that provides for the greatest level of flexibility and protection strategies. The adherence to a strict distance standard may not be in the best interests of the either the U.S.F.S. as it manages the Monument or owners.

6. **Recreational Opportunities.** RMA-LRP contends that the Management Plan that expands the recreational opportunities within the Monument to the maximum extent feasible would provide for the best use of private and public resources. For example, Figure II-14 shows 15 potential Recreation Opportunity Areas within the Monument. An increase in the number of developed recreational opportunities would have a beneficial secondary effect on the County's tourism industry and would allow for greater enjoyment of the Monument.

7. **Management Plan needs to be expanded.** Although caves and related resources that are located with the Monument are described beginning on Page III-34, none of the Alternatives address their conservation and potential management as recreational areas.

The Draft EIS on Page IV-12 concludes that each of the management strategies and goals for all the alternatives would limit effects on cave resources. However, there is no quantification or analysis of these strategies as they relate to cave resources to help the reader understand the relationship of the strategies to the protection of said resources.

In closing, RMA-LRP appreciates the meetings held during the course of the comment period on the Draft EIS. U.S.F.S. staff has been very helpful in answering questions about the Management Plan alternatives and the Draft EIS. As implementation of the selected Management Plan Alternative goes forward, RMA-LRP anticipates that the U.S.F.S. will continue to solicit public input.

If you have any questions on the above comments, please feel free to contact me.

Sincerely,

Keith Woodcock, Manager
Countywide Planning Division

c: Honorable Jim Maples, Chair, County of Tulare Board of Supervisors
Honorable William Sanders, Vice Chair, District 1
Honorable Connie Conway, Supervisor District 2
Honorable Steve Worthley, Supervisor District 4
Janet Hogan, County Administrative Officer
Doug Wilson, Director Resource Management Agency
George Finney, Asst. Director Long Range Planning Branch

STATE OF CALIFORNIA—THE RESOURCES AGENCY GRAY DAVIS, *Governor*

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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March 14, 2003

Arthur L. Gaffrey
Forest Supervisor
Sequoia National Forest
900 W. Grand Avenue
Porterville, California 93257

Dear Supervisor Gaffrey:

As you know, California National Forests hold high importance for the citizens of this State. Consequently, the state has participated in many of the National Forest planning processes over the years and has recently expressed concerns about some federal proposals that might undercut protections for these forests. Few national forest lands in the Sierra Nevada are more beloved by Californians than those of Giant Sequoia National Monument, whose creation they overwhelmingly supported.

Currently we are reviewing the Draft Management Plan and Environmental Impact Statement for Giant Sequoia National Monument. As part of this process, I have been reminded of the important role played by the Science Advisory Board created by the monument proclamation to inform the Forest Service's development of a monument management plan. If the final plan and EIS are to live up to the proclamation's requirements, they must be thoroughly reviewed by the Science Advisory Board to ensure that they reflect the best available science.

I know that the Science Advisory Board is meeting this week, and I ask that you convey to its members my strong support for their continued and vigorous involvement in the management planning process both during the review of the plan and EIS, and into the future, serving in an advisory and oversight capacity as management actions are implemented.

Sincerely,

Andrea E. Tuttle

Andrea E. Tuttle
Director

cc: Mary Nichols, Secretary for Resources
Jack Blackwell, USFS Regional Forester

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GRAY DAVIS, *Governor*

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March 18, 2003

Mr. Art Gaffery, Forest Supervisor
Sequoia National Forest
900 W. Grand Avenue
Porterville, CA 93257
Via email: GSNM_Public@fs.fed.us and
Via Corrected Hardcopy

Dear Mr. Gaffery:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Giant Sequoia National Monument (Monument) that will guide the management of the Monument. The California Department of Forestry and Fire Protection (CDF) recommends that the issues in this response be addressed in the final Environmental Impact Statement (EIS).

CDF submitted comments prior to President Clinton's designation of the monument under the Antiquities Act. Some of those issues are re-stated here, along with additional comments based on the DEIS.

CDF is interested in the management of the Giant Sequoia National Monument to a great degree as a neighboring landowner. The State's Mountain Home Demonstration State Forest (MHDSF) is a 4,807 acre public forest owned by the State of California and surrounded by the Monument. The primary management goals of MHDSF as established by the California Legislature are recreation, giant sequoia protection, scientific research and demonstration.

Our agency has had over a half century of experience in giant sequoia management on MHDSF. Mountain Home is threatened by a buildup of fuels in adjacent Monument lands due to years of fire suppression and decline of fuels reduction activity since the early '90s. The Monument must have an effective and comprehensive fuels reduction program that places high priority attention to the boundaries within Mountain Home Demonstration State Forest.

Mountain Home has demonstrated exemplary management for silviculture, giant sequoia regeneration, maintenance of old growth stands and fuels reduction. Some of the scientific literature of active management of giant sequoia forest has been generated on MHDSF. CDF is also involved in fire protection within the Monument area, both directly and cooperatively with the Forest Service.

CDF wholeheartedly supports the goals for the area as expressed in the proclamation establishing the Monument - that the old-growth giant sequoia trees be protected in all management activities. Based on our experience, we recommend the following issues be fully addressed in the final EIS:

Management Areas

- MHDSF is surrounded by the GSN Monument and also has a parcel of Monument land within its boundaries. In the existing land allocations as established by the Framework, the federal land adjacent to MHDSF includes land designated as old forest emphasis area, spotted owl Core Area and Protected Activity Center, and Defense and Threat zone allocations for fuel treatment. Under the preferred alternative 6, MHDSF is surrounded by the following management areas: General Monument Lands (Management Area GML - 219,500 acres), Zones of Influence without the Groves (Management Area ZOI-NG – 64, 370 acres), and Management Area GSG1 – 12,870 acres (Groves that have had no significant disturbance for the last 120 years and with little regeneration). Thus, how the Monument is managed will have a very direct effect on MHDSF.

- CDF has found that prescribed fire, mechanical treatments or a combination of the two have proven to be effective in re-introducing the disturbance regime back into the ecosystem. Our mechanical treatments have included selection logging and thinning of young giant sequoias where they occur in dense regenerated stands. In our mechanical treatments, where vertical and horizontal fuel continuity was a concern, we have opened the canopies to allow for disruption of the fuel continuity while maintaining functional wildlife habitat for all species found within our boundaries. Our experience has taught us that some degree of management flexibility both within and outside the groves is helpful in designing effective treatments. However, the DEIS lacks adequate specificity to determine what the management standards and guidelines will be and therefore, what the environmental impacts will be.

- Given the values at risk and the limitations of the federal budget, it is imperative that the Monument have a better-defined, effective and comprehensive program of fuels reduction with high priority attention directed to the fuels build-up along the boundaries with Mountain Home Demonstration State Forest.

- In addition, the plan should have a more clearly defined, strategic approach to fuel reduction that prioritizes protection of giant sequoia groves, other old growth forest areas, and spotted owl, fisher, and other key wildlife habitat.

Management Outside the Groves

- The Monument surrounds many scattered parcels of non-federal land that could be affected by the management of the monument. Of greatest concern to CDF is MHDSF, described above. In addition, there are numerous mountain communities that lie within or adjacent to the Monument. These mountain communities contain relatively high-density residential developments and recreational facilities. There are also parcels of private, state, and county land managed for recreation, timber production, grazing, and other uses. These areas that are surrounded by Monument lands, including especially MHDSF and local communities, should be given priority in the development of a more detailed, strategic fuel reduction strategy.

Fire Protection

- The effect of the monument plan on fire protection activities should be carefully considered. CDF is involved in direct protection within a portion of the monument area and cooperatively assists the Forest Service in the protection of much of the monument area. Any changes in direct protection boundaries could impact the CDF operations in the area, potentially affecting the amount and allocation of fire fighting resources. The potential for the federal government to increase its level of fire protection in the monument area should be considered.

- Protection of giant sequoia groves from wildfire on any ownership will remain an important management goal. We recommend that the Forest Service avoid any changes that might reduce our current ability to aggressively control fires, especially in the initial attack stage. All current fire suppression techniques should continue to be available. Any management decision that might decrease road access should give careful consideration to the impact that it may have on fire suppression activities. For roads proposed for closure, consideration should be given to gating the roads and maintaining access for emergency fire suppression activities.

Consistency with Existing Policy, Plans and Regulation

- The final management plan for the Monument must be consistent with existing policy, plans, and regulations. Some of these are referenced in the DEIS. (DEIS II-5 et. seq.)

- The Final EIS (FEIS) should also reference the Sequoia Mediated Settlement Agreement and disclose how the final plan comports with that Agreement.

- The final EIS should also explain in more detail how the plan is consistent with President Clinton's proclamation establishing the Monument. In particular, the issues and questions raised by California Attorney General Bill Lockyer in his comment letter of February 11, 2001 should be addressed in the final EIS.

- In addition, the final EIS should more fully disclose the relationship of the final plan to the Sierra Nevada Forest Plan Amendment Framework (Framework).

- In particular, the DEIS does not adequately explain why certain components of the Framework were included while others were excluded (DEIS II-7). The Framework was adopted by the Forest Service to address all of the same issues as the Monument plan with the exception of giant sequoia protection. In particular, the Framework establishes a range-wide plan for balancing the need for fire risk reduction with protection of old growth forest and the California spotted owl and other old growth associated wildlife species. The final Monument plan must include an analysis that justifies deviation from the Framework.

- Such an analysis should show how the fuel conditions and the needs of the spotted owl in the Monument differ from those found in the other national forests of the Sierra Nevada. By proposing an alternative (Alternative 6) that would treat more acres, more aggressively than the Framework Alternative (Alternative 1), the plan would negatively impact spotted owls and other wildlife species potentially leading to a listing of the owl under the Endangered Species Act. Such a listing would have the debilitating effect of creating controversy, litigation, and gridlock, bringing needed fuel treatment work to a halt, threatening giant sequoia groves, communities, and our Mountain Home Demonstration State Forest.

- The proclamation establishing the Monument is clear in setting the preeminent goal of protection of the giant sequoia groves and associated natural environment. The public expectation for Monument management was, and is, for management that is at least no more aggressive then management of the surrounding national forest. As the Framework governs management of the other national forests in the Sierra Nevada, the FEIS must provide the basis for the selection of any alternative that differs from the Sierra Nevada Framework, i.e., Alternative 1.

Summary

1. The Monument must have a better-defined, effective and comprehensive program of fuels reduction with a high priority attention to the fuels build-up along the boundaries with Mountain Home Demonstration State Forest. Protection strategies must be incorporated into the final EIS to protect the estimated 7,000 old growth giant sequoia trees located within MHDSF.

2. The final plan should contain a comprehensive fire protection plan that allows for current fire suppression activities.

3. The final plan should provide for a range of disturbances to reduce fuel loading, allow for thinning of dense stands, create small openings, and promote regeneration. The plan should also provide more detailed standards and guidelines and management prescriptions so that impacts of these types of activities can be adequately addressed. In addition, the plan should allow some flexibility, with specified limits, in terms of stand manipulation to reduce fuel load both within and outside the grove areas. CDF believes that a robust program of adaptive management that includes public input and the continuing input of the Scientific Advisory Board is essential to building public trust, and ensuring that management evolves over time to reflect current monitoring and the best available science.

4. CDF supports a diversity of management techniques in giant sequoia groves as part of a clearly defined, strategic fuel reduction plan that has both flexibility and some limits.

5. CDF supports the proposal for more intensive management in even-age conifer plantations.

6. The impacts to spotted owl, fisher and other old growth associated species must be more fully disclosed in the final EIS. In addition, it should provide the scientific, policy and legal information and justification for reducing protections and changing the standards and guidelines and management prescriptions in the Sierra Framework.

7. In its existing form, the DEIS does not provide enough detail to justify the apparent deviations from existing policy, plans and regulations governing the Monument. The missing information should be provided in the final EIS.

The California Department of Forestry and Fire Protection appreciates the opportunity to comment on this important proposal. CDF has a vested interest in the monument because of current conditions that present a great risk to Mountain Home Demonstration State Forest. We offer our assistance and look forward to continuing our collaborative relationship with the federal land mangers in the area. Please keep us informed about the outcome of this process.

Sincerely,

Andrea E. Tuttle

Andrea E. Tuttle
Director

United States Department of the Interior
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Sequoia and Kings Canyon National Parks
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IN REPLY REFER TO:

D-18 (SEKI)

March 17, 2003

Mr. Art Gaffrey
Supervisor, Sequoia National Forest
900 W. Grand Avenue
Porterville, CA 93257-2035

Dear Mr. Gaffrey:

Thank you for the opportunity to review the *Giant Sequoia National Monument Management Plan Draft Environmental Impact Statement*. It is obvious that this is a document of considerable importance to both our organizations. The direction contained within this document will determine the character of much of the southern Sierra for many years to come.

Our comments that follow are intended to be collaborative in nature. We greatly respect and enjoy the longstanding cooperation that has occurred between the U. S. Forest Service and the National Park Service in the southern Sierra Nevada.

One of our general comments is our belief that the document would benefit from a more focused vision for the future of both the natural resources and cultural resources of the Monument as well as a clearer perspective on how the Monument would be used by humans over time. The generic nature of the plan's vision of what the Monument is to become makes the plan somewhat challenging to evaluate.

Let us offer some examples.

The Presidential proclamation that created the monument places clear emphasis on ensuring that the giant sequoias which are found on the Monument will be managed in such a manner as to guarantee their individual health and longevity as a species. This seems to us to be the dominant instruction within the proclamation. In this light, we have a little difficulty discerning what these groves are to become. An example would be the material presented in figure III-7 (and accompanying narrative), which implies that the groves within the Monument require an 80% reduction in standing trees to reach a desired condition. We have some difficulty figuring out what this desired condition is. The proposed action, obviously, is a significant change in forest structure and one that will be felt within these groves possibly for centuries. There is no question that the sequoia groves of the southern Sierra have seen substantial increases in tree density. We're not suggesting that the goals of the Monument need to be or should necessarily be the same as those for Sequoia and Kings Canyon National Parks. We understand the differing agency missions. The approach presented in the draft plan differs significantly from the approach

that has been pursued successfully for several decades within these parks. We would suggest that the difference in goals here make it important that a long-term vision for the Monument's forests be more clearly defined.

Over the past thirty-five years, the National Park Service has developed a successful program for managing giant sequoias that is based upon natural processes, particularly the use of fire. We understand that the proclamation instructs the Forest Service to carry out a program of experimental management. We are unable to find such an approach in the draft *Plan*. Rather, it appears that a single type of management is to be applied to the forest as a whole. There is much to be gained by pursuing a number of different approaches and monitoring results. Sequoias are a very long-lived species, and it has been our experience that cause and effect relationships resulting from giant sequoia management directions are almost never immediately apparent. Our suggestion would be for a conservative, multi-faceted approach.

As the Forest Service works to implement its experimental program of giant sequoia management, we encourage you to continue to appreciate the value of prescribed burning as one of the core group of forest management tools. Recall the 1987 Pierce Fire, which burned aggressively on multiple use Forest Service lands, and even killed monarch sequoias within the Forest Service portion of the Redwood Mountain sequoia grove, but lost most of its intensity once it entered NPS lands where recent prescribed burning had occurred. This clearly demonstrates the efficacy of this tool.

This agency along with many allied agencies and organizations, including the Forest Service, has developed a substantial scientific body of knowledge related to fire. Most of this material results from studies that were seeking ways of restoring and/or maintaining ecological health. We are not aware of a similar body of material relating to mechanical thinning as a means of restoring ecological health. Rather most of the literature in this area focuses on managing forests for silvicultural purposes. For this reason, we assume that it will be some time before mechanical thinning is perfected as a means of achieving the goals put forth in the proclamation. This leads us to believe that the Forest Service's mandate to develop an experimental program of forest management is highly necessary and appropriate. This same point is further reinforced by the ongoing interagency fire surrogate studies, a portion of which are occurring in these parks. All this suggests that to pursue any single program too aggressively could lead to unexpected results. We have been managing sequoias in these parks with the goal of preservation for more than a century, and we still find that there are many things we learn with each passing season.

The Park Service is always concerned about the management of neighboring lands, and our relationship with the Sequoia National Forest has been a model of cooperation and collaboration. Nearly all of the lands within the Forest that adjoin these two parks are now within the Monument. In a number of areas resources that are critical to the management of both the Monument and these parks cross over the man-made line that creates an artificial boundary between forest and park. Good examples include the Dillonwood, General Grant, Hitchcock Meadow, and Redwood Mountain sequoia groves. Since our separate missions now both call for the long-term protection of these resources, we would like to see this concern more directly addressed in the draft *Plan*. Recognizing the biological unity of these resources, it is important that the plan address the issue of cooperative management toward shared goals. Only to a slightly lesser degree, this comment applies to all places where our lands adjoin.

The proclamation speaks at substantial length to the importance of the natural and cultural resources of the Monument. It also instructs the Forest Service to develop a plan which "provides for visitor enjoyment and understanding about the scientific and historic objects in the monument,

consistent with their protection." While our agency missions clearly differ, this instruction mirrors closely that contained in the 1916 act that created the National Park Service. This agency thus has over 80 years of experience in attempting to carry out such a mission. From this point of view, it might be of value for us to share some perspectives that relate to visitor understanding and enjoyment.

To achieve the visitor enjoyment and scientific and historic understanding goals of the Monument we would suggest the plan for the management of the Monument clearly define desired visitor experiences as well as how those experiences will impact resources.

The population of central California is growing very rapidly. Most analyses forecast ever-growing urbanization in the San Joaquin Valley over the next half century. This suggests that the future of the Giant Sequoia National Monument may well reflect the national forest experience in the past half century in the Angeles and San Bernardino national forests of Southern California. In these areas, the demand for outdoor recreation has concentrated more and more on the national forests and has impacted resources significantly at some sites. Managing visitors and use impacts has become a primary job of much of the forest staff. Ongoing planning for Sequoia and Kings Canyon National Parks is looking at these issues. We would suggest that the vision required to achieve the Monument's presidentially-established goals address how recreation is to evolve and how it is to be managed so that resources of significance will survive and prosper.

We stand ready to collaborate with the Monument staff with more in-depth conversation regarding joint use and operations. We share many visitors, resources, and concerns. Visitors to the northern unit of the Monument will inescapably also be national park visitors. Our current General Management Plan process has reminded us that the parks' recreational capacity is finite. This being the case, what happens in future years on the Monument is significant for both of our missions.

Two examples of this connection are the Big Stump Entrance Station, operated jointly in a very rewarding partnership by our two agencies, and the Dillonwood Grove of giant sequoias. Recent NPS transportation studies have identified the Big Stump station as the single worst traffic congestion point in the Kings Canyon/Hume Lake region, yet most visitors who are destined for the northern unit of the Monument must pass through this station. We would suggest that the draft *Plan* address this issue from the perspective of the Monument mission. At Dillonwood, we face similar issues, even if they are not so imminent. We would be happy to collaborate to enhance the recreational and educational relationship between national forest and national park at sites like Big Stump and Dillonwood.

Another use issue of particular interest to the Park Service is the future of the Generals Highway in the northern unit of the Monument. This highway is a very busy visitor corridor connecting Sequoia and Kings Canyon National Parks. Recent traffic studies suggest that at peak season its use is approaching capacity, especially at the north end. We would suggest that Monument management proposals that envision either greatly increased visitor use of this highway, or its more intense use as a transportation route for the products of forest management (i.e., logs) consider the impact on existing use and the potential for congestion. We also suggest that potential impact on the roadway itself be addressed. The roadway is maintained by the Park Service but was never designed to sustain the latest generation of increasingly heavy logging trucks. Another problem area here is again the Big Stump Entrance Station. On many days visitors must wait 10-20 minutes to get through the station. This situation could worsen significantly if traffic is increased. We would suggest a collaboration of analysis.

In alternatives 5 and 6, the Forest Service recognizes the necessity of developing visitor facilities to support those who wish to visitor the Big Trees. We note with some concern the proposals for development in or near giant sequoia groves. As you are aware, this was done within these parks and found to be a very significant error. We are hopeful that Monument staff will learn from some of the mistakes we made in the 1920's and 1930's. By placing development within groves, we created numerous natural resource impacts including trampling, reproductive disturbance and soil erosion, while at the same time creating very significant public safety issues. In recent decades, in response to these problems, we have spent tens of millions of dollars to remove the great majority of the development we previously placed within the groves. We suggest that you consider very carefully the lessons learned by these parks as you decide where to place future development.

We also reviewed the environmental compliance sections of the draft document. Our agency compliance requirements may differ, but for information purposes we offer the following, generic comments.

It is our understanding that NEPA requires the definition of outcomes. Since outcomes in the draft *Plan* for either natural or cultural resources are difficult to assess it appears in many ways the plan is more about process than outcome.

In reviewing the alternatives, we note that they cover varying issues. Since the purpose of alternatives is to compare different approaches for achieving goals, it is standard procedure to construct alternatives that can be readily compared and contrasted. To the extent possible, we suggest that the alternatives be revised to be consistently parallel in their construction.

Another compliance matter is that of cumulative impacts. Our understanding of NEPA is that compliance requires that agencies consider cumulative impacts both over time and in the context of those carried by others. With large-scale change imminent in this region, and many projects and plans proposed cumulative impacts would seem to be a significant question.

We appreciate the magnitude of the task the Forest Service faces in developing a clear and well-focused plan to carry out the goals contained within the Giant Sequoia National Monument proclamation. The issues involved are complex and the consequences substantial. It is our hope that in offering these comments we have assisted the Forest Service in addressing the challenges it faces. The National Park Service stands ready to be of assistance in any way possible. We remain committed to working with the Forest Service to advance this project to a positive and productive conclusion.

Sincerely,

Richard H. Martin
Superintendent

BILL LOCKYER
Attorney General

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February 11, 2003

Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

RE: Comments on Draft Environmental Impact Statement for the Giant Sequoia National Monument

This letter contains the comments of the Attorney General of the State of California regarding the United States Forest Service's Draft Environmental Impact Statement for the proposed Giant Sequoia National Monument Management Plan.

The Attorney General submits these comments pursuant to his independent authority under the California Constitution, common law, and statutes to represent the public interest. Along with other State agencies, the Attorney General has the power to protect the natural resources of the State from pollution, impairment, or destruction *See* Cal. Const. Art. V, sec. 13; Cal. Gov. Code secs. 12511, 12600-12; *D'Amico* v. *Board of Medical Examiners*, 11 Cal.3d 1, 14-15 (1974). These comments are made on behalf of the Attorney General and not on behalf of any other California agency or office.

In 2000, President Clinton re-designated almost one third of the Sequoia National Forest as the newly created Sequoia National Monument. By doing so, the President recognized the unparalleled nature of the Giant Sequoias and related ecosystem, and dramatically altered the management principles for the area. Unfortunately, the Forest Services proposed management plan for the Monument fails to comply with the promise and requirements of the Monument Proclamation and the 1992 Presidential Proclamation exempting the Groves from commercial logging, violates the spirit and words of the 1990 Sequoia Mediated Settlement Agreement, and does not met the standards of the National Environmental Policy Act ("NEPA"), 42 U.S.C. 4321 et seq. As a long time participants in the Sequoia National Forest, and now Monument, planning process, we are dismayed by the proposed management plan (which is not actually described or set forth as a plan in any discernable form) and related environmental review, and fear that the Forest Service is placing a national treasure at unnecessary risk. Most strikingly, the Forest Service ignores the prescriptions on timber harvesting and road building that are centerpieces of

both Presidential Proclamations.

COMMENTS

I. Background to Attorney General's Participation in Giant Sequoia and Sequoia National Forest Planning Issues

The majestic Giant Sequoias, unique to California, are environmental jewels of the State, the Nation, and the world. Every Californian, whether he or she visits the Groves or not, has a stake in the preservation and management of the Monument as a symbol of the vibrancy of the State and its environment. The California Attorney General has participated in land management issues related to the Sequoia National Forest and the Monument for the past seventeen years to help ensure public participation in the process as well as protection of the Groves and ecosystem consistent with federal and state laws and the meaningful application and use of science and monitoring.

The Attorney General began participating in the Sequoia National Forest Land Management Planning process in 1986, providing comments relating to the Land Management Plan and related environmental documentation and through appeal of the Forest Service's decision to proceed with the Plan. The Attorney General cited to deficiencies in analysis of environmental impacts of the proposed Plan under NEPA and failure of the Plan to meet the requirements of the National Forest Management Act. As the result of the Attorney General's appeal along with many others, the Forest Service agreed to a mediation process in an attempt to resolve the dozens of issues raised by a disparate group of appellants. Following a seventeen month mediation process, in 1990, twenty-seven parties signed an historic 170-page mediated settlement agreement ("MSA") that redefined management of the Sequoia National Forest, and set forth, as a centerpiece of the agreement, strict rules, requirements, and guidelines for management and care of the Giant Sequoia Groves in the Forest.

The MSA created the protection for the Groves that allowed the Sequoia National Monument to be created. The MSA still governs management on many aspects of the Sequoia National Forest, and will do so until the Forest Service issues and finalizes its next land management plan. As detailed below, the Preferred Alternative proposed by the Forest Service for management of the Monument provides significantly less protection for the Groves and related ecosystem than the MSA, in violation of the meaning and spirit of the MSA, of the MSA process, and of the Proclamation creating the Monument. It also violates the July 14, 1992 Presidential Proclamation that removed the Groves from use for mining and commercial timber harvest.

Continuing participation in Sequoia management and planning issues, the Attorney General intervened in the law suit challenging the creation of the Monument, supporting the creation of the Monument and the legality of the Proclamation.

The Presidential Proclamation in 2000 creating the Monument precludes commercial timber harvesting and mining in the entire Monument (not just the Groves). The specific Giant Sequoia Grove protections of the 1992 Presidential Proclamation are existing uses that cannot be diminished; the Proclamation should not–cannot–be read to provide less protection for the Giant Sequoia Groves than the 1992 Proclamation and the existing MSA.

It is with this history of participation in Sequoia planning and management issues that the Attorney General presents these comments. Our comments focus on major concepts and are not an exhaustive discussion of all issues.

II. Violations of the Monument Proclamation

The Monument Proclamation states:

> No portion of the monument shall be considered to be suited for timber production, and no part of the monument shall be used in a calculation or provision of a sustained yield of timber from the Sequoia National Forest. *Removal of trees,* except for personal use fuel wood, *from within the monument area may take place only if clearly needed for ecological restoration and maintenance or public safety.*" Proclamation, DEIS Appendix G-9 (emphasis added).
>
> These forests need restoration to counteract the effects of a century of fire suppression and logging. *Id.* at G-4.
>
> No new roads or trails will be authorized within the monument except to further the purposes of the monument. *Id.* at G-10.

According to the DEIS, the volume of "wood products" range in the evaluated alternatives from about .2 MMCF to 2.14 MMCF per year.[1] DEIS at IV-83. The DEIS states that "Alternative 4 would support no commercial harvest at all." As a result, by the specific terms of the Monument Proclamation–that "no portion . . . shall be considered to be suited for timber production"–only Alternative 4 is a legal alternative. The Monument is not to support commercial harvest. That is one of the significant attributes of the Monument. Certainly, if specific ecological restoration and maintenance or public safety gives rise to sale of those specific logs to timber companies, such sales would not violate the Monument Proclamation. But the inclusion of a specific concept of commercial harvest in the Monument violates the express provisions of the Proclamation banning commercial logging.

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[1]Two key issues–the failure to describe the "project" in any meaningful manner that would allow the reader to determine what the Forest Service actually plans for the Monument, and Forest Service's use of million *cubic* feet rather than the traditional million *board* feet for timber yield without any conversion for the uninitiated–are discussed in detail in the section describing NEPA violations below.

The DEIS sets forth specific numbers of commercial timber related jobs that it allocates to different plan alternatives, concluding that it could be from zero to 55 jobs, with the preferred alternative supporting 25-30 jobs. DEIS at IV-83. The DEIS concludes, "[w]hile these jobs are small in number, they are important because they might make the difference between continued operation and closure of the one mill available to serve the Monument." *Id.* While we are very concerned about any possible loss of jobs, commercial timber production, apparently with production goals and the intention of maintaining specific jobs, is wholly at odds with the specific terms of the Monument Proclamation. The discussion of commercial harvest and the possible relation to logging and mill jobs is completely improper; it is simply precluded from consideration by the Monument Proclamation, and the Forest Service's inclusion of such consideration and such discussion in the DEIS violates the Proclamation. The Proclamation cannot be more clear: The Forest Service is not to make planning decisions in the Monument based on any consideration of timber harvest. The sole criteria for tree cutting is ecological restoration and maintenance and public safety.

The Monument Proclamation states that "[n]othing in this proclamation shall be deemed to affect existing special use authorizations." DEIS Appendix G-11. On July 14, 1992, President George H. W. Bush issued a Giant Sequoia Proclamation (copy attached). That Proclamation states, inter alia,

> This Nation's Giant Sequoia groves are legacies that deserve special attention and protection for generations.
>
> The Secretary of Agriculture is directed to delineate the location of such Giant Sequoia groves, as set forth in the Sequoia National Forest Mediated Settlement Agreement . . . . The designated Giant Sequoia groves shall not be managed for timber production and shall not be included in the land base used to establish the allowable sale quantities for the affected national forests. The designated Giant Sequoia groves shall be protected as natural areas with minimal development. Consistent with the best scientific information available, the Secretary of Agriculture shall assure that any proposed development shall provide for aesthetic, recreational, ecological, and scientific value.

The 1992 Giant Sequoia Proclamation creates a existing special use for each and every Giant Sequoia Grove designated through the Mediated Settlement Agreement process. This special use authorization precludes commercial timber harvest in the Groves. The Forest Service's preferred alternative, and every alternative other than alternative 4, violates the prescription of both Proclamations. The Forest Service simply cannot make any timber harvesting or tree removal decisions except on the explicit determination that the specific tree removal is *clearly needed for ecological restoration and maintenance or public safety.*

II. The Mediated Settlement Agreement

By its own terms, the 1990 Mediated Settlement Agreement will expire when a new

management plan is in place for the Sequoia National Forest. At the time each of the Presidential Proclamations was made (1992, protecting the Groves, and 2000, creating the Monument), the MSA was in force. It cannot reasonably be disputed that the safeguards for the Giant Sequoia Groves set forth in the MSA must be considered as a baseline of protection and management, and that the Proclamations were not designed and did not lessen the protection afforded to the Groves. Yet, the proposed Management Plan for the Monument (to the extent that the outlines of the Plan can be discerned from the wholly inadequate description in the DEIS) appears to reduce the protection available under the MSA.[2] The MSA substantially limits logging in the Groves:

> [P]rohibited logging shall mean any logging activity except logging conducted for the limited and specific purpose of reducing the fuel load in the Groves pursuant to a Grove specific fuel load reduction plan and Grove specific EIS. The only salvage logging permitted in the Groves will be that logging permitted and described in the previous sentence. It is agreed that the methods to be used to remove specific trees from the Groves, as part of an adopted fuel reduction plan, shall be the most environmentally sensitive available. The objective of the fuel load reduction plans shall be to preserve, protect, restore and regenerate the Giant Sequoia Groves, without unnecessary damage to any old growth trees in the Grove. Any logging component of a fuel reduction program in a grove shall protect the old-growth pine, fir, incense cedar and black oak components of the stand. Any tree identified for removal under this paragraph shall be so identified in the field in consultation with a forester from either Save-the-Redwoods League or the Sierra Club. MSA at 10-11 (see attached).

These basic protections are apparently not afforded the Groves–let alone the rest of the Monument–in the proposed Monument Plan.[3] The Forest Service should commit in its Monument Plan to at least the level of protection set forth in the MSA, and it should do so not just for the Groves but for the entire Monument. Logging activity under the MSA, just as under both Presidential Proclamations, can be done solely for the limited and specific purpose of reducing fuel load (or for public safety under the Proclamation). The Forest Service must explicitly commit to this in concept and in practice to comply with its legal obligations. So far, from what can be discerned from the DEIS, it has not done so. It is equally basic that the tree removal methods must be the most environmentally sensitive, and that any tree removal must be done pursuant to a fuel reduction plan as described in the MSA. The Forest Service committed to meeting these obligations in the MSA; nothing in the Monument Proclamation lessons the Forest Service's obligations. In light of the MSA requirements and those of the Proclamations, the Forest Service must state, as part of the Monument Management Plan, that removal of trees in the Monument will be done consistent with fuel load reduction plans; will promote

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[2]The 22 pages of specific management requirements set forth in the MSA are attached to this letter as Attachment 2.

[3]Again, it is impossible to know, as the Plan has not been set forth beyond a vague and minimal description.

preservation, protection, restoration, and regeneration; will preclude unnecessary damage to old growth; and will be done in consultation with independent foresters. These specific actions will bring the Forest Service into conformity with the requirements and spirit of the MSA and will promote the purposes of the Monument Proclamation.[4]

III. NEPA Violations

The DEIS for the Monument Plan is significantly deficient in a number of areas. One issue, however, is over-arching, and our comments focus primarily on that matter and only cursorily on other deficiencies.

The DEIS ostensibly reviews the environmental impact of a proposed action or project–the management plan for the Monument. Unfortunately, the Forest Service *has failed to set forth any proposed management plan for review*. The Forest Service has not published a plan. We have no way of knowing what the Forest Service proposes to do in the Monument. It is impossible to answer the most basic questions about the proposed project. What, for example, silvicultural techniques will be used? Which will not? What criteria are relevant to determination of cutting method? What roads exist? Which roads will be removed? On what basis? Will new roads be built? For logging? What impacts will they have? What is the current fuel load in each Grove? Which Groves are the highest priority? What actions will be taken in those Groves? What different techniques will be used? How will actions be monitored? The Forest Service has not stated in any manner what its plan is for the Monument. The sole substantive statement concerning "mechanical treatments" was made by Supervisor Gaffrey, not in the Plan or DEIS, but as he was quoted in the Bakersfield California with respect to the cutting of one hundred year old Giant Sequoias.

"The detail that NEPA requires in an EIS depends upon the nature and scope of the proposed action." *California v. Block*, 690 F.2d 753, 761 (9th Cir. 1982) The focus of the EIS is on the proposal as the agency defines it. *Id.* The EIS should provide for evaluating the proposed plan's benefits and environmental costs and for comparing the Plan with the alternatives. *Natural Resources Defense Council v. Morton*, 458 F.2d 827, 833 (D.C. Cir. 1972); *see, National Parks and Conservation Assn v. Babbitt*, 241 F.3d 722, 732 (9th Cir. 2001). The EIS should serve the crucial purpose of providing the public with information on the environmental effects of proposed plans, thereby encouraging informed public participation in agency decision-making. *Trout Unlimited v. Morton,* 509 F.2d 1276, 1282 (9th Cir. 1976)*; see Coalition for Canyon*

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[4]Forest Supervisor Gaffrey is quoted as stating that "[w]e're changing the current direction as far as the level of mechanical treatment (logging) that is allowed. We're allowing it to be more active, and that means trees of larger sizes -- up to 30 inches -- could be removed. We do have giant Sequoias that are small, that are up to 100 years old, that need thinning. So there could be thinning of giant Sequoia trees, yes." To the extent that these statement reflect the plan direction (which we cannot fully discern from the DEIS), they are not consistent with the MSA or the Proclamations. *See* The Bakersfield California, 12/6/02.

Preservation v. Bowers, 632 F.2d 774, 782 (9th Cir. 1980). The DEIS must permit those who do not participate in its preparation to understand and consider meaningfully the reasoning, premises, and data relied upon, and to permit a reasoned choice among different courses of action. *Friends of the River v. FERC*, 720 F.2d 93, 120 (D.C. Cir. 1983). The parameters of the environmental review, of the discussion of alternatives, and of the detail of the discussion itself is defined by the proposed action.

Where, as here, the proposed action is not properly described, the environmental review lacks value. This is a profound, overriding deficiency, in violation of NEPA. Without the actual plan or a detailed description, the "proposed action" identified in the DEIS is meaningless. The DEIS states:

> The proposed action recommends the establishment of new or modified desired conditions and management goals for key resources in the Monument. To realize those desired conditions and meet those management goals, it also proposes the designation of new management areas (MAs) within the Monument and their associated management emphases, standards, and guidelines.
>
> The term "proposed action" is not synonymous with another term used in environmental impacts statements, "preferred alternative." DEIS at I-6.

The DEIS then describes the Proposed Action Alternative in broad strokes. DEIS II-15 to 22. It mentions restoration and protection strategies, without any detail, and identifies three management areas. It proposes no standards and guidelines for any of those areas. It presents general goals without any statement of what actions will be taken to meet the goals. For example, for General Monument Lands it will "encourage scientific research" and "reduce fuel loads," but presents no information as to how it will meet these or any other of its stated goals. Without specific description of actions and implementation, the general discussion of the Proposed Action is not helpful.

The consequences of failure to describe the proposed action in more than very general terms are numerous. For example, without a properly defined project, the reader has no way to compare alternatives and their different impacts. The following is typical of the level of discussion of impacts of alternatives set forth in the DEIS. This one concerns fire and fuels.

> Alternatives 1, 2, and 5. These alternatives would be very similar in their effects because the management direction is similar, except that in Alternative 5, in the giant sequoia groves, greater flexibility is provided to manage vegetation. These alternatives would not have as much flexibility as Alternative 6 to create stands that are closer to the desired conditions, but are more likely to create stands closer to desired conditions than are Alternatives 3 and 4. This is because mechanical treatments in conjunction with prescribed fire, would reduce the risk of undesirable effects from prescribed fires, such as impacts to wildlife habitat or reduced protection to communities or objects of interest.

> Alternatives 1, 2, and 5 provide for this combination of treatment methods, but not to the same degree as Alternative 6. DEIS at IV-15.

Without a description of the actual plan, these comparisons are meaningless. What is the greater flexibility to manage vegetation through "mechanical treatments"? "Mechanical treatments" appears to be a euphemism for timber harvesting. The DEIS does not describe what mechanical treatments will be used, to what extent, and with what consequences. In addition, if 3 of the 6 alternatives are basically identical on what is probably the most important issue for management of the Monument (fire treatment), it is hard to imagine that the range of alternatives is sufficient for any meaningful consideration of environmental impacts of different actions. The bottom line, however, is that without knowing what the Forest Service's actual proposed plan intends, no evaluation and no comparison is possible.

The absence of a description of the proposed action impacts the sufficiency of the entire DEIS. Without the description, the DEIS the reader cannot understand either the actions proposed or the environmental impacts of either the proposed action or the alternatives.

While the absence of project description is over-arching, we also note the following deficiencies:

1. The DEIS states that the Proposed Action Alternative "does not specifically address the significant issues found in Chapter I because the issues were developed largely based on public comments to this proposed action." DEIS at II-15. This statement makes no sense. As best we can discern, the Forest Service identified issues of concern to the public but did not modify the Proposed Alternative or address the issues in response to those concerns. One of the primary purposes of the DEIS is to address the public's concern. We do not understand why the issues identified by the public were not addressed.

2. The DEIS describes the 900 miles of roads in the Monument. DEIS at III-140 and IV-85. It notes that road maintenance funds are insufficient for all roads. The DEIS fails to address three basic issues: what is the environmental impact of different road regimes (maintaining, for example, 300 miles of roads versus 900 miles); what is the environmental impact of the roads themselves (such as increased sediment loads and watershed degradation); and what criteria will be used to determine if new roads shall be added?

3. We addressed above the impropriety of the DEIS discussion of timber harvesting levels and employment for loggers. In addition, the DEIS fails to discuss in any manner the impact of different "mechanical treatment" regimes, of different mechanical entry (road) regimes, of different timber harvest levels, of increased noise levels. On these very important environmental and management issues, the DEIS and the project description are silent. *See* DEIS at IV-83.

4. The DEIS sets forth timber harvest levels for the various alternatives at IV-83. The

Forest Service uses the million cubic feet measure. Historically, the Forest Service has used the more typical million board feet measure for timber. Here, the DEIS does not provide a cubic foot/board foot conversion. The use of the cubic foot measure without a conversion is misleading. The specific number of million cubic feet is lower than the specific number of million board feet. (E.g., 1 million cubic feet converts to approximately 5 million board feet). It appears that the Forest Service is using the cubic foot measure without reference to board feet to preclude direct comparison to the board feet measure used in previous Sequoia planning documents.

5. The DEIS addresses fire and fuel generally, but once again fails to compare different approaches to fuel loads with any real analysis of the different impacts of different approaches.

CONCLUSION

The Management Plan for the Sequoia National Monument is an extremely important document for all Californians. It holds the key for the future of the Giant Sequoia Groves and all of the lands of the Monument. The Forest Service has failed to present the public with the actual proposed Management Plan and has therefore precluded meaningful public review and input. This is not only a major disappointment, but a clear violation of NEPA. In addition, the Forest Service's proposals (as best they can be discerned) for the Groves and for timber harvesting and road building violate two Presidential Proclamations and the Mediated Settlement Agreement. We strongly encourage the Forest Service to withdraw the DEIS, issue the actual proposed Management Plan, to incorporate the requirements of the Proclamations, and to complete a full and fair environmental analysis.

Thank you for the opportunity to comment on the DEIS.

Sincerely,

KEN ALEX
Supervising Deputy Attorney General

For BILL LOCKYER
Attorney General

Washoe Tribe of Nevada and California

March 5, 2003

Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

Dear Mr. Whitfield,

The Washoe Tribe of Nevada and California has serious concerns with the draft management plan for the Giant Sequoia National Monument. This draft plan completely ignores the clear language in the proclamation that states that monument lands are not to be opened for commercial logging operations and proposes instead to "protect" this monument with extensive logging – even in groves of the ancient giants.

We are adamantly opposed to Alternatives 2, 3, 5, and especially 6, the Service's preferred alternative. It fails to honor the most basic requirements of the monument proclamation and has the least accountability.

The only alternative in the draft plan, which does not call for major logging, is Alternative 4. It most closely follows the original proclamation. We suggest you propose adopting Alternative 4 because it: 1) has two sensible management zones, one for those areas of high human use and another with an integrated ecosystem approach, 2) it allows tree removal only for fuels reduction in areas near structures and where human safety is most important, 3) it relies on hand thinning and prescribed and natural burning as primary management tools, and 4) it allows increased non-motorized recreation and keeps the historic trail network intact.

It is the Forest Service's duty to protect and restore the forest ecosystem, wildlife, geologic formation, paleontological resources and archaeological sites. Please adopt Alternative 4 of the Draft plan as it best protects these critical resources.

Sincerely,

A. Brian Wallace, Chairman

Cc: Senator Barbara Boxer, Senator Dianne Feinstein, Jason Swartz, WEPD file, Greg Phillips, EPA

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

April 7, 2003

Jim Whitfield, Team Leader
Giant Sequoia National Monument
900 West Grand Avenue
Porterville, CA 93257

Dear Mr. Whitfield:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Giant Sequoia National Monument Management Plan,** Fresno, Kern, and Tulare Counties, California (CEQ Number: 020500). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. We appreciate the two-week extension granted for submission of our comments.

The USDA Forest Service has developed this DEIS to analyze six alternatives for management of the Giant Sequoia National Monument. The Forest Service has designated Alternative 6 (Theme--Manage entire Monument with the widest range of management strategies) as its preferred alternative.

EPA has two concerns with the preferred alternative. First, we are concerned that Alternative 6 replaces specific land allocations and standards and guidelines derived from the Sierra Nevada Forest Plan Amendment with less-specific management guidelines. Second, we are concerned that the preferred alternative does not include specific road decommissioning targets and an implementation plan that responds to continuing environmental impacts identified in the Roads Analysis (Appendix D).

While we applaud the Forest Service for developing specific proposals to address the management of Giant Sequoias in the Monument, we are concerned that the Forest Service's preferred approach for managing the remainder of the Monument will result in impacts to old forest habitat and water quality. The preferred alternative's proposal to move some areas from an "old forest emphasis" to a "general" land allocation and to increase the diameter limit for harvest to 30 inches dbh (diameter at breast height) is not supported by the DEIS. Pending the

completion of a Supplemental EIS for the Sierra Review Team's recommendations allowing the harvest of trees up to 30 inches dbh, the best available information is embodied in the Sierra Nevada Forest Plan Amendment EIS and Record of Decision. EPA recommends incorporating any new information and analyses from the Sierra Nevada Forest Plan Amendment Supplemental EIS into the Final EIS for the Giant Sequoia National Monument management plan. We are also concerned about the preferred alternative's approach to the existing transportation system, which perpetuates sedimentation impacts and habitat fragmentation. These concerns form the basis for our recommendation that the Forest Service incorporate measures to protect resources of concern into the preferred alternative, as described in our detailed comments.

In light of the concerns outlined above, EPA has assigned a rating of **EC-2 (Environmental Concerns–Insufficient Information)** to the DEIS. Please refer to the attached "*Summary of Rating Definitions*" for further details on EPA's rating system. EPA appreciates the opportunity to comment on the DEIS. Please send a single copy of the Final EIS for this project to the address above (Mail Code: CMD-2) when it is filed with EPA's Washington, D.C. office. If you have any questions, please feel free to contact me or Leonidas Payne at 415-972-3847 or *payne.leonidas@epa.gov*.

Sincerely,

Lisa B. Hanf

Lisa B. Hanf, Manager
Federal Activities Office

Attached: Summary of EPA Rating Definitions
Detailed Comments

Detailed comments on Giant Sequoia National Monument Management Plan Draft EIS, April 7, 2003

Modification of Land Allocations and Standards and Guidelines from Sierra Nevada Forest Plan Amendment

EPA has been involved in the Sierra Nevada Framework effort since its inception in February 1998. The Sierra Nevada Forest Plan Amendment Record of Decision (ROD) adopted a comprehensive set of land allocations and standards and guidelines for Forest Service lands in the Sierra Nevada. We recommend that the Sierra Nevada Forest Plan Amendment decision be implemented as issued, except in cases where: 1) specific resources (such as Giant Sequoia groves) would benefit from more specific, prescriptive standards and guidelines; or 2) a change in direction is supported by evidence developed through a comprehensive monitoring program in the context of adaptive management.

EPA supports the adoption of more specific land allocations and guidance addressing lands within and immediately adjacent to Giant Sequoia groves, as described under Alternative 6. However, Alternative 6 seeks to remove certain land allocations and standards and guidelines, particularly those related to diameter limits in old forest emphasis areas, in response to a concern about fuels. The Forest Service has not provided sufficient information to support the removal of protective land allocations and standards and guidelines in old forest areas outside the groves. Pending the completion of a Supplemental EIS for the Sierra Review Team's recommendations allowing the harvest of trees up to 30 inches d.b.h., the best available information is embodied in the Sierra Nevada Forest Plan Amendment EIS and ROD. EPA recommends incorporating any new information and analyses from the Sierra Nevada Forest Plan Amendment Supplemental EIS into the Final EIS for the Giant Sequoia National Monument management plan. The land allocations and standards and guidelines outlined in the Sierra Nevada Forest Plan Amendment Final EIS and ROD should be retained until further information is available.

In addition, the description of applicable land allocations and standards and guidelines among the various alternatives is confusing. For some alternatives, land allocations and applicable standards and guidelines *to be retained* are listed. For others, land allocations and applicable standards and guidelines *which would not apply* are listed. EPA recommends a consistent approach be used to present comparative information, including a table which lists all the potential land allocations and standards and guidelines described in the Sierra Nevada Forest Plan Amendment and the Giant Sequoia National Monument management plan, and identifies those that apply to each alternative.

Continuing Transportation System Impacts

The Roads Analysis developed for this management plan describes the impacts of the transportation system upon water quality: some roads are causing negative impacts and are not needed, yet only two of the action alternatives, Alternatives 3 and 4, propose to reduce transportation system mileage in the Monument. The remainder of the alternatives, including the

preferred alternative, retain the status quo of road mileage, and provide limited guidance for addressing ongoing problems. We urge you to take action regarding the transportation system to minimize impacts upon water quality.

The development of the management plan for the National Monument provides the perfect opportunity to define the minimum road network necessary for management, and to develop an implementation plan for addressing existing problems and moving towards this minimum network within a reasonable period of time. This is important and should not be left to subsequent project level planning, as suggested on page III-146. We expect that the "minimum system" will vary depending on the actions proposed under the various action alternatives, but we would expect that all the action alternatives would include commitments to decommission roads that are causing negative impacts and are not necessary for administrative needs at the earliest possible opportunity. We further recommend that an implementation plan be included in the Final EIS and ROD which clearly identifies priorities, sets a schedule for decommissioning unnecessary roads, and provides an estimate of costs.