

360/0013

I recommend a stricter policy for forest management so that those few remaining wild rivers are protected under any and all circumstances. I feel that the Forest Plan Alternative D provides a more protective policy than Alternative A.

*Alternative A recommends 222 miles be included in the Wild and Scenic System. Alternative D recommends 163 miles. If your objective is to protect the rivers, then we assume your preference would be the stricter recommendation which is Alternative A. See response to 360/0005.*

360/0218

I hope you will give wild and scenic status for portions of San Joaquin River.

*Portions of the main San Joaquin River, North Fork San Joaquin River, Middle Fork San Joaquin River, and portions of the South Fork San Joaquin River will be recommended for designation in the W/S river system in the preferred alternative.*

360/0307

The Forest Plan has excellent wild and scenic river recommendations. I support protection for North Fork San Joaquin River, South Fork Merced River and the entire main Merced.

*Thank you for your support concerning the Forest's W/S river recommendations. See response to 361/0219.*

360/0349

I am opposed to the Forest Service Plan to make 73 out of 75 miles of river in the Forest "wild and scenic." I think that the Forest Service needs to give more consideration to what the tax paying citizens in general think about the forest and not jump every time the Sierra says frog.

*We are sorry you are opposed to the recommendations. However, there was overwhelming public support for the Preferred Alternative's position on W/S Rivers. See response to 360/0005.*

360/0453

The Plan, concerning WSR called for inclusion of 73 miles in the Forest as part of expected 225 miles does not seem desirable. Currently, there is such distrust of atomic energy plants it does not seem likely they will be viable alternatives for production of electrical energy in the future. Since oil and coal fired steam plants produce undesirable by-products, that leaves one currently viable source of electrical energy, hydro projects.

*The Forest at present has more major hydroelectric projects than any other National Forest in California. The recommendations would give the Forest a good balance of scenic rivers, while retaining existing hydroelectric resources. See response to 360/0349.*

360/0590

I support the W/S classification of South Fork Merced and North, Middle and Main Forks San Joaquin River. The section of Merced between Briceburg and Lake McClure is especially deserving of protection.

*See response to 361/1533 and 361/0219.*

360/0691

Future water needs of Mariposa County would be locked up with the proposed WSR plan. We recommend no WSR designation.

*The Preferred Alternative will show the Merced as a Wild and Scenic River for approximately 71 miles from the headwaters within Yosemite National Park to a point 300 feet upstream of the confluence with Bear Creek on BLM lands. This will be in accordance with the 1987 Congressional Act. We understand the county's water needs below this point. The original Merced River recommendation was for a total of 82 miles.*

360/0778

I support the recommendation for W/S designations for South Fork, Middle Fork, and North Fork, upper San Joaquin, Middle Fork Kings, and South Fork and main Merced Rivers, and opposition to power plant projects there.

*Thank you for your support.*

360/0808

I would like to see W/S studies for all appropriate segments of South, Middle and North Forks San Joaquin and upper San Joaquin, Middle Fork Kings and South Fork Merced.

*Studies for these rivers have been completed and will be shown in the Preferred Alternative After Congressional designation, site specific environmental analysis and documentation, apart from this Forest Plan, will also be completed. See response to 360/0005.*

360/0849

My sincerest applause for your support of the W/S recommendations I am a director of the Peregrine Fund which for the last 10+ years has released captive bred peregrine falcons into the wilderness. Incidentally, the Upper King River Canyon is an important part of this habitat.

*The peregrine falcon and other wildlife species will have guaranteed preservation of communities under the W/S designations. The Kings River area has been established under a Congressional Act of 1987 as a Special Management Area, which should give wildlife species added protection*

360/0851

We applaud your position on banning water and power dams on the wild and scenic rivers within your jurisdiction More can and should be done

*If the rivers are designated by Congress as Wild/Scenic, then development of hydroelectric power facilities will not be permitted The Merced and King Rivers have already been designated See response to 360/0005.*

360/0989

I agree with your recommendation to designate various river segments on the Forest for inclusion in the WSR system There are many miles which I feel would be suitable for inclusion in this system, but I believe the Preferred Alternative strikes a reasonable balance.

*The Forest analyzed 227 miles identified in the Nationwide Rivers Inventory of January, 1982 as potentially suitable for inclusion in the National Wild and Scenic Rivers System The Preferred Alternative will recommend 222 of these miles be included in the W/S System. In November 1987, Congress designated the Merced and Kings as W/S Rivers.*

360/0991

I would like to see all these rivers protected, not just segments

*All the rivers that are recommended by this LMP will be protected by Congressional acts if designated. The classification of the segments of wild, scenic, or recreational will be done by the administration agency. The estimated effects of these classifications differ with each segment See response to 360/0005*

360/1069

I would like to encourage you to do what you can to preserve San Joaquin, Merced and South Fork Merced Rivers

*We have recommended preserving these rivers through this LMP process by suggesting designations for 222 miles of potential W/S rivers. See response to 360/0989.*

360/1158

I am unable to respond adequately because the information presented does not include water power or irrigation reservations, mineral claims, water right diversions or vested and perfected water rights which must be purchased, or the location and value of private property. The main concern is that these river segments will be managed as WSR upon the approval of the Plan.

*The rivers will be managed as WSR when designated by Congress. Land ownership and use with quantity of mineral claims, value of private property and water rights are shown in the FEIS. See response to 360/0005.*

The Regional Forester, in a presumptuous and contemptuous manner, declares that the Merced, San Joaquin and Kings River segments shall be WSR now. To hell with the authority of the Congress, the President, the Secretary of Agriculture. Forest Dictator Zane Smith has spoken, so it shall be. Whenever this type of tyranny raises its ugly head it should be struck down in order to preserve the freedoms of our constitutional democracy. I conclude this action is willful and unlawful.

*The Forest recommends wild and scenic rivers through this LMP. The Congress designates the rivers according to the Wild and Scenic Rivers Act of 1968. The Secretary of Agriculture administers the rivers that are within the department's boundaries. This is the established constitutional system.*

360/1160

I support rivers for W/S status. Let us find other clean sources of power generation, rather than hydro-projects

*See response to 360/0851*

360/1195

Thank you for your W/S recommendation, especially those prohibiting more dams. Please set aside some of the unmatched and irreplaceable Sierras into a roadless wilderness.

*See response to 375/0989, especially the paragraph concerning the roadless wilderness issues.*

360/1223

I can appreciate the interests of the timber, mining, livestock, and water developers, yet we must not sacrifice forever a God-given treasure for a short term commercial gain. On behalf of posterity, the Forest WSR recommendations are applauded

*Thank you for supporting the W/S recommendations. The Preferred Alternative is recommending approximately 71,000 acres be included with the 222 miles of rivers. The Forest will administer about 24,000 acres adjacent to approximately 75 miles of river on Forest lands. Other agencies will administer the remaining 47,000 acres*

360/1230

I support W/S recommendations and hope you will include the Upper Kings River Canyon as wilderness. I would give up a lot of my electrical conveniences and be more restrictive in my water use to have one less dam and keep the rivers wild.

*Thank you for your support. The Middle Fork, South Fork, and portions of the main Kings River have been designated by a 1987 Act of Congress as a Wild and Scenic River. Also, by an Act of Congress, the Kings River Canyon area has been designated a Special Management Area. The disposition of this area, referred to in the DEIS, has been resolved and will be managed similar to a primitive/wilderness area*

360/1418

I agree with the Forest Plan's designation of 1/4 mile corridors on either side of a WSR. This is probably the strongest, most desirable aspect of the Preferred Alternative.

*The Wild and Scenic Rivers Act states that an average of not more than 320 acres of land per mile will be managed. This means there are about 320 acres per mile and the Forest has approximately 24,000 acres along 75 miles of river that will have to be managed under WSR criteria.*

360/1484

There should be a reduction in the number of miles recommended for W/S classification.

*A reduction in the number of miles recommended for W/S classification was considered in Alternatives B, C, D, and H. The Preferred Alternative will recommend 222 miles be included in the W/S river system.*

360/1520

We commend studies to determine whether rivers are eligible for inclusion into WSR System. We support the recommendations for designation of segments of the Kings, Merced, and San Joaquin Rivers for WSR status. Forest should make the following determinations and include them in the Final Plan. Decide whether a river is eligible for national designation, and declare what classification it would have, if designated.

*The Forest decided if a river was eligible for national designation by analyzing seven rivers identified in the 1982 National Wild Rivers Inventory. The Forest completed eligible classifications for a total of 224 miles of rivers with about 75 miles being within the forest boundaries. These efforts were coordinated with two national parks, the BLM, one national monument, the national forests, and various public environmental groups*

360/1537

American Alpine Club is pleased to submit comments on the Proposed Plan. Good Points: WSR would prevent severe objectionable hydroelectric projects. We are concerned about diversion of the Merced below Yosemite Valley ("El Portal" Project) and dam at Hemlock Crossing or North Fork of San Joaquin, within the Ansel Adams Wilderness. We appreciate the clear discussion of roadless areas and disposition and map in Appendix H. No other is so forthright.

*Thank you for your comments concerning the LMP WSR recommendations. The Merced River has been designated a Wild and Scenic River by a Congressional Act of 1987. No Hydroelectric projects will be allowed. See response to 370/1540 concerning the Hemlock Crossing issue. A hydroelectric project could be allowed under the Wilderness Act, however, an acceptance of the Forest's "Wild" designation could prohibit this project. See response to 375/0283 for discussion of the roadless areas*

360/1541 & 1381

A bright point in the Plan is the recommendation that portions of seven rivers, some 220 miles, be designated WSR. However, the Kings River above Rogers Crossing should be included in the recommendation as well.

*The Forest was not responsible for the recommendations concerning the main Kings River. However, this area has now been designated a Special Management Area by an Act of Congress (1987) with administration responsibility given to the Forest.*

360/1595

Some changes I would like to see adopted in the final plan: Kings River should be designated as a WSR. Kings River Canyon and Mt. Raymond Areas should be designated as a Wilderness. Merced River Canyon should be a dispersed recreation area. Merced River below Briceburg should also be considered for a WSR designation.

*A portion of the main Kings has been designated a W/R and a 49,000 acre area has been designated a Special Management Area by a 1987 Act of Congress. The Preferred Alternative will show the 6,850 acre Mt. Raymond area as dispersed recreation - no scheduled harvest area. The South Fork Merced which runs through the Mt. Raymond area, has been designated as a WSR by Congress, and there will be no regulated timber harvesting within the river corridor. The Merced River below Briceburg was eligible for classification and was considered for WSR designation.*

360/1647

We would like to take exception to your intention stated in the Plan pg.3-5 Sec. 3.6, which states that "...unless Congress acts on these designated river recommendations, no management activities will take place that preclude designation " In light of DEIS pg.4-17 Sec. 4.4.2 we consider this as being stalled long enough, unless the intention is to prevent the project by simply stalling forever.

*The 100th Congress has acted on the disposition of the Merced, South Fork Merced, Middle Fork Kings, South Fork Kings and portions of the main Kings Rivers by designating these as wild and scenic rivers As stated in the Wild and Scenic Rivers Act of 1968, the final LMP will indicate that rivers under study will retain wording like, "no management activities will take place that preclude designation "*

360/1658

I support Alternative A for W/S designations of the Merced River. Segment 7 on the South Fork should be classified scenic only, and wild from Hite Cove to the private property. S&G 229-232 are supported for management

*Thank you for your support Segment 7 on the South Fork will have a "scenic" recommendation. A new Segment 8, about one-half mile downstream from Hite Cove to the Merced/South Fork Merced confluence, will have a "wild" recommendation. However, the final disposition of these classifications will be determined through an Environmental Analysis apart from the Forest Plan. We have three years from the time Congress passed the act in November, 1987 to complete these WSR plans. More analysis and public involvement will have to be completed at the Forest level. We will consider your comments and implementation of Draft Plan S&Gs #231-234 for the Merced, South Fork Merced during this planning phase.*

360/1683

I'd like you to adopt Alternative E - the Amenity Alternative! However, Alternative E does not designate (rather call for designation) the entire main fork and south fork as WSR and I think it should

*The Preferred Alternative recommends 222 miles of river be designated. Alternative E, the Amenity Alternative, recommends 224 miles of river be designated, which is 99% of what you would like. See response to 360/1647*

360/1684

I support Alternative A, although E would be even better. I am particularly concerned about hare-brained hydro schemes which could negatively affect the pristine canyons forever, like KRCD's proposed Rogers Crossing dam or plans for the main Merced River Canyon between Briceburg and Portal

*Thank you for your comment. See response to 360/1230 and 360/1595*

360/1700

We support the Forest Service in adopting the excellent WSR recommendations. We commend the Forest Service for its pivotal cooperation and coordination with other agencies in preparing a comprehensive protection plan for each river, including lands outside Forest boundaries

*We received excellent support and cooperation from other federal agencies, state and private environmental, resource and utility management groups. These groups contributed by reviewing and commenting on the early WSR preliminary drafts The LMP documents showed the results of these efforts.*

360/1702

An increase in the volume of timber could be made with a reduction in the number of miles of rivers recommended for "Wild and Scenic River" classification

*Wild and Scenic River proposals did not reduce timber harvest in the Preferred Alternative.*

360/1704

I am writing concerning the proposal to recommend WSR status for Merced, South, North, Middle and upper San Joaquin, Middle Fork Kings, and South Fork Merced, and wilderness status of upper Kings River Canyon. I support development of these types of natural areas

*Thank you for your comment. See response to 360/1647.*

360/1775

I support your proposals for WSR designations. I would like to see some of the segments upgraded from scenic to wild and from recreational to scenic and wild. Segment 7 of the South Fork Merced is one such section that should have most of it upgraded from scenic to wild. I would like to see parts of Segments 6, 7 and 9 of the main Merced upgraded to wild or scenic. I would especially like the lower section of Segment 9 made wild or scenic.

*Thank you for your support. Congress has designated the South Fork and the main Merced as W/S rivers. The disposition of the segments will be determined through an Environmental Analysis apart from the Forest Plan. We will examine your recommendations during this planning process. See response to 360/1658*

360/1797

We do not oppose or support WSR designations, although we recognize them to be strongly supported by environmental groups and opposed by water and dam user groups. We are opposed to adding to WSR. The protection should be limited to 1/4 mile of each side of the river and no more. Established 4WD access points and river crossings should be, and can be, provided for in a W/S river legislation management plan, such as on the middle fork of the Feather River.

*OHV motorized travel on land or water may be permitted, prohibited or restricted to protect the river values within the 1/2 mile river corridor designated as W/S. Project work and river management plans will detail these management controls. See response to 360/1775.*

360/1841

With a proposed 225 miles of W/S rivers, that places full control of the water to the discretion of the U. S. Congress, thereby removing any former existing water rights on the land and the lands within 1/4 mile of the river. In other words, what is going to happen here is if Congress decrees W/S status on the river, if Los Angeles needs the water more than we do, we are going to have another Owens Valley.

*Major diversion of water is not permitted under congressionally designated W/S rivers.*

## 361-MERCED RIVER

361/0017

I endorse the Forest plans proposal for wild and scenic status for Merced River. A motorcycle trail to the South Fork is a move which appears inconsistent with the aim of the plan.

*Thank you for your comment. See response to 360/1797 concerning motorized travel*

361/0021

I support retaining only those elements that keep the "wild" status of Merced River including South Fork Merced.

*Approximately 44% or eight segments of South Fork Merced and Merced River will be recommended "wild". The highest eligible classification of the remaining segments is "recreational" or "scenic." See response to 360/1658.*

**361/0052**

I support making Merced River wild and scenic.

*Congress agrees with you. See response to 360/1230.*

**361/0063**

Mariposa County's interest is mentioned on Appendix page 7-80 as having a desire to withdraw water from Merced or South Fork Merced. It's impractical for Mariposa, but could put an end to the destruction of the resource area by larger wealthier entities.

*Thank you for your comment*

**361/0078**

Appendix pg 7-77, describing Merced River and Lake McClure, needs clarification of some statements made in the document as shown on the included maps. Normal maximum water surface elevation of Lake McClure is 867.0 and not 860.0. The new Exchequer Spillway Design Flood Pool is at elevation 873.3 Merced Irrigation Dist FERC No 2179 boundary ends upstream and crosses the river at the north line of Sec 1T 4S., R17E., M.D B. & M.

*We agree, the Preferred Alternative will clarify "to Lake McClure" by saying, "to point of maximum flood control storage of Lake McClure " The recommended mileage for Merced River will be reduced from 82 0 to 79 0 in the LMP as a result of this change. The 1987 Congressional Wild and Scenic River Act for Merced River however, will consist of approximately 71 miles and end at a point 300 feet upstream of the confluence with Bear Creek.*

**361/0181**

We are concerned with preservation of Merced River, and support the Forest Service recommendation that the entire 82 miles from the Merced's headwaters be designated as W/S. We believe the Forest Service proposal represents a fair and accurate appraisal of the public resource values of a free-flowing river.

*Thank you for your support. See response to 360/0691.*

I believe that Segment 10 of Merced River contains more "outstanding remarkable" value than those identified by the Forest Service. The scenic and geologic values of Quarter Mile Rapid and North Fork Falls are, in our opinion, outstanding and remarkable. The subtle cause-and-effect relationships between geology and whitewater is evidenced more dramatically here than at any other site we know of in California.

*The "outstanding remarkable" values for Segments 9 and 10 for Merced River were given to the Forest Service by the BLM, who has the administrative responsibility for these segments. The Preferred Alternative will show Segment 10 as "outstanding" if BLM concurs.*

**361/0219**

Merced River should be designated wild and scenic and recreational river from their headwaters in Yosemite National Park to the high water mark on Lake McClure Reservoir.

*Merced River has been designated as a Wild and Scenic River from the headwaters in Yosemite National Park to a point 300 feet upstream of the confluence with Bear Creek on BLM lands. The original LMP recommendation was to the high water mark on the Lake McClure Reservoir (Appendix pg 7-114).*

**361/0395**

I recommend Merced River be designated as a national wild and scenic river. This recommendation is threatened by the El Portal Dam Project. I urge you to prevent FERC from granting this license.

*Merced River has been designated. See response to 361/0219.*

**361/0755 & 0024**

I recommend protection of the entire Merced River including the lower part between Briceburg and Lake McClure

*Merced River has been designated by an Act of Congress. See response to 361/0219*

**361/0777**

I would like to applaud the Forest for it's W/R recommendations, especially those that will preclude water and power dams under consideration for Merced, South Fork Merced, and North Fork San Joaquin Rivers.

*Thank you for your support*

**361/0861 & 1786**

The Merced canyons should be designated dispersed recreation - no timber harvest. Special areas must be protected'

*We have made the change you suggest Management Area 2 is now dispersed recreation - no timber harvest.*

**361/0963**

The recommendation for WSR status for Merced River is to be commended.

*Thank you for your support.*

**361/0985**

I applaud your Plan for including Merced River as a WSR.

*Thank you for your support.*

**361/1226**

I am writing to express my appreciation for the efforts of the Forest toward giving W/S status to segments of the Merced River.

*Thank you for your support See response to 360/1700.*

**361/1271**

I strongly support the W/S designation for Merced River

*Merced River has been designated See response to 361/0219.*

**361/1285**

I support Alternative A for Merced River watershed except the W/S designation for Segment 7 on South Fork Merced River Segment 7 on South Fork Merced River, in my opinion, is generally inaccessible to motor vehicles and should be recommended for wild designation, not scenic.

*Thank you for supporting the Preferred Alternative for the W/S rivers. The disposition of Segment 7 on South Fork Merced Rivers will be determined through an Environmental Analysis apart from the Forest Plan.*

**361/1291**

I oppose any proposed designation of Merced River under the WSR system upstream of the Yosemite Park boundary.

*The 100th Congress has acted on the disposition of Merced River within Yosemite and downstream of the Yosemite Park boundary.*

**361/1302**

I urge you to do all you can to have Merced River flow free and unimpeded, from its headwaters to Lake McLure.

*See response to 361/1642.*

**361/1305**

We are delighted to hear that you are recommending WSR designations for San Joaquin and Merced Rivers.

*We have recommended and Congress has already designated portions of Merced and King Rivers. See responses to 360/1647.*

**361/1343**

A reservoir at Yosemite Park's entrance, taking away the cascading Merced will be terrible.

*There will be no reservoir at the Yosemite Park entrance as a result of the W/S designation for this portion of Merced River.*

**361/1369 & 0015**

I feel South Fork Merced River should be designated wild, not scenic, from Hites Cove to the private property line at Savage's. Secondly, designating Iron Creek Trail as a 2WD trail is unacceptable. It is in conflict with your proposed wild designation of the river as the trail parallels the river within 1/4 mile of its channel. Promoting 2WD use on that trail would mean that hikers and equestrians would be excluded. Iron Creek Trail is a historic trail and should not be denigrated by designating it a 2WD trail.

*South Fork Merced River has been designated as a wild and scenic river. Classification and use of Segment 7 will be determined through environmental analysis apart from the Forest Plan. The Iron Creek 4WD Trail will be a part of that analysis. This trail issue (acceptable use vs. unacceptable use) will be resolved in the Environmental Analysis and displayed in a management plan.*

**361/1382**

I am particularly pleased with the recommendation for designation of Merced and South Fork Merced as WSR. Segment 7 of the lower section of South Fork Merced has been classified scenic. It is entirely deserving of wild status, and full protection is necessary to keep the area as it is. Scenic classification would allow the intrusion of mining, which would significantly reduce the wild nature of the area.

*We are glad you are pleased with the recommendations. Merced and South Fork Merced Rivers have been designated by public law as Wild and Scenic Rivers. Your recommendation to classify Segment 7 of South Fork Merced "wild" instead of "scenic" will be determined through an Environmental Analysis apart from the Forest Plan. See response to 360/1658.*

**361/1390**

In Appendices pg. 7-79 under "Flow Data: Merced River near Briceburg," the drainage area above gage, is given as 6,901 sq. mi. The drainage area at Briceburg must be less than at Bagby, which is given as 912 sq. mi. A check with the U.S.G.S. office in Merced shows the Briceburg drainage area to be 691 sq. mi.

*Thank you for finding this error. The Preferred Alternative will show 691 square miles.*

The map of Merced River on page 7-91 places the lower boundary of the WSR study corridor at the 837 foot elevation contour. The elevation of the ungated trailway is 868 feet. It is customary to define the terminus of a WSR corridor at the contour which coincides with the high water mark at the maximum flood control storage capacity. Although at the maximum design discharge capacity of 375,000 cfs, the lake level would be at 879.2 ft. This would be an ephemeral condition and is not reflective of maximum storage capacity.

*The map in this Appendix and all references to Lake McClure will be changed to "to the point of maximum flood control storage of Lake McClure." See response to 361/0078.*

**361/1416**

Alternative A is the most workable alternative with the following qualification: Segment 10 on Merced River should have the western boundary clearly defined as being contiguous with the maximum potential water storage elevation of Lake McClure, as depicted on Merced Irrigation District

*The Preferred Alternative will show the Segment 10 western boundary and the references to Lake McClure as indicated on the Merced Irrigation District maps as contiguous with the maximum floor control storage of Lake McClure.*

We view Alternative A of the draft as the most workable alternative, with the following qualifications Segment 10 on Merced River appears suitable for scenic designation rather than wild, based on the suitability/eligibility guidelines of the Wild and Scenic Rivers Act.

*According to the classification/eligibility analysis completed for Segment 10, this portion qualifies as "Wild " This means all questions relating to the classification criteria had to be answered, "Yes." All of them were. For example, for Criteria 1, the questions were: Free of impoundments? Yes Generally inaccessible except to trail? Yes Watershed/shoreline essentially primitive? Yes. Waters unpolluted? Yes. These answers have been confirmed by the responsible agency, the BLM.*

**361/1511**

The goal of the Merced Canyon Committee, to secure WSR status for the main stem of the Merced River to Lake McClure, has been well publicized. This goal coincides with the recommendation in Alternative A I want to convey my support of the recommendation.

*The Preferred Alternative will show Merced River as a W/S river for approximately 71 miles, from the headwaters within Yosemite National Park to a point 300 feet upstream of the confluence with Bear Creek on BLM lands. This will be in accordance with the 1987 Congressional Act for this river The goal of the Merced Canyon Committee has basically been met.*

**361/1512 & 0219**

We support the emphasis in the plan of protecting Merced River and South Fork Merced in the WSR system We are concerned that the South Fork Merced, an important wildlife habitat for Yosemite's deer herd and the part of main stem viewed by park visitors be protected. We urge the Forest Service to ask FERC to delay action on the proposed El Portal project.

*Both Merced and South Fork Merced have been designated W/S rivers by an Act of Congress See response to 360/1230*

**361/1533**

Merced River outside Yosemite National Park boundaries has been threatened, and should be strongly supported for inclusion in the WSR system. The conservation alternative concurs with all the comments and recommendations of the Merced Canyon Committee in its official response to the Plan with regard to this river

*Thank you for concurring with the W/S river recommendations for Merced River South Fork Merced and Merced Rivers have been designated by an Act of Congress as wild and scenic rivers. See response to 360/0691*

**361/1558**

Please provide wilderness status and protection for Merced River.

*Designation of W/S status will provide protection for Merced and South Fork Merced Rivers. See response to 361/0219*

**361/1594**

I support Alternative E of the Forest Plan because of it supports of WSR status for South Fork Merced River

*Alternative A and Alternative E recommend the same classifications for South Fork Merced River.*

361/1642

Let me express my delight at the Forest's recommendation for a WSR Merced River. I ask that consideration for any proposed hydroprojects be held until Congress decides how to protect the river. Might I recommend that the section from Hites Cove to the private property line, 3/4 mile from the confluence with the main fork be classified wild rather than scenic.

*The river was designated by public law as a W/S river. The classification of the Hites Cove area on South Fork Merced River will be determined through an Environmental Analysis apart from the Forest Plan.*

361/1647

We recommend these changes in the proposed plan. "No designation" for the Merced River corridor. "No designation" for the section of river from Yosemite Park boundary to a point downstream of the proposed El Portal Powerhouse trailrace. This would facilitate all proposed and future developments. The inclusion of "grandfathering" provisions in any designation within Sections 6 and 7.

*The 100th Congress has acted on the disposition of Merced and South Fork Merced by designating these rivers as wild and scenic. See response to 361/0219.*

361/1707

I support your proposals which recommend classifying portions of Merced River as WSR.

*Thank you for your support. See response to 361/0219.*

361/1719

I would like to commend the Forest Service in their recommendation for WSR status for Merced River.

*Thank you for your comment.*

## 362-SOUTH FORK OF THE MERCED RIVER

362/0063

Hites Cove shouldn't be designated scenic. Your "wild" classification should extend to the private property line at Savages Trading Post. The Hites Cove Mine has been in default for 100 years. The two rough roads in the region do not parallel the South Fork. Therefore, they do not alter its characteristics sufficiently to warrant adopting scenic classification. I have misgivings about bridges on the south fork.

*The disposition of the W/S classification for this segment of South Fork Merced will be determined through an Environmental Analysis apart from the Forest Plan. See response to 360/1658.*

362/0279

Designate South Fork Merced as WSR and recreational rivers from their headwaters in Yosemite National Park to the high water mark of Lake McClure. Delay any approval of pending dam projects on the river until Congress has had the opportunity to act on the Forest's recommendations.

*Congress has designated the rivers. See response to 361/0219.*

362/0286

We support your proposed research natural area and proposed dispersed recreation management area.

*Thank you for your support.*

**362/0599**

We support the WSR recommendations for North Fork San Joaquin River, Merced River, and South Fork Merced River.

*Thank you for your support.*

**362/0600**

I wish to express my support for making Merced River South Fork Merced a WSR area.

*Congress has designated these rivers See response to 361/0219.*

**362/0777**

I would like to applaud the Forest's WSR recommendations, especially those that will preclude water and power dams under consideration for Merced, South Fork Merced and North Fork San Joaquin I support the conservation alternative

*Thank you for your comment See response to 360/1537*

**362/1161**

South Fork Merced River should be classified wild near Hites Cove. OHV use should not be encouraged on Iron Mt. Trail down to Hites Cove OHV use is not compatible with the "wild" classification Back country footbridges sound like a neat idea on the South Fork

*See response to 360/1658 for Hites Cove area See response to 360/1775 and 1797 for the OHV use*

**362/1163**

I support the WSR recommendations for two forks of Merced River I have seen an alarming increase in resource harvest, development and exploitation of Merced and North Fork San Joaquin.

*Thank you for your support.*

**362/1304**

I would like to see South Fork from Hites Cove to Merced River be designated wild, not just scenic, so that it will be protected from mining

*See response to 360/1658 concerning Hites Cove. New mining claims and mineral leases would be prohibited under the wild classification New mining claims and mineral leases could be allowed (subject to specific agency regulations) under the scenic classification.*

**362/1308**

We support the Forest's WSR recommendations for South Fork Merced.

*Thank you for your support*

**362/1315**

I was pleased to hear that your Plan is proposing WSR status for South Fork Merced

*Thank you for your comment*

**362/1316**

I support your designation of South Fork Merced as W/S

*Thank you for your support*

**362/1379**

First, I would like to express my support for the Plan proposal to provide W/S status to the Merced River South Fork I urge a more complete protection policy that would upgrade protection for the lower stretch of the South Fork (Hites Cove to the confluence with the main stem of the Merced

River). Please change the protection status from "scenic" to "wild." I also urge you to designate WSR to Lake McClure.

*Thank you for your support. We will examine your recommendations during a River Management Plan planning process. See response to 360/1775. The River from Briceburg to Lake McClure will be considered as a wild and scenic river by the BLM.*

**362/1390**

There is an ongoing campaign of innuendo that WSR designation of the entire river will foreclose the county's ability to obtain domestic water from the south fork. Development of domestic water from this source, whether the river is WSR or not, is foreclosed by economics.

*Thank you for your comment.*

Appendices pg 7-86 under "Flow Data: South Fork Merced River" ..(USGS Gage #11-2680, from 1950-1959 25 years). The 25 year period does not agree with the 1950-1959 dates. I believe the dates should be 1935-1959.

*Thank you for finding this error. Please note also that the flow data: for South Fork Merced River at Wawona shows "1911-1921: 6 years." We will change this to read "1911-1921: 10 years."*

Appendix Table E.058, the recommendation for Segment 7 of South Fork in Alt. A is scenic. This choice apparently results from the NO response to Table E.038 to the "Generally Inaccessible Except By Trail" criterion. The operational word here would seem to be "generally." My son has driven the Hites Cove Road and informs me that even for a 4WD vehicle, this is not a trip for the average driver to attempt. I would prefer to see this segment labeled "scenic."

*You are right! The reason the forest recommended this segment "scenic" is because the two existing 4WD mining roads extending down to this area from both sides (the south side 4WD road actually parallels the river for about a mile) of the river prompted a "No" answer for the "generally inaccessible except by trail" criterion in the classification analysis. In fact because of the existing old mining structures there could be a "No" answer for the "Watershed/shoreline essentially primitive" criterion in the classification analysis. However, based on your specific input and others who are concerned with this segment's classification, we will re-examine this classification. A possible strategy is to scale down this segment to approximately two miles and classify the remaining four mile portion as a "wild" segment. Here the analysis would indicate that there are only foot-trails close to the river, with no existing structures and therefore it would be eligible for a "wild" classification. See responses to 360/1658, 361/1369, 362/1304, 0015 and 0063.*

**362/1469**

South Fork Merced River area should be designated "dispersed recreation-no timber harvest."

*Merced Canyon will be designated developed and dispersed recreation. See responses to 361/0861 and 1786.*

**362/1512**

We support the emphasis in the Plan of protecting Merced River and South Fork Merced in the WSR system. We are concerned that the south fork, an important wildlife habitat for Yosemite's deer herd and the part of the main stem viewed by park visitors, be protected. We urge the Forest Service to ask FERC to delay action on the proposed El Portal project.

*Congress has designated the rivers and protection is given to the river in accordance with the Wild and Scenic River Act. See response to 361/1647.*

362/1537

The South Fork Merced should be made part of Yosemite National Park so that Forest Service management activities do not compromise park resources. The area should be given the most restrictive management that major existing developments permit. Mt. Raymond area should be recommended for immediate Wilderness classification.

*The 22 miles of upper South Fork Merced that are within Yosemite National Park will remain under their administrative control. The three miles of South Fork Merced will remain jointly under the control of Yosemite and the Sierra Forest. The lower South Fork Merced, consisting of 18 miles that is within the Forest, will remain under their administrative control. The Mt. Raymond area will remain as a nonwilderness area in accordance with the California Wilderness Act of 1984. See response to 375/1811 and 1056*

362/1682

We recommend South Fork Merced be wild in its entirety without bridges or other constructed features and no OHV routes in the vicinity. An obliteration plan needs to be developed for removal of timber access and other roads, particularly to the west of the river.

*Concerning the scenic or wild classification issues, see response to 362/1390. Depending on the classification assigned, your recommendation to have an obliteration plan is a good idea. You may want to participate in future public meetings concerning the use of this river segment*

362/1700

We disagree with the Forest Service's proposal to classify the lower South Fork Merced River paralleling Hites Cove Trail and Hites Cove jeep trail as scenic. This designation could allow potentially destructive mining projects. We urge the Forest Service to recommend wild designation for the river upstream of the private developments at the south fork confluence.

*Your concerns for W/S classification of South Fork have been expressed by other folks. The Forest will re-examine this issue. See response to 361/1390.*

362/1715

I support protective measures for the land along South Fork Merced which would restrict timber harvesting and road building in the surrounding area, especially on slopes that are visible from the trail that parallels the river.

*Alternative A recommends that South Fork Merced be managed by W/S guidelines after the river is designated. We have changed Management Area 2 from allowing timber harvest on suitable lands to dispersed recreation - no timber harvest.*

362/1791 & 0018

I feel the Forest Service should ask FERC to delay decisions until Congress acts on WSR proposal.

*Congress has acted on South Fork Merced, Merced, Middle Fork Kings, South Fork Kings, and Kings Rivers by designating these wild and scenic rivers. See response to 361/1647.*

## 363-NORTH FORK OF THE SAN JOAQUIN

363/0859

I strongly support WSR status for San Joaquin River.

*Thank you for your support*

**363/0914 & 0018**

I strongly recommend WSR status for North Fork San Joaquin. In particular, it is extremely important that we prevent water and power dams from being built.

*Thank you for your comment. See response to 370/1540, concerning hydroelectric-power dams within wilderness areas.*

**363/0952**

Kings, Merced, South Fork Merced and North Fork San Joaquin need to be protected from proposed intrusions.

*The Kings, Merced and South Fork Merced Rivers are protected from certain management activities within the river corridors. The North Fork San Joaquin will be protected if and when designated Wild and Scenic. See response to 362/1791.*

**363/1315**

I am pleased to hear that you are recommending WSR status for North Fork San Joaquin

*Thank you for your comment See response to 370/1540.*

**363/1533**

In particular, North Fork San Joaquin River has been threatened, and should be strongly supported for inclusion in the W/S system. The conservation alternative concurs with all the comments and recommendation of the Merced Canyon Committee in its official response to the Plan with regard to the river.

*Thank you for your comment.*

**363/1721**

I am pleased with the Forest's WSR recommendations that exclude dams on North Fork San Joaquin. Dams distort water management therefore, I ask your support for the above mentioned wild and free flowing river. There are enough areas being destroyed by OHVs. Livestock grazers are not paying a fair fee.

*See response to 370/1540.*

## **364-MIDDLE FORK OF THE SAN JOAQUIN**

**364/0914**

I strongly recommend W/S status for Middle Fork San Joaquin. In particular, it is extremely important to preclude water and power dams.

*Thank you for your comment.*

**364/0933**

Please grant W/S status for South Fork Merced River, the forks of the San Joaquin River, and Middle Fork Kings River.

*Thank you for your comment. See response to 362/1794.*

**364/1315**

I am pleased to hear that your draft LMP is proposing to recommend W/S status for Middle Fork San Joaquin.

*Thank you for your comment.*

364/1777

I support the Plan's recommendation for W/S designation for Merced, South Fork Merced, North Fork San Joaquin, upper San Joaquin, and Middle Fork Kings Rivers. The most threatened segments of these rivers should be given the most emphasis and priority. These are the South Fork and main stem Merced River below the Yosemite boundary and all the North Fork San Joaquin.

*See response to 360/1647.*

### 365-SOUTH FORK OF THE SAN JOAQUIN

365/0984

I support recommendations for W/S status for South Fork San Joaquin

*Thank you for your support.*

365/1285

Concerning the San Joaquin River Watershed at South Fork, I would like to see the Forest eliminate the OHV corridor that presently exists between Courtright Reservoir and Kaiser Pass Road.

*The Preferred Alternative will retain the OHV corridor from Courtright Reservoir to Kaiser Pass Road, because the 1984 California Wilderness Act excluded a 600 ft corridor due to an established use by OHV users.*

### 366-MIDDLE FORK OF THE KINGS

366/0218

I hope you will give W/S status for portions of the Kings River

*The Middle Fork Kings and South Fork Kings have been recommended by Sierra and Sequoia National Forests. By Congressional Act, portions of the Kings, Middle and South Fork Kings have been designated W/S rivers. See response to 360/1647.*

366/0808

I would like to see W/S studies for all appropriate segments of South, Middle, and North Fork San Joaquin and upper San Joaquin, Middle Fork Kings, and South Fork Merced.

*See response to 363/0952.*

366/0913

I support the Plan which recommends W/S status for Middle Fork Kings.

*Thank you for your comment. See response to 362/1791.*

366/0933

Please grant W/S status for South Fork Merced River, the forks of San Joaquin River, and Middle Fork Kings River.

*Congress has the authority to designate wild and scenic river areas, the Forest recommends. The Forest has recommended these rivers. See response to 360/1647.*

**366/1315**

I am pleased to hear that your Plan is proposing to recommend W/S status for Middle Fork Kings River.

*Thank you for your comment See response to 362/1794 and 366/1667.*

**366/1667**

We ask that you include Kings River above Rodgers Crossing in your recommendation to Congress for inclusion in the national WSR system.

*The responsibility for recommending this portion of Kings River belongs to Sequoia National Forest. However, the Kings River area has been designated a Special Management Area by a 1987 Congressional Act, along with portions of Kings and South Kings River See response to 360/1230.*

**366/1775**

You should have analyzed the Kings River for W/S status. The upper portion above Garnet Dike CG should have been recommended for wild classification.

*Thank you for this suggestion, but the responsibility for classification and recommendation for South and main Kings River belongs to Sequoia National Forest See response to 360/1230.*

**366/1777**

We support the Plan's recommendation for W/S designation for Merced, South Fork Merced, North Fork San Joaquin, upper San Joaquin, and Middle Fork Kings Rivers. The most threatened segments of these rivers should be given the most emphasis and priority. These are South Fork and main Merced River below Yosemite National Park and all of North Fork San Joaquin.

*See response to 360/1647.*

**366/1809**

I support the Forest's recommendations for W/S protection but would also like to have Kings River above the confluence with North Fork Kings included in the W/S status.

*Thank you for your support. See response to 360/1775 and 1230*

## 367-MAIN FORK OF THE KINGS

**367/1282**

W/S designation should also be recommended for the main Kings

*See responses to 360/1230.*

**367/1528**

I am pleased with the step you've taken, including almost the entire mileage of unimpeded rivers within the Forest. Your recommendations for classification is one of the real strengths of the Plan. The Forest Service should have made a recommendation for the main Kings River. Using the excuse that feasibility studies were in progress for a dam at Rogers Crossing as a reason for inaction is a cop-out

*Thank you for suggesting the W/S recommendations as one of the strengths of the Plan. Concerning why the Forest did not complete feasibility studies for the main Kings River, see response to 360/1230 However, since this area has been designated as a Special Management Area by a 1987 Congressional Act, eligibility river studies can now take place and be incorporated within the SMA plan, which is scheduled to be completed in 1991.*

367/1535

The Forest has unique WSR resources, and we congratulate the staff for recommending 225 miles of seven rivers for WSR protection. We support designation to the maximum eligible level for Kings River, and the prevention of unwise dam building in Ansel Adams Wilderness. Times are changing and recreation is becoming more important than energy development

*Thank you for supporting the W/S river recommendations. South Fork, Middle Fork and portions of the main Kings River have been designated a special management area by a 1987 Act of Congress.*

## 370-WILDERNESS AREAS

370/0016

I prefer Alt E as it appears to be the most beneficial to the environment and recreation. I'm strongly in favor of the addition of 14,490 acres of land to the wilderness system in the Kings River area, and the addition of 212 miles of rivers added to the WSR system. I like its effects on the wildlife and their habitat. You should establish a large number of Special Management Areas for both scientific and utilization purposes.

*The President has signed legislation which establishes about 48,668 acres of the Sequoia and Sierra National Forests as the Kings River Special Management Area. The disposition of this area in the DEIS Sec 3 5 3 of the Draft LMP has been resolved. The Preferred Alternative recommended 222 miles of rivers to be added to the W/S river system*

370/0059

The existing wilderness boundary is very poorly drawn in the Rancheria Creek area

*The Rancheria area has 13,330 acres, of which 6,250 acres are now in wilderness by passage of the California Wilderness Act of 1984. The boundaries for these areas were determined by Congress.*

370/0084

I urge you to protect roadless areas, recommend wilderness for some of the 176,000 roadless acres in the Forest, limit clearcutting, and protect wildlife

*The disposition of the roadless areas was resolved by the passage of the California Wilderness Act of 1984. Those areas not designated as wilderness were made available for multiple use and will not require further study until the Plan is revised. The existing semiprimitive non-motorized areas found outside the designated wilderness areas will be protected using the standard and guideline prescriptions for each management area*

370/0096

I saw something about limiting military flights over the national forest every 2 years. What do you mean? The military has helped plenty to harm the habitat and life in our forests. So really get on them.

*Military aircraft are required to fly at elevations of 5,000 feet or more above wilderness areas. Violations of airspace are reported by visitors, but it is almost impossible to trace aircraft to the originating military base. Starting the summer of 1988, a centralized communication system will provide annual notification of airspace restrictions to military bases*

370/0154

When people go to the mountains, they want wilderness, not FM radio.

*Thank you for your comment.*

370/0178

In what ways will you provide moderate increases in the opportunities for public use, enjoyment, and understanding of the wilderness?

*Specific provisions for each wilderness area will be clearly defined within the wilderness plans. Possibilities would include better communication, information and educational media, better management of trail systems to include maintenance and construction, more interpretation and greater frequency of contact with wilderness rangers.*

370/0208

As a concerned Kings River environmentalist, I would like to know the status of the 1.4 million acres between Kings Canyon and Yosemite National Park. Will it be preserved in such a manner as to provide extensive hiking trails which undergo routine maintenance?

*The 1.4 million acres you speak of is the entire Sierra National Forest. It is managed for wilderness and multiple use, and there are about 1,100 miles of trail in the Forest for hiking and horseback riding. The objective is to preserve these trails, which vary in quality from trails developed for intensive use to barely defined routes. Many existing trails need routine maintenance to reduce resource damage or ensure public safety. Of course, this will depend on Congressional appropriations for maintenance, and the assistance of many volunteer groups who want to help meet these objectives.*

370/0210

Improvements to the plan that I would like to offer are: more wilderness areas, especially the Kings River Roadless Area; less land for timber, less land for grazing; and better maintenance of trails.

*The final LMP will address your concern for the Kings River area. Congress has designated this area as a Special Management Area, and the area will be managed according to the Act. Management of the Kings River SMA has many features in common with Wilderness Management. The California Wilderness Act of 1984 has recently added more wilderness to the Forest which should give the Forest an acceptable proportion of wilderness and other resource use lands. Timber and grazing are legitimate uses of the Forest. This Plan creates a balance between timber, grazing and other resources*

370/0235

I would like you to consider conserving the west slope of Sierra Nevada between Kings Canyon and Yosemite National Park.

*The area between Kings Canyon and Yosemite National Parks is the Sierra National Forest. We are attempting to conserve and use it by development of this LMP which provides management direction for the Forest.*

370/0298

I question the criterion the Forest Service used to assess the need for Wilderness. DEIS implies that the value of wilderness is based on the number of people who seek recreation. That is a narrow view for the Forest Service to take. While human recreation is one benefit of wilderness, the land has far greater value than for human use. We cannot have too much wilderness if we are to accept the rightful freedoms of other living things besides humans.

*The Forest Service must follow the Wilderness Act of 1964, which states that wilderness "shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness." Human use is important according to this act. However, we will re-examine the wording in the LMP and make changes as necessary.*

370/0304

Wilderness visitors are expected to increase 110% while wilderness acres are to remain constant. This does not sound balanced.

*The existing wilderness acreage is not totally utilized by the current number of visitors. Therefore, the supply of wilderness exceeds the demand*

370/0306

The Plan states we should "Provide moderate increases in opportunities for public use, enjoyment, and understanding of wilderness." I disagree with this action, because it would be invading the animals' environment. The animals don't want us.

*We would like to increase the public's understanding of the wilderness. We feel that by better education and understanding of the wilderness that people will learn to respect the environment where they live. We all share the responsibility to protect the animals' living space. We can achieve this by increasing public awareness of wilderness values.*

370/0416

It appears that restrictive resource use policies, coupled with millions of acres placed in wilderness, have severely handicapped the utilization of our renewable natural resources.

*Restrictive resource land use policies are regulated by Congressional acts. The Forest cannot change this fact. The LMP, through the preferred alternative recommendations, attempts to provide the most optimal mix of land uses to satisfy identified issues and concerns. Other multiple uses, including renewable natural resources, will be considered along with other values for the remainder of the 57% of the Forest land base.*

370/0541

I can't understand why the environmental groups demand more wilderness areas and less productive measures for the Forest

*Environmental groups are free to demand more wilderness and production groups are free to demand less wilderness. Congress has decided that disposition of the wilderness in the Forest has been resolved for this planning period. All areas not designated by the California Wilderness Act of 1984 will be available for multiple uses other than wilderness. The Preferred Alternative will so state.*

370/0548

We currently have 41% wilderness area in the Sierra, and we have Yosemite National Park beyond that. When I hear people advocate taking timber areas out of production to give animals (spotted owls) more living area, I have to wonder who is fooling who.

*It is true that the Forest currently has about 41% within the wilderness system and that other resources like spotted owls might remove additional lands from timber production. The LMP, through the Preferred Alternative recommendations, attempts to provide the most optimal and compatible mix of land uses that satisfy identified issues and concerns like the spotted owl. This will always involve compromise. NEPA requires an environmental analysis which includes effects on all resources*

370/0626

I feel that parts of our forests should be preserved as wilderness areas, but I also feel that enough land has been set aside for that purpose and that the remainder of the land should be developed for recreation and timber uses

*The final LMP will show no additional lands allocated for future wilderness. The Forest will have about 60% of the land base used for other resource activities. The Plan did indicate the Kings River B5-198 was the only area included in the California Wilderness Act for further planning, however, this area has been designated a Special Management Area by a Congressional Act in 1987 and will be managed accordingly*

**370/0634**

The environmental groups demand more wilderness areas. I think we have more than enough parks and wilderness.

*Congress presently agrees that those areas not designated as wilderness in the California Wilderness Act of 1984 are available for multiple uses other than wilderness.*

**370/0654**

It is very important that no more lands are set aside into areas that can not be used for timber harvesting.

*See response to 370/0634*

**370/0993**

While released under the California Wilderness Act of 1984, these areas contiguous to established wilderness, should receive wilderness consideration rather than just writing off wilderness potential. Contiguous areas on the Forest include areas near Clover Meadow, Portugese Flat, Dinkey Lakes, and Garlic Meadow. I strongly support further wilderness planning for Middle Fork Kings River and contiguous areas.

*The Middle Fork Kings River is completely within the Monarch Wilderness and has been designated a WSR by an Act of Congress. The Garlic Falls area has been designated a Special Management Area by an Act of Congress and will be managed similar to a wilderness area. Thirty thousand acres of the Dinkey Lakes area was added to wilderness in 1984. The area adjacent to Dinkey Lakes, not included in wilderness, has been designated in the Plan as Dispersed Recreation with no scheduled timber harvest. Those areas not designated as wilderness were made available for multiple uses other than wilderness and will not require further study.*

**370/1002**

With more than 40% of your forest already in wilderness, other demands on the forest must now take precedence

*Thank you for your comment. See response to 370/0416*

**370/1055**

Along with trail rehabilitation, there should be a plan that routes trails around meadows rather than through them.

*Trails within wilderness areas that can be routed around meadows is an objective of both the Forest Service, environmental groups and most users of the trails. However, because of heavy trail use, some of the edge routes started to go through the meadows. This heavy use of some wilderness areas has indicated a need for user controls. Limits on group size and length of stay have been implemented. This type of management control along with better trail location should eliminate this problem.*

Exploration for minerals that would not impact resources or necessitate rehabilitation would be the only alternative to consider for wilderness areas.

*Except for mining claims with a valid discovery by December 31, 1984, wilderness areas are withdrawn from mineral entry. However, exploration could be done by nonsurface disturbing means, but no new mining claims could be filed.*

**370/1080**

Unfortunately, wilderness areas often include large stands of merchantable timber that will never be harvested.

*Thank you for your comment. See response to 370/0634.*

370/1142

Kings River Canyon above Rodgers Crossing should be designated as a wilderness area.

*The disposition of this area has been resolved by an act of Congress in 1987. The area is now a Special Management Area and a Wild and Scenic River. See response to 370/0016.*

370/1177

I recommend better access to streams and lakes, and hardening pathways to prominent areas near water's edge. It appears that handicapped individuals have been effectively excluded from wilderness areas due to regulations limiting the use of mechanical vehicles. If the Forest Service can propose a way to facilitate the movement of disabled people to a wilderness area, it would be appreciated.

*There are regulations limiting the use of mechanical vehicles within wilderness areas, which limits handicapped individuals from experiencing these opportunities. The Forest Service does not have the authority to change this policy. However, we agree that disadvantaged, handicapped, and minority persons should have equal access to recreation experience (Plan 4 5 2.1 #3). What we have done at a project level is design facilities that meet these needs around the Edison and Florence Lake areas, which are very close to wilderness.*

370/1266

Why not set marginal land aside for protection from road building and other developments to preserve it for future use if needed.

*Very little, if any forest activities occur on "marginal" land. It is managed exactly as you infer. If, in the future, it becomes practical and environmentally sound to manage, we will re-analyze it.*

370/1282

Both the Plan and DEIS cite overuse of wilderness areas (Plan pg 3-4, DEIS pg. 3-32) and project that demand will exceed capacity during the planning period. (MRVD 1982 220, MRVD 1st decade = 462.8, MRVD 5th decade = 617; DEIS pg 2-50): Wilderness demand will meet or exceed potential capacity of existing wilderness areas prior to the end of the planning period (Year 2035). Existing wilderness areas in ROS class of "primitive will reach capacity by 2025. Despite this the preferred alt. designates no more Wilderness, and the SPMN ROS category will be reduced under all alternatives. All FPA's and released areas should be designated Wilderness.

*The DEIS and Plan show that projected wilderness demand will meet or exceed potential capacity of existing wilderness areas prior to the end of the planning period in 2035. The forest expects to mitigate this by implementing more user controls, limits on group size, length of stay within wilderness and increasing the PAOT/acre multiplier. User quotas will be established for entry points as necessary.*

370/1319

I can't understand why the environmental groups demand more wilderness areas and less productive measures for the national forests. We have beautiful national parks in California that families may use and enjoy forever. But, only a small percentage of the population will use the national forest for wilderness use.

*Thank you for your comment. See response to 370/1842.*

370/1324

I believe the general public, which far outnumbers those special interests, wants to maintain the Forest in an undeveloped and natural state.

*The 1984 California Wilderness Act, the 1987 Wild and Scenic River Act, and the 1987 Special Management Area Act, indicates that about 49% of the Forest will remain in the natural state.*

370/1492

How can the basic facts of life, such as jobs, income, and taxes as they affect those citizens dependent on the forest, be relegated to secondary level benefits status, while esoteric benefits such as "visual quality in excess of ROS class needs" or "diversity objectives" or "natural and scientific areas" in

excess of the opportunities offered by over 500,000 acres of wilderness, are not only included as nonpriced benefits, but can also have considerable negative effects on the potential net value of the priced outputs

*Congress feels that wilderness areas which have been set aside for these values are as important as jobs and taxes. The Forest Service is charged with the administration of wilderness within the Forest. The 527,938 acres of wilderness are for the people. See response to 370/0298.*

We are seeing discrimination in the recreation management of the public lands through the designation of wilderness areas. These areas are primarily useful to the young, vigorous, and affluent. It is difficult or impossible to use for many of the elderly, infirmed or disabled, and the ordinary working man and his family

*See responses to 370/1842 and 1177.*

#### **370/1520**

There should be no additional recommendations for wilderness. Reduction of CAS inventoried lands and the resultant reduction in planned harvest levels until projected increases in growth are actually realized.

*Logging and road building in designated wilderness is prohibited. Unroaded areas are available for harvest only after a complete interdisciplinary analysis (NEPA) which includes public involvement.*

#### **370/1528**

I challenge your statement that limited use of large areas is due to a lack of interesting features. It isn't lack of beauty, but lack of trails that limit use in wilderness.

*You are right, there is beauty in all wilderness areas and because of the lack of trails in some of these areas, use is limited. The wording, "there are large portions of wilderness which lack these attractive qualities and receive little or no recreation use," may be changed. This wording will be based on the fact that the Forest rates these lands as either distinctive, common, or minimal as related to the State of California's overall landscape variety class values.*

#### **370/1535**

As for all amenities resources, the management direction for wilderness is brief, sketchy and superficial. The Plan/DEIS does a very vague job of projecting and analyzing wilderness demand. It also equates wilderness demand with direct wilderness use, ignoring completely the vicarious and indirect enjoyment of wilderness. We strongly recommend the entire Kings River Further Planning Area for wilderness. We recommend the Plan be changed to protect all "released" roadless areas so that in the future they can be considered for wilderness.

*The disposition of the Kings River area was resolved in 1987 by an Act of Congress, designating this area as a Special Management Area. It will be managed similar to a wilderness. We agree the management S&Gs for wilderness is brief. However, the discussion in the DEIS is similar to the other resource use areas. Many of your specific concerns will be addressed when specific management and project level analysis plans are completed for the areas, as mandated by Congress.*

#### **370/1540**

We recommend supporting the WSR designation for Merced River and its south fork. We concur also with your own recommendation that a power project be disallowed at the Hemlock Crossing of North Fork San Joaquin and shall urge representatives in Congress to support this position.

*The California Wilderness Act of 1984, provided language which would allow potential hydroelectric development in this segment. However, the Forest recommended a "wild" designation. This would preclude any further hydroelectric development. If, however, Congress selects a designation other than "wild", then hydroelectric development could be permitted after an environmental analysis has been completed.*

**370/1541**

I support wilderness protection for the Kings River Canyon, Merced Canyon area, Mt. Raymond, and Dinkey Creek roadless areas.

*See responses to 375/0989, 360/1658 and 1647.*

**370/1581**

It is interesting to note that the Forest has designated some areas as wilderness that are "least popular." This is a vague description and needs explanation, since these facts are relevant in consideration by reviewers as to how much roadless, primitive recreation, and wilderness is appropriate in the Forest

*Our definition of "least popular" areas are those that are rarely visited because of limited access*

We are very concerned that the Forest is intending to violate the California Wilderness Act of 1984 by proposing extensive roadless, primitive, administrative quasiwilderness and buffer zones adjacent to classified Wilderness Analysis Areas 46, 52 and 66, which stand out on the Alternative A map as distinct buffer zones

*The Forest has no intention of violating the California Wilderness Act. The Preferred Alternative will recommend Analysis Areas 3 and 18 be used for low intensity recreation, wildlife, grazing, and watershed uses. Analysis Area 46 is now developed recreation, while Analysis Areas 48, 52 and 66 are dispersed recreation with no scheduled timber harvest*

**370/1619 & 1658**

We're opposed to any further wilderness increases such as the Kings River Further Planning Area. More attention should be directed towards existing wilderness than adopting new wilderness areas.

*The Preferred Alternative is recommending no more lands be set aside for wilderness. Those areas not designated as wilderness in the California Wilderness Act of 1984 are available for multiple uses. The Kings River Further Planning Area was designated as a Special Management Area by Congress in 1987. It will be managed similar to wilderness.*

**370/1620**

I believe the primary emphasis should be placed on improvement of public use trails. Forests left in their natural state, streams and rivers left alone, and access roads, automobiles, and other mechanical devices kept to the minimum. The Forest Service will have to be the protectors of the forest and not business managers. Long term interests of the American public are more important than the short-term, profit-oriented plans that have been proposed.

*It is difficult to leave a forest in a "natural state." The Preferred Alternative will, however, designate about 600,000 acres that will be preserved in some form of primitive or semiprimitive land status. Most of the nonwilderness areas will also have natural state appearance, as compared to urban appearances. See response to 370/1055.*

**370/1640**

I endorse mass transit of the public to these areas. Mass transit would increase visitation of the Forest, reduce air pollution from cars, and generate additional revenue.

*Mass transit within wilderness would be contrary to the Wilderness Act of September 3, 1964. Access systems within the wilderness system will be shown on the recreation element (travel plans) within the LMP. A mass transit system, however, up to wilderness areas may be considered.*

**370/1654**

Potential wilderness study areas should not be denigrated by the construction of logging needs until a final determination is made.

*The potential wilderness areas for the Forest have all been designated by the passage of the California Wilderness Act of 1984. Those areas not designated as wilderness were made available for multiple uses other than wilderness and will not require further study.*

**370/1669**

I recommend a new S&G. Establish a phone reservation system for areas with quotas. This would improve management of these and surrounding areas.

*This is a good idea. The Plan will be implemented and kept moving through short term plans, such as project work plans. Since user quotas have recently been established for wilderness entry points, your suggestion would seem appropriate. A decision will be made concerning this suggestion at the project or field level.*

**370/1684**

I oppose any hydroelectric development in any wilderness

*The Preferred Alternative will achieve the results you recommend.*

**370/1690**

I would like to see the areas east of Garlic Spur and Converse Mountain be wilderness, since there is so little in the Forest

*The Garlic Spur and Converse Mountain areas are within the Kings River Special Management Area recently established by Congress. This area will be managed similarly to a wilderness area. The Forest now has about 41% of its lands allocated to wilderness, including this special management area.*

**370/1703**

I object to excessive withdrawals of lands for specific single uses. About 41% of the Forest is already preserved in designated Wilderness. Must we also set aside more of the remaining CAS lands for other single or restricted uses?

*The Forest has no single use lands. It is true that about 41% of the Forest is designated wilderness, but these lands are used for recreation, wildlife, watershed, and grazing. Those areas not designated as wilderness have been made available for multiple uses other than wilderness.*

**370/1706**

There is too much take, take, take, and develop and not enough conserve, protect, and maintain for present and future generations.

*Thank you for your comment. Your concern is one reason we are planning to conserve, protect, maintain, and manage our national resources for future generations.*

**370/1797**

We request that the 4WD way to Spanish Lake be re-opened. There is no discussion of this situation in the Plan, but we believe the government owes us a little. We talk about increasing hiking trails and opportunities, but 4WD activities are not discussed. We recommend an alternative 4WD way from Spanish Lake Trail down Rodgers Ridge to Black Rock Station.

*Your suggestion that 4WD routes that have been excluded from the wilderness areas should be brought together with 4WD routes throughout the remainder of the forest is being considered in the Preferred Alternative. The Plan suggests moderate increases in road and trail construction to facilitate opportunities for dispersed use. It also suggests designations of additional OHV routes in the area where cross-country travel was previously allowed. A future project plan will indicate where these designated trail opportunities will be. OHV travel will be restricted to these designated routes or areas.*

**370/1804**

I support leaving the Devils Gulch roadless area alone. I believe that most of it would make a very significant wilderness to compliment the South Fork Merced wild river designation.

*The disposition of the Devils Gulch roadless area has been resolved with the California Wilderness Act of 1984. It has not been designated a wilderness area but it will be managed as dispersed recreation - no timber harvest. This should complement the South Fork of the Merced Wild River designation as you suggest.*

**370/1811**

The Devils Gulch, Dinkey Lakes, Ferguson Ridge, Mt. Raymond, Rancheria, San Joaquin B, Shuteye and Sycamore Spring Roadless should be designated primitive high country areas.

*The disposition of the Devils Gulch, Mt. Raymond, Shuteye, and Sycamore Spring roadless areas, were resolved with the California Wilderness Act of 1984. These areas have been "released" to multiple use management by that Act. In the Preferred Alternative, Devils Gulch (Management Area 2), Dinkey Lakes (Analysis Areas 48, 62, and 66) and Mt. Raymond (Management Area 11) are now all Management Area 11 Dispersed Recreation, with no regulated timber harvest allowed except for catastrophic events. The former San Joaquin B roadless area is now part of Ansel Adams Wilderness. A portion of Rancheria roadless area (Analysis Area 62) went into Wilderness and the remainder (Analysis Area 61) went into General Forest. Sycamore Springs was "released" and became part of Management Area 4 and 5.*

**370/1812**

I think your agency's proposal of zero wilderness acreage for the roadless areas in this Forest is grossly inadequate.

*As a result of the California Wilderness Act of 1984, the Forest will manage approximately 600,000 acres in some form of primitive or semiprimitive land status. About 49% of the approximate 1.4 million acres will be devoted to roadless wilderness type areas*

**370/1817**

The controversy about roadless areas did not disappear with the passage of the California Wilderness Act. A full range of Alternative for these areas, including full protection, can and should be considered. I believe that all the existing roadless areas, should remain roadless. The projected demand for the P and SPNM ROS classes far exceeds the supply.

*A range of alternatives was considered for the roadless areas released by the California Wilderness Act of 1984. Roads for timber access will be allowed, but will be closed after logging to retain semiprimitive conditions in Analysis Areas 21, 23 and 58. It is true that dispersed recreational use capacities are in short supply in the SPNM and will not meet the projected demand at the end of the planning period.*

In wilderness areas, small groups should be the rule, and horse travel should be discouraged.

*It is desirable to have small groups within the wilderness. The Preferred Alternative will recommend continuing our policy of reducing heavy levels of wilderness visitor use by requiring some controls and limits on group size and length of stay. The use of horse travel is acceptable within wilderness areas, however, many of the equestrians are unaware of regulations in wilderness areas. Often they are a source of major conflict with backpackers along trails, around campsites, and in small meadows. Better communication with equestrians would eliminate some of these conflicts.*

**370/1819**

The passage of the California Wilderness Act has been ignored by the Forest, because the Act eliminates a significant amount of suitable timber land. The Forest no longer has the luxury of trading away the remaining suitable land for nontimber uses. In fact, the Wilderness Act boundaries and the release language were designed to exclude thousands of acres from restrictive management. The Forest has devoted much of the released land area to dispersed nonmotorized recreation. Only 190,790 acres are managed for full timber yield, less than 20% of the forested land.

*By law the Forest cannot ignore the California Wilderness Act. The 59% of lands within the Forest that have not been designated wilderness, were made available for multiple uses, other than wilderness. Lands outside the wilderness system that have been determined to be capable, available, and suitable for timber management reasons will be used accordingly.*

370/1830

We have a large percent of the forest locked up I know, I grew up there. I romped around the lakes, across the plateaus, hiked around to the other side and came home on Road 395, and rode down San Joaquin River in an inner-tube That's the way it should be, and it still can be. The town is there because we made the lakes

*A large percentage of the Forest is not "locked up." However, we suggest that 100% the Forest will have overview management prescriptions which will indicate what should be done to the resources now and in the future. Then every ten years, we will turn the key and re-examine to see what revisions are necessary and then make changes to the LMP, if they are needed*

We're going to lock up the Forest a little at a time, not make a park out of it, or let the cows graze there or even mine it I guess we don't need minerals anymore. Where are we going to work? Where will we take our families camping? Where will we get the wood to make our homes?

*Areas not designated wilderness were made available for multiple uses other than wilderness and can be used accordingly. About 51% of lands outside wilderness will have prescriptions which will allow the Forest to manage the resources according to the preferred alternative. See response to 1830.*

370/1834

I have grown up in these mountains and I have observed the Wilderness areas, which, as a conservationist, I see as becoming a total disaster. It contributes to soil erosion (loss of top soil, which cannot be replaced) and destroys clean water by filling the streams with silt and other foreign matter

*Thank you for your comment.*

370/1839

In recent years the loudest and most demanding response has come from only a small part of the general public, the single issue groups or activists. These groups have successfully influenced the Forest Service's decision making. Through well-financed lobbying efforts, these environmentalists have locked away nearly 43% of this forest's multiple use land area.

*It is true that the Forest now has a large land base allocated to wilderness and special management areas. However, these Congressional Acts have been influenced by the people of the United States for these wilderness and special management areas. The Forest Service's authority is limited to managing, planning, operating, and maintaining areas that have been designated by Congress.*

370/1840

A lot of people like the wilderness. I wouldn't be so much against wilderness areas if they were for everyone. If you want to set it aside, do it, but don't let a few people use it and deny others. If you're going to set aside, set it aside and not let anyone use it I bet that wouldn't last very long.

*See response to 370/1842*

370/1842

Tell me, how does Wilderness area benefit any of us? What good does it do to close the land off so that nobody can use it?

*Wilderness areas have been accepted by the American public as necessary areas to be preserved for our generation and generations to come. We are receiving heavy levels of wilderness visitor use. Some areas even require use controls. Benefits seem to go to about 7% of our population who use the areas. NEPA requires us to analyze all resources including wilderness areas.*

We can't sit by and let them close our Forest lands off to us. We have supported that land for years. We ought to have the right to use it. It doesn't matter if it's for driving or camping. I don't care if you want to spend an hour, a day, or two weeks in the forest. You have that right.

*You surely have the right to use all 1,308,600 acres of Forest-administered lands. Society has determined, however, that controls are necessary in urban areas and with rural, forested areas. The Preferred Alternative provides a management program reflecting a mix of activities, allows use and protection of forest resources, and fulfills legislative requirements. The conditions to use your federal forest lands are spelled out in these guidelines and laws.*

370/1847

It was wise to create wilderness areas to preserve some of what is left of a pristine creation

*The Preferred Alternative is suggesting that about 600,000 acres be preserved in some form of primitive or semiprimitive land status with management prescriptions to back this up. This is about 49% of the Forest.*

### 373-ANSEL ADAMS

373/1667

Any diversion dam at Hemlock Crossing, deep within the Ansel Adams Wilderness, should not be allowed. No such precedent, violating our wilderness systems must occur.

*Under the California Wilderness Act, a potential hydroelectric development project could be completed near Hemlock Crossing on North Fork San Joaquin River. This is a congressional act which the Forest has no authority to change. However, wild and scenic river designation takes precedence over the California Wilderness Act if Congress designates that segment as "wild" thus precluding any hydroelectric development. The Forest has recommended a "wild" designation for this segment in the Preferred Alternative.*

### 374-DINKEY LAKES

374/1804

I am pleased that the fringe of the Dinkey Lakes Wilderness has been recommended for dispersed recreation management without timber harvest.

*Thank you for your comment. The Preferred Alternative has been modified to dispersed recreation with no scheduled harvest.*

374/1812, 1786, 1381 & 1667

There needs to be a substantial increase in the proposed wilderness in the Kings River Planning Area and all the "released" roadless areas, including Dinkey Lakes.

*The Forest will make no additional recommendations for wilderness classification in the final LMP. The disposition of the Kings River has been resolved by an act of Congress, designating this area as a Special Management Area. See response to 370/1535 and 370/1492.*

## 375-RELEASED ROADLESS AREAS

375/0283

Your plan for managing nonwilderness areas is very poor. These are a priceless scenic resource and are extremely important for Forest wildlife. Many areas provide a necessary buffer zone for designated wildlife areas. Place all the "released" areas in the semiprimitive, nonmotorized category. Include Devils Gulch, Dinkey Lakes, Ferguson Ridge, Mt. Raymond, Rancheria, San Joaquin B, Shuteye and Sycamore Spring.

*See response to 375/0989.*

375/0989

I feel strongly that the Forest Plan should have recommended wilderness status for the Dinkey Creek, San Joaquin B, and Rancheria roadless areas. Each has its own unique beauty which is not necessarily well represented in already designated wilderness areas.

*The disposition of the Devils Gulch, Mt. Raymond, Shuteye, and Sycamore Spring roadless areas, were resolved with the California Wilderness Act of 1984. These areas have been "released" to multiple use management by that Act. However, in the Preferred Alternative, Devils Gulch (Management Area 2), Dinkey Lakes (Analysis Areas 48, 52 and 66) and Mt. Raymond (Management Area 11) are now all Management Area 11 Dispersed Recreation with no regulated timber harvest allowed except for catastrophic events. The former San Joaquin B roadless area is now part of Ansel Adams Wilderness. A portion of Rancheria roadless area (Analysis Area 62) went into Wilderness and the remainder (Analysis Area 61) went into General Forest. Sycamore Springs was "released" and became part of Management Area 4 and 5.*

375/1056

I recommend Mt. Raymond be considered as wilderness.

*The preferred alternative will show the Mt. Raymond area as Dispersed Recreation - no scheduled timber harvest. The South Fork Merced has been designated as a wild and scenic river by Congressional act and will apply to 1/4 mile on the Forest side of the river through the Mt. Raymond area. While this designation isn't legislated wilderness, management will be quite similar.*

375/1371

I would like to see wilderness status for the Kings River and Mt. Raymond Roadless Areas.

*See responses to 374/1812 & 375/1056*

375/1461

Please protect our wilderness areas from extensive logging.

*Timber harvesting is not allowed within wilderness areas. Wilderness vegetation will be managed in a more natural condition through the use of prescribed or natural fires.*

375/1498

Our support is for the protection of the wilderness and WSR status.

*Thank you for your support.*

375/1533

In the Ferguson Ridge and Devils Gulch released areas, we support the management prescriptions of Alternative D, except for the exclusion of the Devils Peak botanical area, which should be included.

*In the Preferred Alternative Ferguson Ridge and Devils Gulch are now in Management Area 11 which emphasizes semiprimitive recreation opportunities and no timber harvesting. The South Fork of the Merced River, which flows through the Devils Gulch area has been designated a wild and scenic river by Congressional Act, and will manage 1/4 mile on each side of the river accordingly.*

For the remaining released areas, including San Joaquin B., Shuteye, Dinkey Lakes, Sycamore Springs, and Rancheria, we support the recommendations of Alternative D in all cases.

*See response to 375/0989.*

**375/1538 & 1667**

Please maintain all released roadless areas in a manner that will insure that their wilderness characteristics will stay for possible future wilderness designations.

*The Preferred Alternative will indicate that the management of the released roadless areas will be determined on a case-by-case basis using the interdisciplinary process which includes public involvement. See response 375/0989.*

**375/1581**

Mt. Raymond should not be zoned as roadless, primitive, or "no-timber harvest" prescription, since by the Forest's own admission, there is a tremendous surplus of little-used roadless, primitive land and by contrast, there is a growing demand for timber and dispersed recreation.

*Analysis Area 18 (Mt. Raymond) management prescription will be primitive and semiprimitive recreation use. We do not have a surplus of little-used roadless areas. On the contrary, we estimate our dispersed capacity will not keep up with the demand within the Forest's ROS semiprimitive nonmotorized areas*

**375/1682**

We believe that Appendix H, appropriately indicates the disposition of the released areas. We request that both the further planning area in the Forest and the released areas be analyzed in site-specific detail in terms of the consequences to the environment of nonwilderness management. We request that these LPNF comments along with our comments on Tahoe NF FMP DEIS be incorporated by reference in the record of Sierra National Forest's FMP DEIS.

*The Kings River Further Planning Area has now been designated a Special Management Area by Congress See response to 370/0016. All management activities planned within these nonwilderness areas are subject to short term plans, such as project work plans and are subject to environmental analysis as required by NEPA. Those areas not designated as wilderness were made available for multiple uses other than wilderness and will not require further study except at this project work plan level*

**375/1715**

Please manage the Mt. Raymond Roadless Area in a way that will preserve it's wilderness values.

*See response to 375/1056*

**375/1732**

We support the Tehipite Chapter of the Sierra Club in its conservation alternative that transfers to the jurisdiction of Yosemite National Park administration of the Mt. Raymond roadless area on its south border.

*Thank you for your comment We have adopted many of the ideas in the Conservation Alternative, however, transfer of Mt. Raymond to the National Park Service is not one of them. However, the area is to be managed as Dispersed Recreation - no scheduled timber harvest which will be similar to National Park management.*

**375/1737**

I applaud your efforts in the Plan to maintain roadless areas. This is important since it keeps these areas eligible for future designation as wilderness.

*Thank you for your support.*

375/1787

Given that Mt Raymond is not likely to be made into a wilderness area or given to Yosemite National Park, I support a "dispersed recreation, no timber harvest" designation. I wish to voice strong opposition to the classification of the Iron and Star Lakes areas as "semiprivate motorized" on the "recreation opportunity" class objectives. Iron Lakes Road is shown incorrectly on the Forest Maps. The entire area should be classified "non-motorized" with the exception of existing 4WD roads.

*The final LMP Preferred Alternative will show the entire Mt. Raymond areas as a wildlife and dispersed recreation emphasis area in a semiprimitive setting. There will be no regulated timber harvesting. South Fork Merced has been given W/S status by an act of Congress. We will re-analyze the Iron and Star Lakes area semiprimitive motorized ROS classification given to those areas.*

375/1811

We appreciate that the Forest considers the management of "released" roadless areas to be an issue that needs to be addressed. This is the first forest plan in the region that has done so.

*Specific guidelines of how forest plans manage the released roadless areas will be shown in the Preferred Alternative*

## 380-WILDLIFE

380/0064

Alternative D is not beneficial due to its inability to protect the water quality, riparian corridors, soil productivity, wildlife, and fish habitat. Hydro projects and the lack of OHV enforcement will increase the impacts on the Forest and are not a benefit.

*Both the National Forest Management Act and National Environmental Policy Act state the need to assess a range of alternatives in the DEIS. Alternative D (Low Budget) reflects a minimum level of management to meet the laws, rules, and regulations which govern the Forest Service, and was not selected for the reasons you listed*

Alternative B reflects the poor effort now in place to enhance fish and wildlife. Chemical pest and vegetation management is not a benefit.

*Alternative B reflects the current level of effort. The other alternatives are evaluated by comparing their levels of fish and wildlife enhancement efforts with the current situation. Regarding your comment on chemical treatment, please refer to the Plan and Supplemental FEIS on vegetation management, which provides a good analysis on the effect of herbicide use.*

380/0090

I feel that protecting breeding areas and areas where animals are under harsh conditions is a great idea.

*Thank you for your support.*

380/0091

I really liked the standard and guideline about protecting the nests and dens of all sensitive species until the young are gone.

*Thank you for your support.*

**380/0101**

You say you are going to protect the nests and dens of young animals. But how are you going to know when the babies are going to fly away? Why not protect the adults too?

*The Plan specifies protection of "...nests and dens of all sensitive species until the young are gone." Forest biologists will monitor the nests and dens and determine when the young, as well as adults have left. Guidelines will also be included in the environmental assessment document for individual projects.*

**380/0109**

I agreed with most sections of the Standard and Guidelines. They all gave me the impression that they were made to help manage the environment and control wildlife population. Sections most confusing were those in Timber. They would not help wildlife and are senseless. Many sections I didn't understand; mostly near #'s 150 and 200. The way I understood them, they would probably harm the wildlife community.

*S&Gs were developed to help manage the Forest and to provide for the needs of several natural resources. The S&Gs for timber were developed to help us manage timber resources in coordination with other resource values and are not intended to harm wildlife resources. S&Gs in the Forest Plan are part of the Preferred Alternative (Alternative A), assessed in the DEIS. It reflects the effort of the Forest to provide a good balance of uses, subject to the needs of the public, while protecting wildlife resources*

**380/0110**

Having a program about animals is a clever thing to do. It helps to teach the general public about different species and their habitats.

*Thank you for your comment*

**380/0118**

I agree with Standard and Guideline 35. We should protect all nests and dens from harm or disturbance. #232 seems very reasonable because if there are too many people in a dispersed area, it could be harmful to the forests. I disagree with #2, because I don't think the year 2010 will be soon enough to rehabilitate trails. Many harmful things could happen before that date.

*Thank you for your support. See response to 190/0137 regarding trail construction.*

**380/0127**

I feel it is very important to give some emphasis to animals have plans that protect nests and dens of sensitive animals, provide some owl spots, and also protect Bald Eagle areas I feel you have given emphasis to more than animals. For instance, it's easier for some handicapped and disabled people to go on trails. Putting up visitor stations in the parks, is another example.

*Thank you for your support.*

**380/0142**

I am in total agreement with minimizing management activity in deer population centers during July. But, I think it would be even better if it was year round. I think that our modern ways have intruded too much in wildlife areas already Letting some insects and disease run their natural course unless unacceptable loss will occur, is OK But, if trees are diseased by organisms, we should help them by spraying chemicals

*The intent of establishing deer population centers is to reduce impacts to deer during the fawning season. The month of July is the peak fawning period during which forage and cover conditions are optimum for fawn production and survival.*

*Currently, use of herbicides is restricted within the Region, and is limited to selected progeny and provenance test sites.*

380/0164

I agree with Standard and Guideline #32, except that the improvements stated need to be made more than "slightly".

*We agree and have deleted the word "slightly" from the S&G.*

380/0288

Alternatives H-MKT & C-RPA protect fish, wildlife habitat, and provide for quality wildlife, while increasing water availability and increasing forage is most beneficial to all concerned including the ecological groups.

*The Forest selected Alternative A as the Preferred Alternative for the reasons you listed. It provides the best mix of resource needs for all forest users*

380/0387

We are unable to endorse your preferred alternative because of specific wildlife regulations such as 6x12 ft seedling spacing in deer population areas and 200 ft riparian zones on either side of Cow and Portuguese Creeks seems excessive. The former would require early pre-commercial thinning to maintain tree vigor, while the latter appears to go far beyond that necessary for protection of fish species

*This was one of many compromises each resource had to make during the planning process. The 6x12 ft. spacing is only in the deer holding areas designated in the Draft Plan S&G 54. This spacing allows shrubs and herbaceous forage to develop for wildlife use. The 200 foot riparian zone on Portuguese and Cow Creek is for protection of Lahontan cutthroat trout, a threatened fish species.*

380/0420

My concern is wildlife and their habitats. A thorough study should be done to ensure their protection

*Refer to Appendix B of the Plan for a list of research needs Also, Chapter 5 of the Plan lists all wildlife monitoring which the Forest will implement as funds become available, after Plan approval.*

380/0464

Plan maps for wildlife do not show location of Spotted owl or Goshawk territories on the Forest nor do they show potential peregrine falcon nesting sites. We hope this information will be included in the final plan maps.

*Regional direction mandates that disclosure of the location of Peregrine falcon nest sites to the general public would place the chicks in greater jeopardy from falconry or sale for profit. At this time, there is no inventory of Goshawk territories, however, there is an established matrix of Spotted owl Habitat Areas (SOHAs) which we are currently surveying for verification of nesting activity. Further information is available for review in the Forest Supervisor's Office.*

380/0652

The wildlife surely can adopt to this change due to the fact that the forests will not be made into barren deserts.

*Various species of wildlife need a variety of habitat. The Preferred Alternative provides this variety.*

380/1125

I am in favor of your wildlife proposal, but I question getting too worried about the Oakhurst deer herd. We quit using the Hugh Ryan Canyon area for cattle grazing as the Fish and Game thought this would be a good wintering spot for deer. What has been done on this?

*The current Term Grazing Permit has been amended to reflect changes agreed to between the Forest Service and the grazing permittee, whereby the area west of Highway 41 would not be grazed, but be reserved for wildlife needs*

**380/1143**

As you know, the Forest is home for many birds and other animals. They need our protection as much as we need the beauty of nature. I support the Conservation Alternative.

*Thank you for your comment. The Conservation Alternative was considered and many of its features included in the Preferred Alternative.*

**380/1178**

Any development plans MUST include provisions that will insure that fish-wildlife habitat and sensitive plant resources will be maintained at pre-project levels. The construction of water retention ponds for use by cattle and wildlife should be an annual goal of the plan.

*Please refer to S&G 36 and 64 in the Draft Plan. Both should answer your questions.*

**380/1242**

I feel that many wild animals, birds and insects that are not considered rare animals have few persons to speak up for their natural inherent rights to exist and prosper in the forest lands.

*See response to 380/1282*

**380/1282**

There is no Wildlife Alternative; in fact, all alternatives plan for the decline of wildlife species. The Forest Service seems to know little and care less about the species it should be protecting. Habitat of sensitive species is declining and will continue to decline under all alternatives, systematically planning for the decimation of wildlife. Rational wildlife planning cannot take place without an adequate information base. Wildlife and habitat inventories should be given highest priority, and trapping should be banned throughout the Forest.

*The Forest employs both wildlife and fisheries biologists who are responsible for collecting wildlife information and making recommendations on various projects to enhance and protect wildlife habitat. Habitat for certain species, such as the Goshawk and Spotted owl, will decline; however, sufficient habitat will be managed to maintain viability of all species as required by the National Forest Management Act of 1976.*

*Your comment regarding trapping is under the jurisdiction of the California Dept. of Fish & Game, and is outside the scope of the Plan.*

**380/1362**

The Alternative A theme summary greatly understates the impacts of your alternative on forest wildlife. How can wildlife habitats "be maintained near current levels" given the impacts clearly described in the rest of your alternative description. To state that wildlife will remain near current levels in spite of the impacts is a clear deception of the large segment of interested public that simply does not have the time or expertise to wade through your exceptionally complex documents.

*We agree with your correction for Alternative A regarding the statement that wildlife habitats will "be maintained near current levels". The Forest is projecting some loss of wildlife habitat, particularly for the Spotted owl and Goshawk, depicted in Table 2.05. However, viable population levels will be maintained for all species, which is mandated by the National Forest Management Act of 1976. A change in the text for Alternative A will be made.*

The description of the environment to be created greatly underplays the impact. You state that timberland oaks, snags and down logs will only "decline slightly" or "undergo small reductions." Oaks, snags, and down logs will, in fact, be removed over tens of thousands of acres of forestland under the proposed clear-cut and fuelwood use philosophy. The partial retention of these key wildlife habitats on unharvested forestlands will do nothing to reduce the wildlife losses accruing on the many harvested clearcuts.

*Please refer to the S&Gs in the Plan which pertain to the listed special habitat components. As projects are planned, Forest Service Biologists will use these standards to assess and develop appropriate mitigation measures. For example, creation and protection of snags and protection of all mast producing oak have been used to mitigate the loss of these resources.*

Alternative C may in fact meet RPA objectives for timber and range production, but would clearly fail to meet the RPA requirements for mule deer and cavity-nesting bird habitat production, and should therefore be rejected.

*As stated in the DEIS, the Preferred Alternative is A. However, Alternative C properly presents the Forest contribution to meeting the RPA targets.*

How did the Forest arrive at the idea of creating a new Stage 4C+ and then renaming it "old growth forest?" What happened to Stage 4B and 4C during habitat analysis? This departure from terminology used in all recent pertinent wildlife literature as well as by other Sierran forests has confused and compromised your discussion of proposed timber management and its impact on this key wildlife habitat. Consider your entire analysis of old-growth impacts flawed and subject to challenge.

*Current Regional direction specifies the successional stages and defines the terminology, and the stages which the Forest will maintain. Both 4B and 4C are stages which the Forest included in the DEIS and Forest Plan. See Chapter 3 of DEIS for a complete explanation of the diversity standards.*

Type conversions of brush to grass can be very damaging to wildlife habitat if not done in the proper manner. Conversions should be laid out so that at least 50% of the area will be retained in escape and thermal cover in blocks of 40 acres or larger and distributed to benefit wildlife. Openings should be no wider than 10 chains, perimeters designed with irregular edges, and retention areas selected to favor wildlife. A forest biologist (not a range conservationist) should design the layout of treatment and retention areas.

*Brush type conversions will not be conducted during this planning period. While there are 80,000 acres of chaparral lands in the Forest, approximately 25% are suitable to receive some brush manipulation treatments to: 1) break up homogeneous brush fields, 2) reduce heavy fuels build-up, 3) provide early to mid-seral stage wildlife habitat, 4) provide annual grass range forage and 5) provide recreation access. However, before any brush treatment is implemented, an environmental analysis will be completed to determine mitigation of impacts to other resources.*

I could find no assessment of potential impacts to reptiles and amphibians in your DEIS, but I assume one was made since they are vertebrate groups and the Forest is mandated to manage at viable population levels. Please include a synopsis of your assessment in the FEIS.

*A separate analysis was not done on reptiles and amphibians. However, as you stated, the dead & down standard provides habitat for reptiles and amphibians. In addition, riparian standard and guidelines should provide additional habitat for viable populations of these species.*

#### **380/1362 & 1682**

I find no discussion in the DEIS pertaining to specific planning for identified "Management Indicator Species" required by NFMA regulations (Section 219.19).

*"Management Indicator Species" are listed in the FEIS under the term "Species of Special Interest."*

Your Standards and Guidelines for snags and down logs are inadequate. All soft snags must be retained in addition to the requirements of #44a & 44b. These snags must be distributed throughout the harvest areas and not stacked into noncommercial portions of the compartment as indicated by #44h. All snags should be retained in the vicinity of streams and meadows, and should not count towards the required averages. Down logs should not count towards the average retention level as well. An additional standard should be added that provides that woody debris be retained on at least 20% of all timber harvest areas.

*Snags and dead and down logs are important components of the Forest habitat. Please refer to our response 380/1682 for the reasons for our snag retention standards*

#### **380/1495**

The preservation of wildlife habitat and forest ecosystems are necessary for the welfare of our planet. Ecologists warn us about the unprecedented rate of species extinction. Scientists warn us about the devastating ramifications of the greenhouse effect. Preservation of the forest ecosystem

is a necessary measure to avoid such disaster....The way we manage the Forest has global implications.

*Thank you for your comment*

**380/1550**

As an organization with strong wildlife interests, we are particularly concerned with your timber proposals. Habitat is crucial to wildlife and we fear that the preferred alternative allows for timber yields which will result--through clearcutting, road building, etc. in an unacceptable loss of habitat. Many species, for example, the Spotted owl, require old growth forest Will there be sufficient old growth forest left in future years?

*Although the Plan proposes to harvest some late seral stage stands (oldgrowth), there are many areas on the Forest which will be maintained for late seral stage associated species. These areas are: Riparian, 29 Spotted owl Habitat Areas, Wilderness, Research Natural Areas, and Special Interest Areas In addition, 5% of each vegetation type and seral stage, in combination, will be maintained across the planning area.*

**380/1533**

If funding for such mitigation work and improvement projects is not obtained, wildlife and fisheries resources will be more affected than the Plan implies.

*We agree that if funding for mitigation and improvement projects is not obtained that wildlife and fisheries would be more affected than the Plan implies. However, monitoring would show this trend and a plan revision would be required. Either outputs would be reduced, mitigation and improvement projects funded, or both if condition warranted.*

**380/1669**

How, as mentioned in the Plan, will snags managed at densities below current levels preserve primary cavity nesting birds near current densities

*The present distribution of snags on the Forest is uneven. Some timber compartments are below the recommended density, while others have a snag density which exceeds the standard. As the Plan is implemented, snag density will become more even in its distribution. It is anticipated that this change in redistribution of snags will maintain the population of primary cavity nesting birds near current densities.*

I support the program to identify target fish and wildlife species and long term habitat objectives.

*Thank you for your support.*

Rotation ages should be described in terms of average dbh instead of years. We feel there may be a contradiction between the rotation ages and the equally binding guideline 44 pg.4-23 which requires 1.5 snags per acre in the 15-24" class and 0.5 snags per acre in the 25" or greater age class. It is misleading to suggest the snag management guideline will be followed everywhere. We feel the DEIS does not adequately discuss these concerns

*S&G 44 in the Draft Plan states that within each timber planning compartment, "maintain an average of 1.5 trees/acre . " 1.5 snags/acre will not be managed on each acre Special management areas such as Spotted owl Habitat Areas, riparian, geological areas, archaeological areas, will partially provide snags of the required size class. Other areas, such as remote, steep, and rugged forested areas will provide additional snags of the required size class.*

I need some clarification with S&G #72, pg. 4-26 of the Plan

*S&G #72 in the Draft Plan means that other resource values, such as identified wildlife habitat areas, will be considered when administering livestock grazing permits in accord with approved allotment management plans. If conflicts arise, they should be resolved to benefit wildlife habitats.*

Wildlife, fish and deer herd management is based on the 1982 estimate. The final plan should be based on the most recent population estimate.

*The 1982 base year is used for comparison of alternatives. This base year was used on all forests in California for all resources including fish and wildlife.*

The current techniques available for bird specie inventory are at best moderately precise and accurate.. not high.

*The Forest is presently working with the Pacific Southwest Experiment Statton on an avian inventory technique. We will collect baseline information for the first five years after Plan implementation, and compare the changes in population thereafter.*

Which are the Meadow edge species.

*Please refer to the publication, titled, California Wildlife and Their Habitats: Western Sierra Nevada, PSW Gen. Tech Rept. 37. Refer to the special habitat requirements for each species in the species/habitat matrix. Meadow edges are an important area for deer during the fawning period, and nesting by Great Gray owls.*

380/1682

Baseline biological data essential to a valid Forest Plan and to a determination of species status, is lacking. The Forest has not undertaken a Goshawk inventory and the Spotted owl census is incomplete (DEIS pg 3-45). The validity of Forest statements and plans on these species is questionable. You need a complete list of studies, completion dates, costs of studies, literature review of available research and studies underway or completed in other Forests.

*Please refer to Chapter 5 and Appendices A and B in the Forest Plan for a list of monitoring and research needs. Population estimates were based on both field and literature information. We are presently participating in a Regional monitoring program to determine long term trends in the Spotted owl population. While the Goshawk inventory is incomplete, the Forest will be establishing one Goshawk territory per 18 square miles of suitable habitat.*

Existing standing snags are often felled to prevent fire, to produce fuel wood, to reduce safety hazards, or to control undesirable forest insects. Removal of snags for those purposes may produce critical habitat losses for snag-dependent species if corrective measures are not taken. Attached are follow-up questions from an article. Their findings indicate the need for more than two snags per acre.

*S&G has been strengthened to ensure dead trees will not be felled in snag deficient areas.*

*The questions you refer to in the Raphael and White paper, titled, "Use of Snags by Cavity Nesting Birds in the Sierra Nevada", were directed toward the academic community. The Forest Service also maintains its own research branch through the Pacific Southwest Experiment Station. Please refer to Appendix B of the Plan. Research needs number seven and nine may answer some of the questions posed by Raphael and White. Regarding your comment on the need for more than two snags/acre, the Plan refers to maintaining two hard snags/acre for replacement. As stated in Raphael and White's paper they were using potential maximum populations, and agreed with management objectives outlined in Thomas et al. publication, Wildlife Habitat in Managed Forests in the Blue Mountains, which the Forest used as a guide in developing its snag standards.*

We propose a Wildlife/Recreation alternative, on the premise that wildlife and habitat, their mutual health, welfare, and quality, are the primary determinant and standard bearers of the quality of both the Forest and the recreation experience. What is good for wildlife and habitat in their own right, is good for recreation.

*We have tried to show a reasonable range of alternatives in the DEIS. Two of the six alternatives, (A & E) contain an emphasis on recreation and wildlife.*

You need to include statewide figures on illegal deer hunting by counties and the extent of poaching in the Forest

*The listed "needed information" is more appropriate in each of the deer herd management plans. All the information listed is provided by the California Department of Fish and Game. We will continue our close cooperation with the Department in managing wildlife populations.*

380/1684

In my support of wildlife and fish, I tend to lean towards Alternative E, but Alternative A would be my second choice

*Thank you for your comment.*

380/1702

Fish and Wildlife habitat projects could be limited to those funded from timber sale revenues or those needed to maintain threatened and endangered species.

*Annually, several fish and wildlife habitat improvement projects are funded using the funds collected under the Knutson/Vandenburg Act (KV). These projects would also include any project planned to enhance habitat for officially listed threatened or endangered fish and wildlife species. Other sources of funding are provided by the State through cooperative funds and Sikes Act monies appropriated through Congress. Timber harvest in the Preferred Alternative is not limited by wildlife habitat improvement projects financed from funds other than timber revenues or for threatened and endangered species. Preserving some existing habitat does result in a decrease in timber harvest.*

380/1858

An increase in timber harvest is needed over and above that proposed in Alternative A to enhance wildlife diversity. Greater amounts of regeneration cutting, over 5,000 acres per year, will give a greater distribution of age classes.

*Harvest levels are based not only on meeting wildlife diversity goals, but also visual quality objectives and watershed protection.*

## 381-HUNTING

381/0140

My only comment is that you should limit the number of game being killed.

*This comment is outside the scope of the Plan. California Fish and Game Commission sets the seasons and bag limits for game animals*

381/1797

Many of our local members use the Forest for hunting and fishing opportunities and are concerned about this subject. We reason that deer populations are down due to more mountain lions, hoof rot, and blue-tongue diseases and far less from OHV effects in their habitat. We suspect cattle transmit the aforementioned diseases to deer and grazing permittee's livestock should be inspected and diseased livestock controlled.

*It has not been documented that cattle permitted to graze in the Forest transmit hoof rot or blue-tongue to deer. Blue-tongue disease is transmitted by gnats not by cattle. Good livestockmen generally have their cattle herds periodically inspected and treated for infectious diseases which could jeopardize their ranching operations and their livelihood.*

381/1858

An increased timber harvest (more than that which is proposed in the Plan) is needed, because increased timber yields are directly proportional to the amount of cattle and big game habitat available for a stable cattle industry and sportsmen benefit

*Thank you for your comment.*

## 382-FISHING

382/0135

You should not water roads for dust abatement that are near fishery streams. These streams must be protected.

*The Forest Service conducts dust abatement, 1) to reduce visibility safety hazards on back country dirt roads and 2) to retain the fine material component of the road surface. We have identified that greatest risk of potential impact to fisheries occurs at water drafting sites. See Sec. 4.5.2.5 of the Plan for management direction regarding dust abatement and water drafting*

382/0464

The potential impact to fisheries from chaparral treatment, timber harvest and grazing under the preferred alternative is low. This is true only if these activities are properly controlled. Given past experience, this should not be taken for granted

*Management S&Gs, FEIS Sec 2.5.3.2 and in the Final Plan Sec. 4.5, were developed specifically to reduce potential impacts to the various resources on the Forest. These S&Gs, in conjunction with applications of Best Management Practices and appropriate mitigation measures, are expected to prevent or minimize potential impacts to the fisheries resource.*

382/1125

Grizzly Creek is a very good trout stream that need not be inundated with more logging and access roads. General forest classification is not in the best interest of this area.

*Based on our criteria for defining general forest classification, Grizzly Creek drainage has been designated as such. Management standards and guidelines displayed in the EIS and the Plan were developed to reduce potential impacts to the various resources on the Forest from management activities. These S&Gs, in conjunction with applications of Best Management Practices and appropriate mitigation measures, are expected to prevent or minimize potential impacts to the fisheries resource*

382/1178

We feel that sufficient consideration wasn't given to fisheries. The Lahontan Trout protection and overdrafting of streams were covered, but other habitat maintenance or enhancement seems to be left to coordination with other management practices. Fishery habitat enhancement goals should be included in the plan

*See response to 382/0464. In Chapter 4.0 of the Plan you will find a description of our intent to complete annual fishery habitat improvements throughout the forest. Aside from using project management and KV dollars, the Forest actively pursues money from outside funding sources to complete fishery habitat improvements.*

382/1231

The CSPA recommends total mitigation for all fishery resources lost or destroyed by existing hydroelectric projects. Forest Service should require adequate streamflows which will maintain the pre-project fishery (all life-stages) at all times. Forest Service should monitor and enforce minimum

streamflow requirements and report violation of the minimum streamflow requirements to the Federal Energy Regulatory Commission (FERC).

*See Sec. 4.3 8 and 4.5.2.5 of the Plan which describe our fisheries management objectives for hydroelectric power projects. In our 4e comments to the FERC, we specify monitoring and mitigation for each hydroelectric power project proposed on the forest, including release flow monitoring. The Forest Service works in conjunction with the California Department of Fish and Game in reviewing streamflow records provided to us by the project licensee. Violations are reported to the FERC. In cases of non-compliance, it is the FERC's responsibility to enforce the terms of the project license.*

We recommend the existing wild trout stock be maintained and enhanced by the Forest service in all decisions pertaining to the management of watershed on the Forest. This would be reasonable and in the public interest.

*Currently, we have two identified "Wild Trout" stream segments-the upper Kings River and a portion of the South Fork Merced River. These rivers are designated and managed as wild trout fisheries by the California Department of Fish and Game as a tool to provide a specific fishing opportunity to anglers visiting the area. Forest Service management objectives within these watersheds are described in the Plan. See response to 382/0464*

The proposals to establish reservoirs and introduce warm water species at elevations will not only change stream water levels, but also cause biological impacts to riparian systems upstream from the reservoir. Warm water species will invade upstream riparian areas in summer, and decrease the native cold water species diversity

*See response to 382/1520.*

#### **382/1520**

CalTrout is concerned that warm water fishing is being offered as a substitute for loss of cold water fish habitat due to hydroelectric power projects. Proposals to increase fish output by creating warm water reservoirs are not an acceptable substitute for loss of colder water fishery.

*Your concern about loss of coldwater fisheries due to hydroelectric power development is well taken. By the nature of the activity, hydroelectric power projects with storage capacity will cause replacement of a coldwater stream fishery with either a two-story (coldwater/warmwater) reservoir fishery or, a coldwater reservoir fishery due to the inundation of habitat behind the impoundments. The Forest Service does not actively recruit hydroelectric power projects. However, as a multiple-use agency, it is our responsibility to openly coordinate with proponents of hydroelectric power projects to enable them to pursue feasibility investigations and assist in development of viable projects. Coordination with proponent and various federal and state agencies allows for identification of appropriate resource studies, resource protection and management, and mitigation for resources impacted. Although the resulting reservoir fisheries provide a diversified fishing experience and, often, an increased fish output, this effect is a by-product of the project and not a Forest fisheries management goal in and of itself.*

#### **382/1520 & 1716**

The plan should include a discussion of the responsibility mandated by Escondido v. La Jolla. The Plan should identify existing hydroelectric power projects in which adequate instream flows have not been provided, and set forth objectives for correcting past errors. Plan should also indicate a commitment to requiring suitable flows below any new projects.

*The responsibility mandated by Escondido v. La Jolla, more commonly known as the Escondido Decision, granted the Forest Service the ability to submit to the Federal Energy Regulatory Commission specific conditions which FERC is then required to place into the license. The Escondido Decision occurred in 1984 and has been totally incorporated into the Forest Service Hydroelectric Handbook, on which our Appendix N is based. The Forest Plan describes fisheries management objectives for hydroelectric power projects in Sec. 4.3 8 and S&Gs in Sec. 4.5.2.5. On a case-by-case basis, proposed hydroelectric power projects are analyzed in close coordination with the California Department of Fish and Game, and managed to meet our Forest objectives.*

**382/1520 & 1682**

The Plan does not list any trout or other fish species as Management Indicator Species (MIS). We recommend that all trout species be designated as MIS.

*Please see Sec 3.5.5.3 of our FEIS, that describes the fish Species of Special Interest, or MIS as Lahontan cutthroat trout, Paiute cutthroat trout, and rainbow trout. Riverine habitats on the Forest will be monitored using a resident trout. Rainbow trout is listed individually only because of its wide distribution throughout the Forest. The monitoring concept will, however, result in various resident trout species being monitored at the same time*

We are very pleased with the proposed management of the Fishery Resource.

*Thank you for your support.*

**382/1528**

In the Fishery Resource Sec. 3.7 of the Plan, I note that only 30% of high and medium quality stream waters lie outside wilderness. This raises questions about past management practices and generates real concerns about what impact more intense timber harvesting and road building may have on fish habitat quality.

*A rating of high, medium, or low quality for fish habitat should in no way imply that the condition is solely the result of past forest management. Forest streams exhibit a variety of different geomorphological characteristics that basically define what type of fish habitat to expect in an area. Stream channel stability, summer flows, and availability of quality fish habitat components such as pools, riffles, and spawning gravels, all go into developing the rating. Aside from defining the current habitat quality on the forest, the rating system also helps us identify habitat improvement projects for medium or low quality stream segments.*

**382/1669**

We strongly support the Forestwide program to identify target fish, and wildlife species and long-term habitat objectives as detailed in Forest S&G 50.

*Thank you for your supportive comments about our fishery management direction.*

Some effort should be made to describe the scope and goals of the direct habitat improvement program.

*Thank you for pointing out the need for defining our program goals. We have incorporated this information in the Final Plan*

The monitoring program described in the Plan is very good. However, it is lacking in detail. Cutthroat trout: are the critical habitat components based on a model of cutthroat trout habitat requirements or the Regional stream survey forms? Rainbow trout: We recommend some measure of growth or condition as well as animal numbers

*Cutthroat trout habitat monitoring will be conducted utilizing the R-5 stream survey techniques. Important habitat components, as described in the species recovery plan, will be characterized for each of the two streams by a fishery biologist during the first year of monitoring. These attributes will be the focus of subsequent monitoring to determine if changes are occurring to the habitat. We plan to incorporate a measure of growth and condition in our resident trout monitoring program.*

**382/1777**

Our primary concerns, in general, are the possible or probable impacts to water quality, streamflow, aquatic habitat, and resulting fish populations.

*See response to 382/0464, 333/1520 and 0307.*

**383/0165**

I agree with S&G 45. I think providing Spotted owl territories is a good idea. If an owl was hurt, you could release it to this area and be able to keep an eye on it.

*Thank you for your support.*

**383/0166**

I agree that you should provide Spotted owl territories outside of wilderness. I agree with S&G 32 because the species will live in a better environment and it will help the endangered species so they won't die out. I disagree with #11.

*Thank you for your comments*

**383/0454**

I believe that there is enough timberland set aside for the Spotted owl project.

*Thank you for your comment*

**383/0479**

The Forest Service's Plan restricts timber usage by setting aside thousands of acres for the Spotted owl and deferring land for visual concerns. The Spotted owl is adaptable and will continue to survive in harvested land. Adjacent park and wilderness areas provide all the beauty and aesthetic values one could want from forested areas. It makes sense to allow timber industry to meet its goals on land provided for timber management.

*See responses to 383/0545 & 1858.*

**383/0540**

Spotted owl requires old growth (mostly Douglas Fir) as do other wild creatures in the ecological chain. Your plan places too much emphasis on clearcutting or regeneration harvest. The Forest needs an economist to decide when to harvest timber. Timber harvest should provide cash flow to the Government/Forest. Abnormal practice of lumber going to foreign governments is a loss, when our balance of payments is so negative.

*Concerning the owls, see response 383/0545. With regard to clearcutting, see response 311/1034. The Forest Service is required to provide an even flow of timber for a variety of reasons, including community and market stability. By law unprocessed National Forest timber cannot be sold to foreign countries because, 1) balance of payments and 2) helps to stabilize prices (reduce inflation).*

**383/0545 & 1808**

Why isn't the wilderness area of 500,000 acres enough for owls? That is 40% of the forest! Why the additional 15,000 acres for 18 pairs of owls? How can we spend 15 million dollars of the taxpayers' money on research when the money would be better spent for jobs, education, roads and senior citizens?

*The Forest Service is directed by the Endangered Species Act of 1973 to identify sensitive fish, wildlife, plants, and their habitats to prevent them from becoming Federally listed as threatened or endangered. Based on current information on habitat requirements for the Spotted owl, the majority of the land base in Wilderness is unsuitable for owls. Spotted owls are not known to nest above 8,000 feet, while most wilderness areas are above this elevation. We currently have established an approved matrix of Spotted Owl Habitat Areas (SOHAs), which is part of a SOHA Network which extends from the state of Washington to California. SOHAs provide for 1,000 acres of suitable habitat at all times and 650 acres of replacement habitat.*

*This matrix or network will ensure the viability of Spotted owls over a broad area over time. The matrix pattern is intended to allow offspring from one SOHA to disperse to adjacent SOHAs which may be vacant, due to severe mortality factors, thereby assuring a viable network through time.*

*Another reason for the matrix pattern is to reduce loss of suitable habitat from catastrophic changes (ie. fire, insects, and disease).*

*There are three prescriptions for management of SOHAs. These are: no-scheduled harvest, even-aged, and uneven-aged harvest. The no-scheduled timber harvest would not allow timber cutting other than for minor silvicultural treatments to enhance the habitat for Spotted owls. It is anticipated that in most cases, the timber stands in the network SOHAs will be left to naturally rotate through time. Even-age harvest entails a limited amount of clearcut to manage the stand, but the SOHA area is increased to 2,650 acres to permit this strategy. Uneven-age harvest involves selective logging in a SOHA. This strategy changes or enlarges the SOHA area to 2,000 acres. Management plans written for SOHAs after the DEIS recommend the no-scheduled harvest management strategy.*

The first article deals with the Forest's plan to be conservative for 10 years on setting aside forest lands for the Spotted owl. I don't consider 10 years to be conservative! Also stated in this article was that this decision was the will of the people. I have attended almost every open hearing in the area and 98% of the people who spoke at these meetings are against taking more forest lands from the timber industry.

*See above response.*

**383/0585**

I would like to ask what land areas are for the owl? The old growth timber in unloggable areas should be looked at

*The Sierra National Forest has established 29 SOHAs, five of which are in Wilderness. See response to 383/0545.*

**383/1002**

Your discussion of Spotted owls is confusing. Nowhere can we find references to the establishment of a viable population level. You acknowledge an incomplete census, out of an estimated population of 120-130 pairs. Every Alternative projects populations far in excess of those that would result from the establishment of your SOMT's. This raises the question as to the need for SOMT's at all. This becomes all the more valid in view of your past timber harvest practices and the conclusion that without formal recognition of Spotted owl requirements, the population has not been reduced to sensitive levels.

*Viable population level for the Spotted owl is based on the most current research information, and is established by the Regional Office. The 120-130 pairs are based on surveys and literature which were available on the Forest in 1982, and used for comparison purposes among alternatives. Current direction requires the Forest to identify Minimum Management Requirement (MMR's) for the Spotted owl which is 29 pairs for the Sierra National Forest. Spotted owls located on other allocated land outside the established network also add to species viability. The network ensures habitat is well-distributed, throughout the species range on the Forest, for interaction of reproductive pairs.*

Spotted owls have not suffered from the past 134 years of timber management on the Forest. What evidence points to your conclusion that they will start to suffer now?

*See response to 383/0545.*

Plan pg.3-7 calls for 13 territories in the commercial forest zone in contrast to the DEIS which calls for 12 as minimums. What reasons led to your choice of those numbers. What is the viable population for the Forest as a whole? You seem to have a population numbering 7 to 8 times that needed for viability. Given that situation and the past history of management, designation of the Spotted owl as "sensitive" seems unjustified.

*See response to 383/0545 and 383/1002.*

The position taken by some environmentalists that the Forest Service should preserve a margin for error by adopting Spotted owl MMR's that are more stringent than those currently under consideration is completely misguided. On the contrary, the Forest Service should follow the approach described in Deputy Asst. Sec. McCleery's March 8, 1985 decision on the Spotted owl MMR's in the Pacific Northwest Regional Guide--i.e., set the MMR's at a level that *minimizes* the sacrifice of other resources while conducting a targeted program of research and monitoring that will enable the Forest Service to change course if those MMR's prove to be insufficient. Additional research and monitoring is needed.

*See response to 383/0545.*

**383/1018**

I do not believe that cutting back on board feet that can be taken out of the Forest is the answer. I feel that the market plan is the best for all concerned. I know that the Spotted owl thing is not the main issue, but before it gets out of hand, we should take a second look. Any time we allow an endangered owl, fish, or animal of any kind to come before putting food in our children's bellies, it's wrong, and I suggest the Market Plan.

*See response to 383/0545.*

**383/1192**

Increased timber harvest requires; old growth forest set aside for Spotted owl pairs, slight reduction in visual quality along Mammoth Pool and McKinley Grove roads; more intense management in high recreation areas and riparian zones, reduced crown closure in mixed conifer.

*Thank you for your comment. Your input was considered in making land use decisions for the FEIS and Forest Plan.*

**383/1213**

I think we need to protect owls at all costs.

*Thank you for your comment.*

**383/1298**

There are hundreds of acres of forest that can never be logged. It is inaccessible and it would serve well for Spotted owls.

*It is true that there are many acres that can never be logged, but, Spotted owls require certain types of habitat and the hundreds of acres you refer to may not meet these requirements.*

**383/1313**

A recent Spotted owl report by the Natl. Audubon Society suggests that the buffer zones proposed in the plan are inadequate. The Audubon report recommends at least 2,200 acres per owl territory. This information should be reflected in the Standard and Guidelines including reference to where and how mature timber will be set aside and managed in a manner consistent with Spotted owl preservation. An effective or viable population size must be determined for all sensitive species.

*The Forest is presently meeting the Regional standards for maintaining the viability of the Spotted owl populations. The Forest Service is continuing to collect information on the Spotted owl through the Spotted owl Research Development and Application Program which covers the known range of the Spotted owl in Oregon, Washington, and California. Also, see response to 383/0545.*

**383/1520**

A serious concern is the down slope winter movement of Spotted owls which has been recorded to be as much as 4,000 feet. Can the Forest provide protection for connecting habitat into these lower elevations? Spotted owls represent a specific case where more information is needed to determine habitat requirements.

*The Pacific Southwest Research Station is presently studying the Spotted owl on the Forest, and addressing these questions.*

Regional guidelines indicate that buffer zones around Spotted owl nest sites should be 1.5 miles in radius. The Spotted owl report suggests that the buffer zones proposed are inadequate, and recommends at least 2,200 acres. Mature timber alone won't support the pairs.

*See response to 383/0545.*

**383/1533**

The Sierra Plan and EIS hardly address to how the Spotted owl and its habitat are to be maintained. Page 3-45 of the EIS indicates that planners believe 12 spotted owl management territories - or SOMTs - arranged in a matrix, the necessary minimum required in the commercial forest zone. This assumption appears rather pessimistic because, as table 2.01 on page 2-14 of the EIS indicates, a six to 10 percent spotted owl population increase is projected under minimum level management. The Sierra Plan should at least discuss an occurrence. Other forest plans typically do this by addressing the concept of minimum visible population, but nowhere is this done in the Sierra Plan or EIS.

*Viable population level for the Spotted owl is based on the most current research information and is established at the Regional level. The Forest SOHA network has been modified to include five in wilderness and 24 outside of wilderness. Park SOHAs may also be established. The Forest Service is continuing to collect information on the Spotted owl through the Spotted owl Research Development and Application Program.*

For the preparation of the EIS, planners should assure that the planned 20 SOMTs found on the Forest will indeed preserve a minimum viable owl population. The latest scientific methods should be used allowing a margin of error for all unavoidable assumptions. The way in which the final result is obtained should be displayed in Appendix B. Further, OWLHAB table should be redesigned to reflect owl habitat to the best scientific knowledge. Suitability percentages can likely not be attributed to stands younger than 180 years, and only stands 300 years and older should be considered 100 percent suitable. Re-running some of the alternatives will then tell planners whether the owl pair figures in the draft are accurate.

*The strategy selected for managing SOHAs was no scheduled timber harvest, therefore the FORPLAN model was constrained and does not allow timber harvesting in SOHAs.*

**383/1669**

One thousand acres will not be adequate habitat for the owls. Why only 18 territories when the Goshawk has a similar home range size and the forest is willing to provide for sixty pairs.

*A total of 29 SOHAs has been selected for the SOHA network in the Preferred Alternative. See response to 383/1313 & 0545 for an explanation of our current direction regarding Spotted owls. Also, please refer to the narrative on Goshawks on pg. 3-44 in the DEIS.*

**383/1702**

The number of spotted owl management areas on commercial timberlands could be limited to 12-15 areas instead of the 18 in the Proposed Plan.

*The minimum number of spotted owl management areas and their distribution were established in the Regional Planning Guide. The Forest spotted owl management network meets but does not exceed the minimum established by the Region. The Forest currently has established 29 SOHAs, 24 of which are on lands available for timber production.*

**383/1716**

Guidelines indicate that buffer zones around Spotted owl nests should be a 1.5 mile radius. The DEIS mentions the conflicts of managing commercial forest for Spotted owls with respect to timber and deer management objectives. CNPS reminds the Forest of its multiple use mandate and decreases in Spotted owl population proposed in nearly all plan alternatives could contribute to the need for federal listing as Threatened or Endangered.

*See response to 383/0545 for an explanation of our current direction regarding Spotted owls.*

**383/1736**

A thorough scientific study should be conducted on the ecology of Spotted owls in the Forest to determine, if their population size is increasing, stable, or decreasing; if they require old growth forest for survival and reproduction; how large a breeding territory is required for each pair.

*See response to 383/1313. Research is continuing on the Spotted owls through the Forest Service Spotted owl Research, Development and Application Program and inventories of Spotted owl for other Forest Program activities and inventories of Spotted owls related to other Forest programs.*

**383/1817**

All present Spotted owl territories should be retained. Oldgrowth should be preserved.

*See response to 383/0545.*

**383/1828**

We are concerned about several portions of the draft. One major concern is the amount of commercial timberland to be restricted for the Spotted owl. The estimated 1,800 owls in California would seem to indicate to this uneducated person that the little devils are alive and well-somewhere, and that to sacrifice a town or a company or a single job, is, if not unnecessary, at least extremely premature.

*See response to 383/0545.*

**383/1842**

I would like to know how much taxes the Spotted owls pay. They want all this land for them. The Spotted owl isn't even on the endangered species list. If you've got so many in other states, why do we worry about them here?

*See response to 383/0545.*

How does setting aside 2,200 acres for each 550 pairs of owls benefit us? How does it benefit the taxpayer? The government doesn't even do that for senior citizens who paid taxes for years. I mean they're going to do something big for our owls that God made to live in the forest for years.

*See responses to 383/0545*

**383/1858**

Economic evaluation of Spotted owls and visual resources and their cost to the American people are much underestimated and hidden in the verbage of this report.

*An economic analysis is part of the DEIS and Plan, and displays trade-offs of managing all resources. Please turn to the economical trade-offs analysis section, including tables, in the FEIS, Chapter 2. The tables, along with their accompanying narrative, should be of particular interest.*

The fact your forest is adjacent to Yosemite National Park must not be forgotten when allocating land to a single habitat such as the Spotted owl habitat.

*We may coordinate with Yosemite National Park on Spotted owls. However, special distribution and suitability of habitat will need to be considered before Park lands are included into the Forest SOHA network. See response to 383/0545.*

**383/1861**

I think the Park Service, Yosemite and the Wilderness areas should be maintained for the Spotted owl

*See response to 383/1313 & 0545.*

## 384-SENSITIVE SPECIES

384/1313

We recognize that the Forest is aware and concerned with sensitive species issues. However, the dynamic and complex nature of sensitive species and community information can lead to omissions and inconsistencies in the development of plans.

*Thank you for your comment. We will continue to gather information on sensitive species and communities through our Monitoring Plan (Chapter 5 of the Plan) and make appropriate changes through time.*

384/1362

The Forest predicts increasing livestock grazing will proportionally increase potential impacts to flycatcher populations. It makes no effort at reducing potential impacts by development of specific S&Gs that effectively control cattle impacts to willows. Only a dozen or so willow flycatchers have been found on the Sierra. This species must be afforded special habitat protection.

*We are planning several fencing projects in cooperation with the California Dept. of Fish & Game to protect known Willow flycatcher habitat. In addition we have specifically identified Willow flycatcher for long term population monitoring. We also employ professional range conservationists to assist in preventing loss of Willow flycatcher nest sites.*

How much habitat is being provided for maintaining Goshawk territories? At least 123 acres should be provided until such time as the Forest Service has sufficient field data to show that less habitat can maintain viability. Habitat should be maintained for at least 75 pairs with retained habitat located throughout CAS lands,

*Presently 50 acres of suitable habitat is established for each Goshawk nest territory. Research literature on Goshawks indicate differences in habitat utilization, depending on habitat type. As stated in response #384/1520, we have included a survey and additional standards in the final EIS and Plan to protect Goshawk habitat. The maximum density of Goshawks that has been found in California is approximately two township. Based on the total acres of forested lands, we have calculated the maximum number of Goshawk territories which can be supported is about 50 pairs.*

384/1520

Northern Goshawks' proposed 50 acre territories are significantly below that recommended by published documents. Old growth requirement should be a minimum of 150 acres. DEIS states Goshawk inventory has not been completed. Potential impacts to the Goshawk from Forest Service activities cannot be accurately determined. If the Plan is to meet requirements of CFR Section 219.19, an effective or viable population size must be determined for all sensitive species.

*The current direction on managing Goshawks was explained in the DEIS pg. 3-44. A viable population of Goshawks will be managed on the Forest during Plan implementation through several S&Gs which include Spotted owl management areas, riparian zones, and wilderness. Known nest sites will be protected from disturbance. A survey is among our future research needs for the Goshawk. Goshawk nests will be monitored as outline in Chapter 5 of the Plan.*

384/1669

Censusing by recording flycatcher vocalizations is not an accurate monitoring technique. Often, males will stop vocalizing as soon as the nest is built.

*Please refer to Chapter 5 of the Plan for a summary of the monitoring strategy for Willow flycatchers. The intent of monitoring is to gather baseline information for a period of four years and then monitor trends every other year thereafter. We are aware of the reduction in male vocalization after pair bonding. However, we will continue to coordinate with research and modify our monitoring technique using the most current information.*

Omitted from the list of survey requirements were Spotted owl and Willow flycatcher surveys, neither of which are part of the "field counts" for avian species.

*Table 5.01, pg.5-6 of the Draft Plan lists monitoring requirements for Spotted owl and Willow flycatcher.*

**384/1716 & 1313**

The Plan and FEIS mention the Peregrine falcon, Bald eagle, Spotted owl, Willow flycatcher, Goshawk and the Lahontan and Paiute cutthroat trout as sensitive species. California Department of Fish and Game indicates that other rare animal species occur that need special attention: the wolverine, Mount Lyell salamander, Sierra Nevada red fox, Great Gray owl, Prairie falcon, and the Limestone salamander. Sierra should include them on the sensitive species list

*The Sierra Nevada red fox and the Great Gray owl are listed on the Regional Forester's sensitive species list. The other species are not part of the list. However, the Forest will be able to maintain all species listed in your comments by protection of special management areas, such as Spotted owl management areas, riparian areas, wild and scenic river corridors, and wilderness. The Forest will also continue its coordination with the CDFG in the management of these animals.*

<b>385-THREATENED AND ENDANGERED SPECIES</b>
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**385/0089**

Why protect only 6 nest sites for falcons? I think all of their nests should be protected

*Surveys of cliff systems in the Forest conducted in 1980 identified six superior nest sites. Please refer to the narrative on Peregrine falcons in Chapter 3 of the EIS for a detailed explanation of the S&G. See response to 385/1817. The Forest will establish three nesting pair of peregrine falcons which contribute to the Regional recovery goal of 80 pairs for the National Forests of California.*

**385/0095**

I don't see any point in upgrading the number of commercial sites. It doesn't make sense to me that we should increase the amount of recreational developments throughout the Forest, because many animals would be forced out of their natural habitat. I'm glad we are protecting the nest sites of peregrine falcons Ever since I started learning about them, I have grown to love them more and more.

*The proposed expansion of commercial recreational development is around existing lakes, reservoirs, and heavy use areas such as Dinkey Creek. Any new impact to animals is going to be negligible since those developed sites have existed for approximately 30 years. Thank you for your support of the protection of peregrine falcons*

**385/0153**

I think that you should give more attention to endangered species I also think you should provide for more educational opportunities for the younger generation.

*Recovery plans have been written for the Peregrine falcon and Bald eagle, which the Forest Plan addresses. Regional direction emphasizes the need to protect the habitat for endangered species.*

**385/0182**

Why can't the mountain lions and Spotted owls be moved? Also, what are you going to do about the Forest losing its trees to root rot because they aren't being thinned out.

*See response to 383/1313 regarding your question on Spotted owls. Your question pertaining to mountain lions is outside the scope of the Plan. The California Department of Fish and Game is responsible for managing lion populations. Root rot is an incidental and minor problem in the forest.*

**385/0244**

I agree with S&G 48, it is very important that we protect roost trees for Bald eagles at Bass, Shaver, Redinger, and Pine Flat Lakes. Also, my family and I enjoy going to the snow many times each year and think that providing parking and sanitation facilities is a good idea.

*Thank you for your supportive comments.*

**385/0387**

We are unable to endorse your preferred alternative because 200 feet riparian zones of Cow and Portuguese Creeks seems excessive.

*Because Cow and Portuguese Creeks provide habitat for federally listed threatened trout, we feel that the S&Gs described in the FEIS and in the Plan are appropriate. See response to 385/1520.*

**385/0464**

Opportunities for improving conditions for Bald eagles are limited because suitable roost trees near preferred lakes and reservoirs are abundant and foraging habitat is currently good.

*The statement you refer to is a general comment of habitat conditions in reservoirs where Bald eagles have been observed. Constructing roost trees probably will not be needed. However, there are opportunities at Bass Lake to enhance individual roost trees. Also, see response to 385/1669.*

**385/1313**

We are concerned with some inconsistencies regarding instream flows that may be reduced as a result of hydroelectric power projects. Decreases in late season stream levels could seriously impact sensitive species, such as Lahontan cutthroat trout.

*There are currently no proposed hydroelectric power projects, and probably never will be any projects that could influence the habitat of the two identified Lahontan cutthroat trout populations in the Forest. See response to 385/1520.*

**385/1393**

A knowledgeable person should be hired who can identify and study plants and animals.

*Thank you for your comment. The Forest plans to hire a botanist/ecologist in the near future.*

**385/1520**

We are pleased with the direction of the Plan regarding riparian protection and management and streamside management for all reaches of Portuguese and Cow Creeks. We recommend determination of critical and essential habitat for Lahontan cutthroat trout and Paiute cutthroat trout.

*Thank you for your supportive comments. Management strategies for these two fish species have been defined in their associated recovery plans. The Forest does not have plans to pursue a classification of critical or essential habitat for the streams occupied by Lahontan or Paiute cutthroat trout. These federally-listed threatened species are legally and adequately protected by the intent of the Endangered Species Act of 1973, amended 1986. The Forest has developed S&Gs to provide further protection for these species as found in the EIS (Section 2 5.3.2) and in the Plan (Section 4.5 18)*

**385/1669**

No logging activity should be allowed within the protected strips along the portions of Cow and Portuguese Creeks that contain the population of Lahontan cutthroat trout. Similar restrictions should apply to the tributaries above those populations. The small amount of land removed from timber production is a small price to pay for the adequate protection of those fisheries. How will the impacts of livestock grazing be managed on these listed species?

*Our management direction for the Cow Creek and Portuguese Creek drainages is described in Section 2.5.3.2 of the EIS and Section 4.5 18 of the Plan. Because the Lahontan cutthroat trout is a federally-listed threatened species, Section 7 of the Endangered Species Act of 1973 requires extensive coordination with federal and state agencies whenever major construction projects are*

*proposed within the occupied watershed. On a case-by-case basis, management within the 200 foot protection zone would be defined after coordination with other agencies.*

*The Portuguese Creek streamside zone offers little or no forage for cattle and is not expected to experience impacts from livestock use. Some of the more accessible areas of livestock forage in the Cow Creek drainage are currently fenced off to exclude livestock and protect against potential livestock impacts.*

The Forest is willing to provide protection to roost trees and feeding areas for the endangered Bald eagle, yet no money is provided to identify these areas.

*The Forest has long been aware of the Bald eagle roost and feeding areas and have initiated several projects to enhance the use of these areas by Bald eagles around Pine Flat Reservoir. District personnel have long recorded Bald eagle use in other reservoirs. Depending on program priorities, we will enhance the use of other reservoirs by Bald eagles sometime in the future.*

Sixty pairs of Goshawks seems like an extremely ambitious target. How many pairs were in the Forest in 1986?

*No formal survey of Goshawks was conducted in 1986. See response to 384/1520 and 384/1362 for additional information.*

There is no mention made of the protection of nest sites of the Peregrine falcon.

*Please refer to S&Gs in the Final Plan. Since the Peregrine falcon is a federally Endangered Species, they will be protected throughout the life of the Plan.*

You need to create a new S&G that states: all permitted activities will be restricted if Bald eagle wintering activity suggests that nesting may be imminent.

*Bald eagles are federally-listed as endangered, and, therefore are protected under the Endangered Species Act of 1973. In the event a Bald eagle is found nesting within the boundaries of the Forest, we will comply with Section 7 of the Endangered Species Act and the current recovery plan for the Bald eagle.*

A Goshawk nest has been used for several years in the largely vacant Camp Mary-Mac, and as such, expansion should not be allowed.

*The S&G which refers to Camp Mary-Mac has been eliminated in the FEIS and Plan because of the termination of the permit.*

**385/1682**

We need a history of the Condor habitat in the Forest for the Condor recovery plan.

*This comment is outside the scope of this Plan. The Forest does not have historic Condor habitat.*

**385/1716**

CNPS supports the S&Gs that propose additional care in streamside management for all reaches of Portuguese and Cow Creeks where Lahontan cutthroat trout occurs and all Class I, II, and III tributaries. We recommend that proposals be included in the Final Plan for the determination of critical and essential habitat of the Lahontan and Paiute cutthroat trout. We recommend all sensitive species be designated as MIS.

*See response to 385/1520 and 382/1520.*

**385/1817**

Threatened and endangered species habitat should be maximized.

*We are unsure what you meant by the term "maximized." The Endangered Species Act of 1973 requires consultation with the U.S. Fish and Wildlife Service on all federally-listed threatened and endangered species. We are also directed to prevent any species from being listed. We have*

identified several species as sensitive, such as the Spotted owl, Goshawk, sensitive plants, and taken steps to maintain a viable population. See response 385/1520.

## 386-DEER HERD MANAGEMENT

386/0167

I agree that screening the roads in deer habitat areas is a fine idea to protect the animals, and has my approval all the way

*Thank you for your support.*

386/0171

I think you should minimize activity such as logging and vehicular traffic in all deer population centers throughout the year. I also think you should minimize caretaking activities in deer holding areas throughout the year. I think you should keep vehicle traffic at low levels in all deer winter ranges.

*See response to 380/0142.*

386/1002

DEIS, pages v and vi - What caused the deer herd decline in the 1960's?

*Please refer to the narrative on Mule Deer in the FEIS.*

386/1178

Deer fawning areas should be excluded from livestock grazing permits, and key areas should be fenced to retain cover for fawns.

*Cattle grazing seasons are adjusted to allow deer to use mountain meadows during most of the fawning season. Construction of fences for large areas is very costly, and maintenance would fall upon grazing permittees. However, if problems are identified, then adjustments can be made in livestock distribution to minimize the impact. Please see the narrative on Range in the Plan.*

386/1362

A minimum of 15 basal square feet/acre (or crown closure equivalent) must be retained in all harvest areas, with additional amounts provided in key areas. It is critical that retained oaks be distributed throughout harvest areas and not "stacked" into noncommercial portions of compartments. A standard should be provided that will reduce livestock impact to blue oaks and allow their regeneration on forestland.

*Regarding blue oaks and cattle grazing, refer to Long-Term Changes from Different Uses of Foothill Hardwood Ranges, by Duncan, McDougald, Westfall, 1986 (PSW Report: PSW-100), which determined that cattle grazing had no effect on oak reproduction. Although the standard accepted by the ID team decision-making process does not meet all timber management expectations or all the needs for wildlife, both timber and wildlife interests were well represented in all ID team meetings. The standard stated in the decision should maintain acceptable wildlife habitat, yet produce fairly high timber yields. The economics of our ASQ decision was a major public issue and is discussed in a separate section*

386/1581

We can see no justification for the lower mule deer population of 5,300 displayed in the output for Alternative H, compared with PRF, and strongly suggest that this be corrected and explained.

*The deer population figures were based on the level of management and protection given to deer under each alternative (ie. habitat improvement, critical deer area, and level of harvest). Please refer to Appendix B (FEIS) regarding mule deer population differences among alternatives.*

**386/1619**

We would like the Forest Service to work in conjunction with Fish and Game in monitoring the decline in deer herd and the increase in predator populations.

*Please refer to Appendix B for a list of research needs. The Forest continues to work with Fish and Game in monitoring deer herds and lion population.*

**386/1669**

At least some effort should be made to describe the scope and goals of this habitat improvement program. Given the declining situation of deer herds, the Forest Service needs to concern itself with 100% of the population centers and holding areas, not just 75% as stated. This should involve reduced disturbances during the critical fawning times and habitat improvement.

*The figure in the DEIS of 75% reflects the result of the analysis between the alternatives in the FEIS. The DEIS compared alternatives. It assessed the impacts of improving the habitat in 100% of the deer population centers and holding areas (Alternative E) to no improvements (Alternatives F, H, I) Alternative A was selected as the Preferred Alternative because it gave the best mix of resource uses.*

S&G 41 states there is a #39 population center on the map, but there isn't one. Additionally, management activity should be minimized beginning June 15, not July 1.

*Thank you for pointing out the typographical error We will change the number to 29 in the final EIS and Plan. See response to 380/0142 for our response to the second part of your comment.*

The annual reports from Dept. of Fish and Game are questionably moderate in precision/accuracy. Little data exists to form statistical estimates of value on these reports.

*As the Plan is implemented, many of the sampling techniques will be refined, based on greater statistical accuracy.*

Management activity should be minimized until the end of November, for both elevations as evidenced by deer movements in 1986

*Thank you for your comment. We will change the FEIS to read, "management activities will be minimized to the end of November".*

**386/1702**

Deer are adaptable animals that can survive in areas where timber has been harvested. Timber management need not be modified in key deer habitat areas.

*While it is true that deer have some ability to adapt to changes in habitat, harvest limitations, in some key areas, are necessary to increase deer populations. Timber management in such areas would include leaving more down logs and brush, creating more edge and transitional zones. Based on the most current information, these types of management requirements are needed to provide a harvestable population of deer.*

**386/1798**

We are especially interested in the relationship of the Forest's 5 identified mule deer herds to the mountain lion. The Plan does not address this relationship other than to say it needs more study. We consider the lack of a herd management plan to be a serious deficiency of the Forest's efforts to increase the size of these herds We are deeply concerned by the perception that herds would be improved by eliminating the mountain lion. The herds are endangered more by poachers and loss of habitat, than by lion predation.

*We are continuing to coordinate with CDFG Game to update the state's deer herd management plans. Please refer to the Plan for a list of deer herd management plans, which will be revised during this planning period. These plans will only consider habitat needs. Poaching is an ongoing problem which the CDFG handles as part of their normal operations.*

386/1863

You'll never have any deer unless you get rid of the cattle and mountain lions.

*Elimination of grazing is not a valid alternative for increasing the deer population. Mountain lions are managed by the CDFG and outside the authority of the Forest Service.*

### 387-CONFLICTS WITH GRAZING

387/1806

Even wilderness, the area where there should be no substantial impacts, is allowed to suffer. To maintain or enhance wilderness characteristics, hydroelectric development must not be allowed, and mining and grazing must be eliminated. Cattle are out of character in wilderness, and they compete with and exclude wildlife

*Hydroelectric development is not allowed in wilderness unless it was pre-existing before wilderness designation, or part of wilderness legislation. Mining is allowed on valid claims if established before 1984, no new claims are permitted after that date. Elimination of grazing in the wilderness is outside the authority of the Forest Service.*

### 388-HABITAT IMPROVEMENT

388/0091

I think we should give more than "slight" attention to habitat improvement.

*See response to 380/0164*

388/0178

S&G 76 says recover meadows to "fair" condition. What do you consider fair?

*Range analysis measurements of montane meadows entails recording or tallying ground surface and plant species composition. Herbaceous species tallies are recorded as primary, secondary, or low value "invader" species. A good mixture of primary and secondary species is needed to maintain the health and vigor of montane meadows. Arbitrary categories are used to classify range condition usually expressed as either excellent, good, or poor. Range condition evaluates current productivity relative to natural potential capability. Excellent condition refers to herbage production and species composition at, or near, climax. Range condition evaluation methodology aims to detect or record departure from the natural potential or "climax" capability. For an excellent condition rating, primary species must make up 75% of the herbaceous tally, and secondary species must make up no more than 25%. A fair condition would result in less than this: 25% primary species and 25% secondary species in the composition. The number of low value or "invader" species would increase as the ecological condition class decreased from excellent to fair to poor.*

388/1002

DEIS pg 2-42 and 43 reports that there will be 2,800-3,700 acres of direct habitat improvement annually; and, 3,200-4,800 acres of chaparral treated annually, with wildlife and protection receiving the largest benefits. Are the 2,800-3,700 part of the 3,200-4,800, or are they separate acres.

*There is an overlap in acreage figures. The chaparral acreage reflects not only benefits to wildlife, but also to fuels reduction, watershed, protection, and range.*

**388/1231**

Opportunities to increase the number of fishery habitat improvement projects should focus on soil stabilization measures that minimize sediment entry into stream channels. Extensive coordination with other resources, coupled with mitigation measures, should be implemented to achieve at least a moderate level of fishery habitat improvements.

*Soil stabilization and watershed restoration opportunities are identified on a continuous basis, and prioritized through our Watershed Improvement Needs Inventory. These projects are funded by a variety of sources, including timber sale KV dollars and special appropriated funds from Congress. All of the projects are valuable in meeting our goals to maintain and improve fishery habitat, and water quality. Please see Sec. 4.0 of the Forest Plan for a description of our intent to complete annual fishery habitat improvements*

**388/1362**

An important item not discussed under the Environmental Consequence Range section is the relationship of livestock grazing to blue oak regeneration. Cattle have been allowed to degrade blue oak woodland for many years and effectively prevent its regeneration. A mulch retention standard in annual grass, blue oak range of 700-1,000 lbs./acre is recommended.

*See response to 386/1362. Standards for Residual Dry Matter (RDM) for California annual grass rangelands are found in the Range Environmental Analysis Handbook, 2209.21, Chapter 900.*

**388/1418**

A "snags" policy should be initiated, as they provide for wildlife habitat. In addition, a down and dead wood policy should be initiated to allow the wood to remain for wildlife, and soil building.

*See S&Gs in the Final Plan, regarding snag and down log policy.*

**388/1475**

Preservation of our wildlife habitat with proper management would not only enhance, but improve the grazing and lifespan of wildlife. Without proper cutting of the forest, I feel that these benefits would cease.

*Prior to each project, wildlife requirements are taken into consideration before anything is done on the ground.*

**388/1669**

The methods of converting brush to grass should be listed with a projected mix: prescribed burn: 50%, mechanical: 30%, herbicide: 20%

*The method for converting brush to grass is determined on a site-by-site basis, as prescribed by landform, vegetation, soil type, purpose, and need. We currently do not plan to conduct brush type conversion projects*

**388/1702**

A diversity of habitats could be maintained on the Forest, but the quality and quantity of certain habitats (such as oak stands, meadows, and old growth timber sites) could be partially reduced.

*Different levels of diversity was considered and documented in other alternatives.*

## 389-MOUNTAIN LION

**389/1700**

We urge the Forest Service to make a commitment in the Plan, that no lion removal or hunting program will be allowed.

*This comment is outside the scope of the Plan California Department of Fish & Game is responsible for managing the lion population.*

389/1808

We are concerned with the unwarranted protection, without research, of the 130 pairs of Spotted owls. This was done with mountain lions, and proved to be a mistake. In the late '70s, there were reported cases at Bass Lake of lions killing domestic pets. Eastern Madera County ranchers reported their livestock being destroyed because of an abundance of these "endangered" species.

*See responses to 383/1018 & 0545.*

### 390-EDITORIAL COMMENTS

390/1669

Vague descriptors used throughout the text of the Plan (ie. "moderate reductions", "substantially above" etc.), need to be quantified whenever possible, in terms of the units being discussed.

*We attempt to quantify wherever possible. However, we do not have the staff or financial resources available to develop this level of information. Assessment of impacts of activities is usually stated in comparative terms such as high, moderate, low, substantial, significant. We have standards and guidelines as well as monitoring plans to ensure that if any negative effects occur because of using "comparative terms," activities could be modified.*

390/1682

In spite of commendable features (WSR), the DEIS does not fulfill the NFMA intent of Congress with respect to wildlife, habitat, and integration of other resources.

*Our final plan complies with all regulations and goals of NFMA. In the Plan, resources are balanced, so that people, as well as animals and their environment benefit.*

It's been ten years since the passage of NFMA (1976), and only a minimal number of studies have been done. This is forewarning that studies may not appear in the upcoming 5 or 10 year planning period. The near absence of a resource inventory foundation is indicative of a near non-existent plan. Forest plan to expedite data gathering and research program.

*The Forest utilized all of the best available data during the planning process, ie. literature, professional expertise, State Fish and Game and numerous studies which have been carried out by Forest Service research and Universities. We are committed to improving the data base in the next ten years.*

Regarding the Plan, you need to reallocate and rescope the budget from adverse development to research prerequisite to FMP completion.

*Congress assigns and distributes our budget based on outputs and not on how much data we gather. Congress is the only one who could change our program from producing outputs, to gathering data.*

### 391-PLAN

391/0279

The draft Plan you have written is one of the best plans of any National Forest.

*Thank you for your support.*

391/0283

The final Plan should include: an alternative that emphasizes selective cutting, uneven age management, limited use of herbicides; itemized accounting of overall timber production costs, and expected return; documentation of the figures used for dollar value of recreation. Hiking and other

nonintensive forms of recreation are severely undervalued, a reduction in the amount of timber planned for sale, and a consequent improvement in overall Forest management.

*Both the revised Amenity and Preferred Alternatives now contain a significant amount of uneven-aged management. Recently, a new timber sale accounting system TSPIRS was initiated that identifies detailed costs and returns.*

**391/0472**

I believe that a balanced plan which offers industry a chance to operate, and yet maintains wilderness, wildlife, and recreation areas, would be best for everyone.

*The Forest Service agrees with you, we feel that our Preferred Alternative offers the most for all.*

**391/0535**

I have seen my community prosper with a continued increase in employment and have enjoyed the financial and social benefits that long term employment has to offer. I would hate to see my community collapse and have my job and family put in jeopardy, which is what is going to happen if the decline in timber production continues. I can't understand why the environmental groups demand more wilderness areas, and less productive measures for the National Forest.

*See response to 311/0305.*

**391/0865**

My family requests that forest plans be formulated with heavy emphasis on conservation.

*Your comment was considered during the preparation of the Final Plan.*

**391/1002**

Page VII of the Summary observes that "The Forest provides 30% of the lumber manufactured in the San Joaquin Valley." That raises the unanswered question, "Who provides the other 70%?"

*Other stumpage sources can be found in USDA-Forest Service Resource Bulletin-PNW-75.*

We found the general layout and the way the document read to be confusing. To find one answer in several different locations within the documents, adds to the time and complexity of the review process and will inevitably discourage review by all.

*The organization and structure of this document, for consistency and completeness, is largely a function of administrative policies set in Washington, D.C.*

**391/1134**

The plan is heavily biased toward "commodity" output, especially timber. Only the low budget alternative proposes to reduce timber harvest permanently.

*The average harvest for the past twenty-five years has been 133 MMBF. The current condition reflects the harvest in 1982 which was the base year. Thus, the Preferred, Current, Low Budget and Amenity Alternatives all reduce harvests below the average. In addition, a conservation alternative which had a below average ASQ was analyzed in the FEIS.*

**391/1303**

I believe that it is commendable to maintain some free space in the Forest, but a workable compromise that will be beneficial to people as well as nature is needed. All the alternatives display the class system for the forestlands, and therefore show the concern for nature.

*The Preferred Alternative provides the best mix of benefit for both people and environment.*

**391/1383**

Though I am sure that the work is of the highest quality, the point is most difficult to determine because of specialized jargon developed for the forest planning program, and because basic information was not presented, either to describe existing conditions, as a basis to determine rates of change following certain actions, or to assess new conditions resulting from those actions.

*We tried to make the Plan and FEIS as readable as possible. Included in our Appendices was a list of the acronyms and abbreviations that were used. Within the Plan are S&Gs, and monitoring procedures that allow for modification of activities that appear to endanger the Forest's ecological status. The resource staff monitors Forest conditions and collects basic information on the resources of the Forest.*

**391/1412**

Possible budget deficits should be planned to ensure that environmental goals are not pushed aside.

*Because several comments were received on this subject, we developed Appendix P to explain the relationship between the planning and budgeting processes. Please refer to that appendix for the answer to your questions*

**391/1533**

We recognize that many of the unacceptable aspects of this Plan, particularly in the area of timber management, are reflections of a regional and national Forest Service philosophy, and we therefore request that our comments on this Plan be forwarded to those responsible for these directives at the appropriate level.

*Your comments will be discussed with officials at the Regional and National level.*

To cover an adequate range of alternatives, Sierra planners should develop one or more alternatives exploring the possibility of permanently reducing timber harvest.

*An alternative was added to the FEIS to reflect your concern. In addition, the Amenity Alternative was modified to include uneven-aged management for all CAS land with slopes less than 35%. The new alternative (Conservation Alternative) is our attempt to add the input from this letter into an alternative. The results of this analysis can be found in Section 2 of the FEIS. The volume of this alternative was 66 MMBF. The Preferred Alternative also significantly reduces the timber harvest.*

**391/1637**

In matters of national as well as local interest, such as wilderness, wild rivers, Spotted owl habitat, we believe the Plan should consider availability of areas on adjoining national forests and parks. This should help achieve a better balance of resource allocations where important benefits are at stake

*When developing the Plan, various adjoining Parks and Forests were consulted and their input was included in the Plan.*

**391/1669**

We would like to see an additional Forestwide Goal and Objective: "Manage botanical resources to maintain the present diversity of species."

*Thank you for your comment. The appropriate changes have been made.*

The military should be contacted as needed concerning military aircraft; more frequently than every 2 years might be more effective. S&G 383 should be expanded to cover the entire Forest, not just wilderness.

*New procedures and communication channels have been implemented by the Forest Service for aircraft intrusions.*

391/1839

I am very concerned about the outcome of this LMP.

*The Preferred Alternative provides the best mix of benefits for both people, wildlife and the environment.*

**392-DEIS**

392/0298

The drawings in the DEIS are well done and compliment the document.

*Thank you for your support.*

392/1002

Table 2 31 confirms the existence of nearly 190,000 acres of unsuitable forested land, but lists three-fourths of it as "withdrawn." Clarification is needed.

*"Withdrawn Acres" are areas where legislation prohibits timber harvest. On the Sierra, Wilderness designation has withdrawn an estimated 142,400 acres of forested land from timber harvest.*

DEIS, page 2-12 - The discussion of the H20 benchmark correctly identifies the relationship between timber management and water yield.

*The water yield benchmark maximizes the production of water subject to minimum standards and without impairing the productivity of the land. Regardless if regeneration costs are called water costs or timber cost the point of the discussion is that the costs outweigh the benefit. There are no plans to harvest timber solely to maximize water yield.*

DEIS, page 2-13 reports, for the H20 benchmark, a 5-decade average yield of 2.713 MM or 387,000 more than MMR.

*Thank you for pointing out the discrepancy. The FEIS has been corrected.*

DEIS pg 2-50 - Projected outputs are compared to 1980 RPA pools. However, the R-5 Regional Guide, with goals allocated to forests was published in 1984. MMRs and MIRs are established according to procedures set forth in the guide. How do those requirements relate to 1980 goals shown in Table 2.05 and elsewhere? How were those goals established?

*The Resource Planning Act (RPA) goals are based on historical information. They are goals. MMRs are taken from 36 CFR 219.27 and generally represent requirements outside of the authority of the Forest Service. They are needed for consistency of analysis between Forest's MIRs needed to ensure alternatives are minimally acceptable and implementable and to provide consistent treatment of certain requirements that are common to all alternatives. Together, MMRs and MIRs are requirements. All alternatives, including RPA, must meet MMR and MIR requirements in all decades.*

DEIS pages 2-42 and 2-43 - Are the 2,800 - 3,700 acres included in the 3,200 - 4,800, or are they separate acres?

*They are included in the 3,200 - 4,800 acres.*

Draft plan page 6-10 - Table C.05 which deals with age class distribution of suitable lands shows 394,270 acres of suitable lands in the present forest and 393,700 in the future. However, the sum of suitable acres shown in Table C.03 is 373,500 and DEIS table 2 31 allocates 373,500 acres to the suitable category. It is not readily apparent where additional 20,000 acres in Table C.05 came from,

although we suspect it is the "minimum-level" acreage identified in line 7 of DEIS Table 2.31. Clarification is needed.

*You are correct. Roughly 20,000 acres of otherwise suitable and capable land was found not be efficient for timber production*

DEIS page 2-44 - Integrated pest management will be used only on CAS lands. A "low level" of pest management will be used on areas withdrawn or not capable of producing industrial wood. What are your plans for the other 28,000 acres?

*Pest management activities would be limited to periodic extensive survey to detect pest activity.*

DEIS table 2.11, page 2-80; and table 2.24, page 2-141 - The Wilderness use figures for the first and fifth decades in Alternative D do not agree between these two tables. We note, also, that although both Alternatives D and E add Wilderness acres (table 2.23), only D adds use. Why?

*Thank you for pointing out this error. All alternatives start the same because the figure represents existing use.*

In the DEIS, Sec. 1-1 states that, when approved, the Plan will incorporate 18 additional specific plans and be "compatible with" three more. Unless there is a review of individual plans, the review of this plan is incomplete. No reviewer can reasonably be expected to make the connection.

*These plans are documents available to help guide Forest Service staff in managing the Forest. The public may consult these plans, which are available at our headquarters.*

DEIS Table 2.31, page 2-158 - The footnote, "Acres in first decade," raises the question of whether you plan to rearrange the land classification after the first decade. Does the full planning horizon use this, or some other, classification?

*We do not plan to change the land classification. However, when the Plan is updated in ten years, classification could change.*

DEIS, pg. 3-8, Sec. 3.3.2.1 - We disagree with the last sentence of the first paragraph. To say that the proportionate role of natural resources is decreasing as the population of the local area grows is to ignore the full range of resource requirements.

*The wording has been changed from "natural" to "commodity" in the Plan.*

It would be easier to read Table 3.04 if the lines were totaled across.

*DEIS Table 3.04 added columns to represent totals, and corrected all totals on the bottom row.*

DEIS, pg. 3-69 - The last sentence on the page is interesting, in view of your 10 year timber sale program, which projects sales at only 80% of ASQ. If future timber harvest will depend substantially on timber stands created in the next 10 years, then a fall down to 80% of ASQ during the first decade will have serious long-term consequences. The Plan cannot implement the preferred alternative.

*Thank you for pointing this out. We have corrected it in the Final Plan.*

DEIS pg. 3-83 presents five categories of soil which total 1,372,000 acres. Table 2.31 recognizes 1,275,200 acres in the forest, some of which (now much?) is water. Explanation is needed.

*The acreage figures on DEIS page 3-83 were obtained from soil survey maps. Except for the low productive soil category, the acres were rounded to the nearest 100,000 acres. The correct acreage for the Forest is 1,275,200 acres.*

The comparison of "the six years between 1979 and 1984...." with "the most recent five year period...." renders the comparison meaningless. If you are to compare cost to income, it must be for a comparable time period. We returned to the below-cost discussion which said that accumulated cash for the 6 year period, 1979 to 1984 was \$1,115,000. During those years, we found that the harvest

from the Forest totalled 621 MMBF. Receipts, then approximated \$1.79 MBF. That figure is nonsense. Since you report the amount as "accumulated cash," it must not include the capital value of roads in place as the result of timber sale activity.

*The national debate over the issue of below cost timber sales continues. Since the DEIS was issued the Forest has been implementing an accounting system that utilizes "generally accepted accounting principles" approved by the GAO. A 1987 test of the system indicated that the Forest timber program made a financial profit in 1987. In addition, the 1987 program created additional net economic benefits that will accrue in the future as well as beneficial local social-economic effects. As indicated in FEIS Appendix B section 2.6.3, it is currently national policy to provide most Forest outputs at either no charge to consumers or at a charge less than the willingness to pay price. Proposals to increase users fees are currently being debated between the Administration and Congress.*

We would like you to underline a section of the statement found in the DEIS pg. 3-93; "Studies to establish values representing management disturbance are being planned. Until these additional studies are completed, direct assessment of CWE cannot be made."

*In order to be consistent with the way the document has been written, it is not possible to underline the phrase you suggested.*

We do not understand how the DEIS Table 4 03 illustrates the effects described in the text.

*This table ranks alternatives numerically. Each number is found in the table at the end of each alternative description, under Visual Quality index. This index is just a way of displaying the comparison.*

We have trouble understanding the meaning of DEIS Table 4.18, especially as it relates to the text. It appears that the 5 decade totals for soil disturbance are more favorable for Alternative H than A. The table specifically speaks to acres of soil disturbed, and it is not necessarily a display of projected soil productivity impacts.

*As stated in the DEIS, forest soil productivity is altered by soil erosion, disturbance, and compaction. Generally, soil erosion and compaction increase with soil disturbance. Alternative H shows a lower number of acres disturbed by extensive disturbance such as intermediate, shelterwood, and selection harvest, but a considerably higher amount (36,999 acres) of intensive management which includes clearcutting and road construction. These practices generally have a higher impact on the land. Although Alternative H has a lower total number of acres disturbed, effects on soil productivity may be greater due to a higher intensity of disturbance.*

*Table 4.18 was incorporated for a comparison of disturbed land by different activities. While the table does not display projected soil productivity impacts, it does give a good indication of potential impacts to soil productivity. Forest research and monitoring is needed to determine the degree of impacts on soil physical properties, so we can apply research findings as they become available. There is presently an effort by Forest Research Stations in conjunction with the Forest Service to do full scale research in this area.*

Plan pg 4-2 - If we accept the legislative direction in P.L. 96-514 "Produce high yield of timber....," then your Plan is faulty, as this has not been met.

*The Forestwide goals and objectives have been revised to explicitly state the timber objective for this plan.*

Plan pg 4-9 - Real Estate Management Program is geared toward land acquisition. To what extent have you considered disposal of isolated parcels of land to improve management efficiency? Discussions beginning on pg. 2-28 DEIS, seem to limit disposal by exchange of only those situations where it is necessary, ". . . to resolve conflicts in use." Is disposal, by sale, out of the question?

*We have identified lands suitable for disposal, but, we have no sale authority. The objective of our land exchange program is to resolve conflicts in use and enhance management efficiency through consolidation of ownership.*

The DEIS seems to indicate production on modified-yield lands at something less than "...the highest possible level .. ." Which is the level prescribed in the Plan? Clarification is needed.

*Long-term sustained yield on regulation Class II lands (modified-timber yield) is about 70% of the highest possible because of increase the minimum rotation ages. Current harvest is about 68% of the maximum*

DEIS Table 3 11, pg. 3-84 - The meaning of "NC" in the table is not readily apparent

*"NC" means noncommercial. A definition has been added for clarification.*

DEIS page 3-93 - We note with interest that, "Studies to establish values representing management disturbance are being planned. Until these additional studies are completed, direct assessment of CWE cannot be made "

*While values for applying the regional CWE methodolgy are being established, direct assessment for CWE can be represented by using the clearcut acre in the general forest area as a surrogate measure.*

Draft plan page 3-12 - 20-25% of the "lumber manufactured in the San Joaquin Valley" comes from the Sierra National Forest. At 20%, Alternative A represents a total Valley production of 625 MMBF. At 30% it represents 417 MMBF. The difference of 208 MMBF becomes a significant figure to other stumpage sources.

*Stumpage sources can be found in USDA Forest Service Resource Bulletin PNW-75.*

Draft Plan, page 4-2 - If we accept the legislative direction in P. L. 96-514 "Produce high yields of timber...", has not been met in this plan.

*See response above.*

Paragraph #80 - The DEIS statement seems to indicate production on modified-yield lands at something prescribed in the plan. Clarification is needed.

*In this context, "highest possible" implies some reduction in timber yield to accommodate the co-emphasis resource which is also slightly less than its maximum.*

Plan pp. 5-8 and 5-9 indicates that the activity practice called "timber volume sold" will be monitored through the technique of reviewing Annual Program Harvest Statements. At this point, we are confused by terminology. "Harvest" volume, whether programmed or actual, is different from "sold" volume

*Actual offered volume will be monitored. The "Program Harvest Statement" report includes only volume offered for sale*

It is not clear whether the ".. planned target for the monitoring period," is the ASQ (125.9 MMBF shown on page 6-9), the Timber Sale Program Quantity (125.9 MMBF shown on page 6-9), or the volumes shown in the 10-year action plan. If it is either of the first two, then the proposed action plan builds in an "Indication For Action."

*Table C.06 has been revised to implement the Planned ASQ.*

How will the considerable monitoring expense be budgeted and appropriated?

*Monitoring finances will come from a variety of appropriated funds. The monitoring of a particular function will come from funds allocated for that function. Because several comments were received on this subject we developed Appendix P to explain the relationship between planning and budgeting processes. Please refer to that Appendix for additional clarification.*

Appendix Table I.01, page 7-181 indicates that potential growth is 68 cf/ac/yr. The page 7-178 text refers to a differential of 54 cf/ac/yr. Those two presentations appear contradictory. Clarification is needed.

*Thank you for pointing out this discrepancy. The figure on page 7-178 has been corrected.*

Appendix page 7-241 - Uneven-aged Management defines stands with 3 age groups or more. The page 7-231 definition of Even-aged Management defines stands with a single age group. Where do two-aged stands fit?

*They fit under even-aged management.*

Appendix Page 7-241 - Primitive landscapes appear "totally natural." From where? As foreground scenes, or to an observer from within?

*Primitive landscapes appear "totally natural" from the foreground.*

392/1362

DEIS Table 3 09 appears to be incomplete since no silvicultural systems are given to allow comparisons.

*Table 3.09 will be changed to include silvicultural systems*

392/1363

DEIS pg. iv, paragraph 1. Whoever wrote this paragraph was being sloppy in his use of the word "infinite."

*Thank you for pointing this out. We have changed the text.*

392/1533

Planners sometimes claim that potential roaded recreation use will justify the roading of roadless areas. For the Sierra National Forest this claim cannot be made because new roads would not produce more recreation.

*Your statement is generally true for the Forest. However, there may be some new roads that would increase use for a particular area.*

## 393-MAPS

393/0304

The Wildlife element map only shows deer patterns. What about other animals? Keep 4 WD motorized vehicles out of Lake Edison area. No motorized vehicles allowed north of Granite Creek. Keep trail from Granite Creek camp up toward Cora Lake primitive. Keep northeast half of Lake Edison nonmotorized. Why is Kaiser Wilderness considered semiprimitive and not primitive? Views from Wildlife areas should be considered as you look out over adjacent designated areas.

*Working in conjunction with State Fish & Game, we have monitored deer movement for many years, however, the information on other animals was based on a much shorter period of time. We cannot in good faith publish information on other animals when we are not certain that the information is accurate.*

*Edison lake is surrounded by wilderness so that the only 4WD use authorized is on the road that accesses Edison lake and the road to Onion Springs. A portion of the Cattle Timber Sale is planned north of Granite Creek. However, we will try to minimize the impact of the timber sale. Future plans include moving the Granite Creek/Cora Lake trail to the wilderness boundary. Wilderness is primitive not semiprimitive. Views are considered into the wilderness, however, they are not considered if you are looking back from wilderness over the general forest.*

393/1002

DEIS, pg. 2-32 - The four unlabeled maps for five discussions do not add clarity

*The maps have been labeled in the Final EIS.*

393/1804

There is virtually no difference between the map for Alternative A and Alternative I. Since assigning land uses is a major goal of the Plan, maps are extremely important in displaying uses intelligently, and facilitating comparison of alternatives, and need to be redrawn to provide much more detailed information.

*The maps for Alternatives A & I, are different. For example, Management Areas 2, 4, & 5 are different, there is much more ground allowed for timber management in Alternative I than A, and Alternative A has more dispersed recreation and front country than Alternative I.*

## 394-APPENDIX

394/0063

In the Appendices, pg. 7-83, you refer to El Portal as having begun as a mining town. This is false. It began as an Indian winter settlement and became an orchard and garden for James Hennessy. It has always had communal or single ownership. In later years, it was the property of the railroad, and then the NPS.

*Thank you for pointing out our error. Appropriate changes have been made to show the history of El Portal.*

On pg. 7-83 of the Appendices, you state that there has been a recent resurgence of mining. There are no new mines along Merced or South Fork Merced Rivers. The dredge operations on the Merced are recreational, not economical.

*Corrections have been made to show the correct state of mining.*

394/0993 & 1282

It would greatly help the final version of the Plan to have a good bibliography. It is difficult to understand the basis for your management directions when background information is not referenced. A good bibliography would allow all those involved in the planning process to have access to the same information, and perhaps, arrive at your conclusions. For timber concerns it would be helpful to know more about the decision making process. There needs to be more discussion on the impact the Forest Service has on the creation of poor air quality in the mountains. The Plan states that pollution levels sometimes exceed urban levels.

*We will take your suggestion regarding a bibliography into consideration when preparing the FEIS.*

*The timber decision making process is so lengthy it would be too cumbersome to explain in this response. However we would be glad to discuss this information with you.*

*The plan states that "our activities (burning) will be during "burn" days and in coordination with the local APCD." Most often, the poor air quality in the mountains is not generated by Forest Service activity, but in the San Joaquin Valley and is blown up slope to the mountains by ambient winds.*

394/1002

Appendix page 7-230 In the definition of "erodibility," we suggest adding the word "to" after the word "soil" in the first sentence.

*The change has been made.*

In the definition of "Forest Survey Site Class," (Appendix pg. 7-231), you could enhance readability by including the full table on a single page.

*We will include the full table in the Forest Survey Site Class.*

Appendix pg 7-233 - Although the definition of Mean Annual Increment is technically correct, the term is usually used relative to volumes, either board-foot or cubic-foot, rather than diameters. For planning purposes, it is only meaningful when expressed in volumes.

*The appropriate changes will be made in the text.*

**394/1681**

Appendix B - Research Needs. Yes, continued research is essential to maintain the goals you are striving to reach. Appendix E - Wild and Scenic Study. Please preserve it and treasure it as we do.

*Thank you for your comment.*

## 395-MANAGEMENT STANDARDS AND GUIDELINES

**395/0088**

On Standard and Guideline 353, convert 20,800 acres of brush to grass by 2000.

*The conversion process is not a true conversion, but a periodic burning that leads to enhanced grass and browse for a few years. Based on public review, this treatment has been dropped from the Plan and FEIS. Some true conversion, to break up homogeneous brush fields for fire management purpose, will be created on selected major ridgetops along the front country. These projects will be coordinated with and multifinanced by fire management, wildlife management and range management. They will be created and maintained using a combination of mechanical clearing, prescribed fire and if applicable, application herbicide to maintain permanent openings.*

Standard and Guideline #11 is a good idea, but where are we going to get the money?

*Funds for constructing and maintaining road and trails come from Congressional appropriations and user fees.*

Standard and Guideline #255 is a great idea. We need a public day use site in the Willow Creek area. I also like #349. There isn't enough space for recreation. #282 is also a good idea.

*Thank you for your support*

I disapprove of Standard and Guideline 7, because we don't want more stores in our National Forest.

*S&Gs #7 in the Draft Plan refers to recreational service only, not to retail establishments.*

Standard and Guideline 389 is not a good idea Fund raisers help people a lot.

*S&G #389 in the Draft Plan complies with federal laws that we must follow.*

I disagree with Standard and Guideline 380. You shouldn't let the insects live They ruin crops and spread disease

*S&G #380 in the Draft Plan complies with the wilderness philosophy that the Forest must follow.*

Standards and Guidelines #'s 2 and 233 are both being put into effect a little bit too late. #233 should be in effect in 1988.

*Rehabilitation scheduling is related to availability of personnel, budget restrictions, and priority based on use and need. Lead time for budgeting and planning makes this unlikely. Plan will not be in effect until 1989.*

Regarding Standard and Guideline #383, you should contact military bases every month or every time they do it.

*Military aircraft are required to fly at elevations of 5,000 feet or more above wilderness areas. Violations of airspace are reported by visitors, but it is almost impossible to trace aircraft to the originating military base. During the summer of 1988, a centralized communication system will provide annual notification of airspace restrictions to military bases.*

**395/0094**

Here are my comments on the Management Standard and Guidelines: #3, I think is good. #16 - provide playgrounds; #20 - Allow bicycles in park area, #35 - Protect nest, if endangered; #56 - Don't let owners destroy wildlife; #145 - Prevent city growth into forest; #176 - Visitor booths sparsely located; #211 - Increase fire prevention; #233 - Choose parking lots with care; #238 - Limit vehicles because of exhaust; #349 - Unused roads should be shut down and removed.

*Your comments were considered in our analysis.*

**395/0097**

I like Standard and Guideline 14. I think when reviewing #21 people should keep in mind if the animals in the area are being affected. I agree with #305. #35, 367 and 305 should pass. I hope you stop people from shooting animals because maybe someday they will become extinct.

*Your comments were considered in our analysis*

**395/0098**

Good suggestions on #2, 3, 9, 10, 16, 35, 204, 205, 225 and 226 in your manuscript. These were, sensible suggestions for our lakes, campsites, and hiking trails I feel that you made some bad decisions on #7, 21, 32, 87, 203, 206, 207 and 370. These seemed illogical and not very reasonable for our recreation sites and activities.

*Many S&Gs are written in general terms to provide flexibility in planning and administration. The planning process provides checks and balances that provide protection and enhancement of multiple uses of forest resources. Certain resources must be protected as prescribed in federal laws, administrative directives and agreements between various agencies and organizations and the Forest.*

**395/0099**

Standard and Guidelines 14, 21, 366 and 367 - Don't allow OHVs by animal habitats. Help animals that may become extinct. Research on lakes and creeks nearby. No firearms. I don't think #202 and 335 are right, as many animals may be killed. I don't like #21. Animals may need human help. #366 and 367 should proceed. Stop people from hunting or even shooting is not easy, but please try.

*S&Gs #202 and #335 in the Draft Plan are not intended to expand vehicular travel. In fact, these S&Gs can be used to control and protect wildlife.*

**395/0100**

Standard and Guideline #14 is not a good idea. Why would you not allow OHV travel? #21 is a costly and unimportant idea. I like #21a. It is a very good idea. You should not make any OHV allowances in those areas where delicate species can be endangered #22 is helpful. Better swimming areas would be enjoyable #23 is a waste of money that could go to making better

bathrooms at campgrounds. #35 is important as I would hate to see endangered species be hurt needlessly.

*Restrictions are intended to protect habitat and soils as specified in many S&G, including S&G #21 in the Draft Plan S&G #23 in the Draft Plan does not involve any significant funds, but restricts timber cutting in order to provide pleasing landscape views, which in turn enhances the general economic status of the local business services that employ many local residents.*

#### **395/0103**

Standard and Guideline #47: It is great that you are protecting endangered species. #53 is good for the land because seeding prevents erosion. #179 is good for people to understand cultural resources #189 is good to eliminate unsafe transportation in the Forest. #198 - I think you shouldn't increase the number of roads in the forest

*S&G #198 in the Draft PLAN is intended to improve safety, not expand road networks.*

#### **395/0104**

Standard and Guideline #304 - I think your snow vehicle guidelines are good, along with your fisheries standards. #7 was not very good because some commercial businesses may pollute the Forest. Some of the snag guidelines are good because they should be cleaned up, but some still need to be left.

*S&G #7 in the Draft Plan is a general statement. Upgrading services and facilities is not intended to encourage expansion, rather to improve conditions with proper environmental safeguards*

#### **395/0107**

Standard and Guideline #2 - Trail reconstruction needs to be accomplished at an earlier date. #26 - How much freedom would be allowed in the wild? #45 - Is there enough land allowed? #52 - Can't screening be saved in some cases? #69 - Regulating grazing is good. #72 - Your science is wrong. I agree with # 35, 37, 47-49, 56, 77, 101, 107 and 108. #49 is very important to protect the nesting grounds of endangered birds.

*Currently existing trails are being improved. To rebuild trails is to protect resources and increase safety of users. Since our goal is to protect wildlife, S&G #52 in the Draft Plan allows for mitigating measures whenever possible. #72 in the Draft Plan implies that wildlife habitat protection takes precedence over identified conflict from cattle grazing.*

#### **395/0111**

Standard and Guideline #1 - I agree with the recreational development for people to enjoy. #47 - I agree with protecting the Forest's 6 superior nest sites for peregrine falcons I also agree that the bald eagles need a feeding area. #305 - I don't agree with because I don't want to prohibit aqua-planing devices. #35 - Please protect the animals from hunters and traps people might put out.

*Aqua-planing is prohibited for safety reasons These two lakes are used heavily for fishing Hunting and trapping is regulated by the California Department of Fish and Game*

#### **395/0112**

How are you going to provide visitor safety and site protection by 2005? How are you going to improve the water quality? Will little kids be safe when you build foot paths around the lake.

*Measures for safety and protection of visitors are part of the design and planning process. Resources are also protected by the S&Gs used in the planning process, required by federal regulations*

How will you be alerted when a habitat is endangered, when there is degradation of air and water quality, loss of soil or vegetation, adverse impact on recreational uses, or technological changes in OHVs? Why can't screening be protected during management and how often will you have direct habitat improvement?

*Monitoring will alert us to degradation of the environment. Often screening is left along roads to protect wildlife. Numerous habitat improvement projects are completed every year.*

**395/0116**

Why do you want to allow insect, plant and animal infestations to run their natural course? I don't think you should increase sites by about 7% by 2000. This will be dangerous. Why do you want to provide upgrading commercial recreational services and facilities? I also think #23 is a big waste of money.

*Infestations are only allowed to run their course in wilderness. Outside of wilderness, infestations are monitored and suppressed if warranted. There is a significant demand and public support for recreation development and maintenance of visual quality.*

**395/0119**

I don't think you should make more space for the deer. I think you should let people cut down trees for firewood. I am glad that you are going to make new roads with new signs.

*Your comments were considered in our analysis.*

**395/0123**

Standard and Guideline #2 - How will you do that? #6 - What kind of campsites will you build? #208 - When you allow the natural fires to burn, how will you keep them under control? #214 - What kind of intensive law enforcement will you be using?

*Plans for trail rehabilitation and campground construction are developed through an environmental analysis for each project. Strategies for natural fires in the wilderness will be confine, control or suppress depending on the assessment of each fire. Law enforcement will include both prevention and enforcement.*

**395/0124**

Standard and Guideline #7- Why do you want to provide upgrading commercial recreational services and facilities? #23 is a waste of money. I don't think you should let the insects and disease infestations run their natural courses. Why do you want to increase sites about 7% by 2000?

*Limited improvements of recreational facilities is an effective way to maintain the attractiveness of the Forest as visitors increase in number and use of the Forest. Improvements also protect facilities from physical deterioration. Only in wilderness do we let forest insect and disease run their natural courses*

**395/0130**

Why should we provide for commercial upgrading? What good will that do our forests? Cedar snags should not be used for certain activities. My question is, why not? Wildlife section says to provide a certain amount of acreage for owls and I thought it didn't look like enough.

*Research literature and professional observation indicate that primary cavity nesters do not select cedar snags over other conifer snags. The size of Spotted owl territories and habitat has been under study for some time. The issue is discussed in detail in the FEIS. See response to 395/0124 regarding commercial upgrading.*

**395/0131**

I want you to cut down on all roads. You're taking too much land from wildlife. I think you should limit boats to 15 mph, when they are near the shore. Once a year, call the military and ask them not to fly low over wilderness.

*Your comments were considered in our analysis.*

**395/0132**

Rehabilitate trails before 2010. Is proposed increase in developed sites enough? How many new oaks will you plant? Why the increase in oaks? How can you tell changes are taking place, especially in the soil? The law for maximum noise level should be enforced by fines. Add more parking areas sooner. How many do we have now? The camping limit of 10 days is good. Boat limit should be 200.

Boat speed limit should be 20 mph. Why wait until 1990 for most things. Get it done now. Brush to grass before 2020.

*The planning process for the protection of Forest resources is complex, subject to constraints imposed by fiscal, natural, economic and legal factors and by conflicting demands. Recommendations from staff specialists for accomplishing goals are subject to administrative policies, legal statutes, and fiscal constraints. Hence, goals as stated in S&Gs represent the best estimates of staff, with due consideration of public input.*

**395/0133**

A wonderful idea is the closing of some roads during deer and other animal reproductive seasons. If a small natural fire is burning and isn't causing any major damage, you should let it burn and let nature take its course.

*Thank you for your support and input See response to 395/0123*

**395/0139**

Standard and Guidelines 4, 48 and 49, I am in complete agreement with I am glad that you thought them up Another item that I agree with is #107, also #234.

*Thank you for your support.*

**395/0146**

It is a good idea to provide facilities for the disabled in the forest. I like Standard and Guideline #16 - Provide a place for kids to play. Plan should be developed to manage bicycles in mountainous areas. Place greater emphasis on habitat improvements for endangered species. Need maximum firewood gathering because some animals would lose shelter People should be allowed to camp at a place as long as they want. Limit over-snow vehicles Protect fish. All aircraft wreckage should be removed.

*Thank you for your comments. Firewood gathering is limited to designated areas. Management only gives priority to firewood over other forms of debris removal. Limits on camping are tied to projected demand for camping opportunities.*

**395/0147**

I disagree with building new trails. It would mean cutting down trees to make room Upgrading commercial facilities seems wrong. More things to cause pollution. Why don't you fix up present roads first. Then, you might be able to build a new road or two. Encouragement to handicapped is great. Also great, is the preservation of endangered species.

*Your input was considered in our analysis.*

**395/0148**

It's good to protect nests and dens of sensitive species. Also, arranging harvest units and management activities to preserve nest and dens. #48 - Good to protect roost trees and feeding areas for bald eagles. Good to protect from fire also. #220 - Increase camp units. Then, camp areas won't be so crowded and more people can enjoy the outdoors. Lower boat speed limit from 0800 to 2000 from 40 to 35 mph. Some people take advantage of the 40 mph speed limit to race with other boats

*Thank you for your support. Speed limits and other aspects of safety are developed jointly between the Forest and Madera County.*

**395/0150**

Standard and Guideline #21 - How will you know if these changes take place? #53 - Temporary roads: Couldn't these roads be permanent? #74 - Who will pay to keep the stock driveways and travelways in useable condition? #62 - Would 100 feet across from the edge of streams, lakes and reservoirs be enough?

*Changes are observed by trained personnel, such as botanists, soil scientists, and other environmental specialists. Logging roads and other features must be managed in ways that do not lend to habitat deterioration after the logging operations. Range permittees are responsible for maintaining stock travelways in good condition. However, riparian zones of 100 feet are standard until a project is planned for the area. During planning, environmental specialists investigate to determine if more than 100 feet is necessary to protect the riparian zone.*

**395/0151**

Standard and Guideline #11 suggests a moderate increase in road and trail making. I don't think there should be, because there is a sufficient number of trails cleared for tourists already. S&G 71 suggests burning land and replacing most of the land. I feel that burning the land may get out of control

*S&G #11 in the Draft Plan is intended to provide routes to areas that cannot be used as designated, because of inadequate access to the area.*

*S&G #71 in the Draft Plan is an acceptable procedure that is undertaken only with the approval of state and federal agencies that have responsibilities for adequate fire control and wildlife protection.*

**395/0153**

I object to Standard and Guideline #7 because there are too many developed sites in the Forest now. You state that you want to provide more commercial influence in the forest. Why would you want to add to the corruption caused by the influence of commercial companies who are out to make a fast buck! In the fisheries and wildlife section, you say that you're going to focus more attention on cooperation with local landowners so they will understand how they can protect our wildlife. I'm pleasantly surprised with this new and insightful outlook.

*See response to 395/0124.*

**395/0154**

I would like very much to have parking and restrooms at snowplay areas. I really agree with protecting nests and dens of sensitive species. I agree with the Spotted owl Management Areas. I agree with Standard and Guideline #32, emphasizing habitat improvements. I also agree with #47, protecting the Forest's 6 superior nest sites for peregrine falcons.

*Thank you for your support.*

**395/0155**

Your idea of developing a bicycle/foot path around the lake is an agreeable decision to me. Letting disease infestations and insects run their natural course disappoints me. It might be too dangerous. Waiting for the bad effect of disease infestations, and insects to appear, and then taking care of them may be too late and risky

*See response to 395/0116*

**395/0156**

On Standard and Guideline 305, I agree with you on lowering the speed limit to 15 mph because I'm sure that there have been accidents because of the high velocity some boats travel on the water. I agree with you on #35 and #47 because of the same reasons and that is, protecting the habitats of certain kinds of animals

*Thank you for your support.*

**395/0157**

Increase fire prevention, presuppression, fuelbreak systems, and fire safety programs on forest lands. #255 - Construct a public day use site for picnicking, swimming and fishing in the Willow Creek area. Closing unneeded roads is good. #244 - I don't agree with the upgrading of commercial recreational services and facilities. Don't put more roads in the Forest. Manage bicycle use in mountainous areas outside of wilderness.

*Limited expansion of commercial facilities benefit visitors without creating environmental problems. Limited road improvements enhance uses and administration of the Forest within broad goals of public benefits. Other roads are closed for similar reasons. Any use of vehicles, including bicycles, is scrutinized for impact on the Forest and controlled accordingly.*

**395/0158**

I agree with Standards and Guidelines #'s 43, 47 and 48, the protection of deer, peregrine falcons and bald eagles. #51 - Don't build roads in key wildlife areas. #76 - Helping wildlife to do things like that #93 - Improving trees. #145 - Not fair to wildlife living in that area. #147 - A good rule, help to prevent freeloaders. #208 - A good way to control the wilderness. #214 - Just because it's a part doesn't mean it has no law breakers.

*Thank you for your input and support.*

**395/0159**

I agree hardly, that we should continue emphasizing opportunities for equestrian uses. I agree with providing parking and sanitation facilities for snowplay and cross-country ski areas. I agree with planting new trees if the number of trees falls below the number of trees needed to meet the regeneration standard

*Thank you for your support.*

I agree with minimizing all mining activity in the wilderness. I agree with prohibiting additional tables and benches, and maintenance to existing ones. I think this is good, because I don't think that's very important, and I think it will save money for other things. I disagree with increasing the developed sites by 7%.

*Thank you for your input and support. The increase will occur in areas of intensive recreational use (Management Area 1), which occupies less than 7% of the Forest.*

**395/0161**

Standard and Guideline #2 - Improve campgrounds by 2010 I think this should be accomplished sooner. #48 - Protect endangered species' habitat. #50 - It is very important to me, because I think the fish population should be plentiful at all times. #369 - Would prevent people from getting lost.

*Thank you for your comments. Campgrounds and other facilities are scheduled for improvement based on budget priorities.*

**395/0162**

Your ideas for more sanitation facilities is a very good one. They are important to have around all the parking areas If your new water system works out, it sounds wonderful Our water is very important and there are many concerns in the world for it. #35 is very good. Protecting nests and dens will help keep the population up and extinction down.

*Thank you for your support.*

Standard and Guideline #57 is an exceptional idea. I agree completely with #102. I like #113

*Thank you for your support.*

**395/0165**

I like Standard and Guideline #2. If a person was to get hurt on a trail, they might not want to come back. I also like #35. #43 is a good idea.

*Thank you for your support.*

**395/0170**

I agree that you should avoid conversion of prime farmland and forest range to other uses, as is stated in Standard and Guideline 151. If you convert more land like that to other uses, you can lose a lot of good area #179, 180 and 181 are very important. I also agree that increased control of insects and disease should be vital to the Forest Management Plan.

*Thank you for your comments*

**395/0171**

I like Standards and Guidelines 16, 25, 31 and 35

*Thank you for your support.*

**395/0172**

What is the reason for burning part of the Forest? I think we should have fewer trails for vehicles. Why the 15% increase in recreational equipment? Why are vehicles allowed on wilderness? What is "land-disturbing?" Why more ski and snowmobile areas? What is "special permit" use of water streams? Why bicycles? Aren't there enough vehicles permitted? What are fair conditions for the meadows when they are recovering?

*Controlled fires enhance wildlife by promoting early seral stage vegetation. Vehicles are controlled to protect environment and wildlife in wilderness areas. The S&G refers to dispersed recreation, which means that outdoor activities do not involve improved campsites and use of vehicles are limited to existing roads. Disturbed land is rock or soil that has been moved. Existing developed recreational areas will be allowed to develop to capacity before new areas are considered. Special permitted water use refers to water storage facilities. Bicycles are used primarily in developed recreational areas. A fair condition for a meadow is when its composition is 25% primary species, and 25% secondary species.*

**395/0177**

It is a good idea to put in new and better trails for horseback riding, and also for people who like to walk. Improved paved roads also sounds like a good project. One of the best ideas yet, is making it possible for handicapped and minority people to enjoy the park as much as everyone else. Putting in more facilities sounds like a terrific idea for the handicapped.

*Thank you for your support.*

**395/0179**

I believe a few of your plans need improving and need to provide more information pertaining to the main idea, holding more recreational activities. I believe that there are enough, and we should be more protective over the wildlife.

*Most recreational activities take place in developed areas. Further development is generally restricted to these areas.*

**395/0180**

I think fire prevention plan, Standard and Guideline #210 is a great idea. It is a very good way to solve for the fires in the future. I think that we need more camp units. The Plan on pg. 4-39, #220, is the Plan that should solve this problem. On pg. 4-40, #226, I agree with your plan to prohibit floatable aircraft on the lake.

*Thank you for your support.*

**395/0183**

I like the fact that the Forest Service will provide more handicapped facilities in your parks. I feel that this is a very good idea. I also like your idea to decrease grazing of endangered plants in certain areas. I liked your proposal to make road improvements where they are needed. It would be wonderful to drive along a non-bumpy road.

*Thank you for your support.*

I disagree with your proposal to slaughter all sorts of insects in the area of people. There are birds and other animals that feed on these insects. I also disagree with your proposal to limit campground stays. A lot of us aren't RV drivers with pit bulls and yappy dogs. I thought it was unnecessary to keep criminal records, since there aren't many criminals who go to the woods to write on walls.

*No program is planned for eradicating insects unless there is a serious problem. Limiting campground stays allows more families to enjoy the Forest environment.*

**395/0304**

The timber volume sold must be studied and it must be proven that lumber is sold at a total profit, at least breaking even with all costs incurred. Air quality should have annual and seasonal monitoring and reporting periods. There is no money allocated to monitor trails, their conditions and campsite status.

*Thank you for your comment. See response to 040/1369 for information on "below cost" timber sales.*

*During implementation, air quality will be monitored. In the near future we will be monitoring our Class I area to set a base from which we can assess management activities on these areas. There must be money assigned for trail monitoring, which is one of the major uses of this wilderness. We do annual condition inventories on most wilderness trails. Some of the less used trails are inventoried every third year. Wilderness rangers make individual assessments of dispersed campsites on a seasonal basis.*

**395/0464**

Standard and Guideline #375 calls for snow survey sites and cabins to be removed from wilderness areas when snow courses can be correlated with areas outside of wilderness. Since the snow survey information is shared with other resource agencies this rule would impact more than just PG&E. This guideline should be removed. #226 will ban all float aircraft from all lakes and reservoirs in Management Area 1. We suggest it read "Float planes will be permitted for administrative purposes by permittees and only on designated lakes...." DEIS pg. 3-92, the source of water for Balch Camp is Black Rock Reservoir, not Wishon.

*Wilderness policy is to remove snow survey sites and cabins.*

*There are only a few of the larger reservoirs on the Forest that could be used for float planes. Unfortunately for float plane advocates these lakes also have heavy recreation use. They also have excellent access which negates the necessity of float planes. All other lakes would not be considered, because they are in designated wilderness.*

*Thank you for your comments. The change will be made in the text.*

There needs to be a discussion of climate. Plan should address/acknowledge the existence of weather, water and snow data collecting stations, availability of general isopleth maps, and lack of good climate information. The Sierra receives air flow from areas of poor air quality. Ozone and potential acid deposition become increasingly more evident.

*Although the discussion in the plan did not specifically address climate, weather and snow/water collecting stations, these items were considered and are part of the background records.*

**395/1669**

I need you to describe enforcement and control methods that are used.

*Methods are described in the Forest's OHV plan, not in this document.*

We wholeheartedly support the user pay concept for all resource use from range and timber to recreation and wildlife. This should be restricted to major developments.

*Due to increased maintenance costs and diminishing Forest Service budgets, the Forest is shifting to the "user pay" concept. You can expect this to continue in the future.*

### 396-SOCIAL/ECONOMIC/EMOTIONAL/PERSONAL COMMENTS

396/0357

I'm sure just about everyone living in our area enjoys our SNF, but I believe business and recreation can be accomplished.

*Thank you for your response. We feel that timber harvest and recreation can both exist in the Forest.*

396/0614

I am writing to express my feelings about the proposed management plan. I feel that it is unreadable.

*This Plan along with other Forest Plans must meet Regional & National direction established by the Department of Agriculture. We are aware of the problems you speak of and are trying to simplify wherever possible.*

396/1055

We recommend two positions for the Forest. They are Botanist - ecologist who would monitor sensitive plants, riparian zones, and Research Natural Areas. The second is a Range Conservationist who would oversee cattle stocking rates and monitor the effect on forage.

*We agree with your first recommendation, and intend to fill a position of Ecologist/Botanist to administer the sensitive plant program and vegetation management program. The overall Range Management Program is administered by the Forest Resource Officer and his staff. The "on the ground" administration rests with the District Rangers.*

396/1225

The foresight to preserve now will earn the gratitude of future generations who cannot act to protect their interests.

*Thank you for your comments.*

396/1308

I lived in Calaveras County for years and was shocked when I first saw the effect of damming the Stanislaus.

*Hydroelectric projects are precluded on rivers that have W/S designation. Rivers that are not in the W/S system are analyzed on a case-by-case basis through an interdisciplinary analysis with public involvement.*

396/1326

I also urge you to support the Conservation Alternative and designate the Upper Kern River Canyon as wilderness.

*The Conservation Alternative was analyzed and the results can be found in section 2 of the FEIS. As a result of that analysis, many aspects of the Conservation Alternative have been adopted in our Preferred Alternative. The Upper Kern River Canyon is the management responsibility of the Sequoia National Forest.*

396/1558

I am in favor of the plan affecting the entire western slope of the Sierra Nevada between Kings Canyon and Yosemite National Park

*Thank you for your comment.*

396/1804

I think the presentation of management areas and prescriptions in the Plan makes it excessive and unnecessarily difficult to find out what management is applied to what land.

*The illustration for the direction tiering process has been clarified in the FEIS. This method gives the field foresters more flexibility to adjust the prescription on the ground.*

I think this plan needs a lot of revision before you begin managing SNF with it. However, please do not throw out the points that I have praised in the revision.

*Thank you for your comment*

396/1835

Give the sawmills the timber they need to keep everyone going full speed ahead. I don't like restrictions of anything. Let's have the timber at a price that our future children can afford homes that we are enjoying today.

*The Forest is managed on a multiple use/sustained yield strategy. We are trying to perpetuate the Forest for future generations. This is why we must manage the Forest.*

### 397-EDITORIAL CORRECTION ON THE DOCUMENT

397/0060

On pg. 2-177, the discussion near the bottom regarding AMN makes the statement difficult to understand. "Emphasizing amenity values resulted in predicting significantly reduced developed recreational demand which had a negative effect upon PNV." Perhaps the faulty design of the amenities caused the drop in PNV, but emphasis of traditional amenities should result in increased recreation demand.

*Management under the Amenity Alternative emphasizes nonmarket value such as dispersed recreation, wilderness, wildlife and fish habitat. Many developed recreation sites are located in riparian areas which are important for wildlife and fish. If this alternative was selected, it is likely some developed sites would be closed. Few, if any new developments or expansions would be permitted. If a major conflict developed between the amenity value and developed recreation, the amenity value would prevail. It is felt the demand for developed recreation would be met elsewhere.*

397/0464

Kerckhoff Powerhouse has an installed capacity of 193 MW, not 34 MW. First power house for Crane Valley and dam at Bass Lake went into operation in 1896 before the date on pg. 3-106 of DEIS. Figure 3.05, pg 3-109 has a number of inaccuracies. Chilkoot Lake belongs to PG&E. Crane Valley Project should be listed as "project to be relicensed before 1990."

*These changes have been made*

Standard and Guideline #307 on pg. 4-45, proposes closing roads in the Courtright/Wishon Reservoir areas to "general two-wheel traffic upon project completion." We request substituting the term "activity" for "project "

*We agree and have changed it*

Standard and Guideline 256 encouraging licensee to correct erosion problems along Bass Lake shoreline prior to relicensing is no longer relevant. Extensive Erosion Control Plan for Bass Lake has been developed by PG&E in cooperation with the Forest and other resource agencies. Therefore, there is no need for #256.

*The appropriate changes will be made in the text*

**397/0993**

I believe the second paragraph on pg 3-19 of the Plan Sec 3.22 should read: "The potential for acid deposition research has shown that acid rain may be a relatively rare phenomenon in California, while dry acid deposition is a constant process".

*The appropriate changes will be made in the text.*

**397/1002**

Should there be a heading or title for the second column on pg. 2-28 (DEIS)? Standard and Guideline 3 in this discussion needs more detailed review. It seems to propose government control of private development . #10 is troublesome, and #11 needs clarification for the same reason mentioned under #3

*LANDS should be the heading on the second column on pg. 2-28.*

*S&G #3 in the Draft Plan proposes control of unwarranted (unauthorized occupancies) community expansion upon adjacent Forest land. High density development should be encouraged on land less suitable for agricultural purposes. We have changed the wording to clarify the statement.*

*The wording in S&G #10 and #11 of the Draft Plan has been changed to clarify the statements.*

Table 2 29 (DEIS), would be more meaningful if it included subtotals and totals.

*These changes have been made.*

DEIS pg. 4-105. Should the first word in the last sentence of the first paragraph be "though?"

*This typographical error has been corrected*

**397/1213**

Table C 06, Ten Year Timber Sale Action Plan, pg. 6-16: The Basin sale is shown in R.27E, it should be R 22E. (Although I wish it was in R.27E) It would save a lot of problems concerning Nelder Grove

*Thank you for pointing out the error The sale has been modified because of the Spotted owl requirements The revised portion will appear in the ten year sale program.*

Special Management Area, Plan pg. 4-11 within the present Nelder Grove boundary, there are 1,540, not 1,400 acres as stated. Certainly, the whole grove should be considered.

*According to the 1972 Nelder Grove Resource Inventory Report, there are 1,434 acres Our numbers have been changed accordingly. The establishment report will be prepared after the Forest Plan is approved.*

**397/1581**

In Table 2.24, (DEIS 2-143), apparently there are misplaced decimal points for wildlife and fish user days under Alternative H

*Yes, there is a misplaced decimal. Thank you for bringing it to our attention. We have corrected it in the Final document.*

397/1703

Under the preferred alternative, with 125 MMBF per year ASQ, the 10 year timber sale action plan on pp. 6-12 to 6-28 of the Plan shows an intended timber sale program that averages less than 100 MMBF a year, or only 80% of proposed ASQ. This spells doom for the existing North Fork sawmill and its forest-dependent community.

*See response 392/1002.*

397/1811

Throughout the Plan and DEIS, ORVs are incorrectly referred to as "off-highway vehicles" (OHVs). The Forest Service should not change their terminology for off-road vehicles (ORVs), to conform with the State of California. Executive orders, federal laws, and regulations refer to and define ORVs. Since the Forest Service is bound by these laws and regulations they should not confuse the issue by using terms not covered by federal regulations.

*The change from ORV to OHV was a regional decision.*

The disposition of roadless areas was not "resolved" by the passage of the California Wilderness Act of 1984. Public concern remains for de facto wilderness areas "released" by the California Wilderness Act of 1984. The issue of management of these "released" areas remains and was identified as an issue on page 1-7 (DEIS). While the California Wilderness Act of 1984 released eight areas from wilderness consideration in this planning period, Congress did not prohibit the Forest Service from considering any of these areas for wilderness.

*We believe the disposition of the roadless areas was resolved. However, we agree that management of the areas has yet to be determined. We plan to use the Forest Environmental process, which includes an interdisciplinary resource team, and public involvement to determine management of each individual area. Public involvement will be initiated at the beginning of the proposed project.*

The Wilderness Act of 1984 does not require "ensuring some measure of solitude" in a wilderness area. The act requires that a wilderness have "outstanding opportunities for solitude or a primitive and unconfined type of recreation."

*Thank you for bringing this to our attention. We have changed the paragraph you referred to.*

Since the Plumas National Forest did not have any designated wilderness areas until 1984, we would like to know what data from the Plumas was used in determining capacity for the Sierra National Forest.

*In early January of 1984 the Regional Office sent the Forest a paper entitled "Recreation Capacity and Demand Analysis", Plumas National Forest, Nov. 83. It was used as a guide for developing capacity and demand analyses for the Forest.*

397/1817

The statement on pg. 4-93 of the DEIS needs to be corrected. Under the effects of WSR on hydro development for Alternative E it is stated, "This is by far the most restrictive alternative." This is simply untrue. The difference between Alternative A and E is minimal.

*We have added a statement to the Amenity Alternative to clarify this statement.*

I was confused by two tables in Appendix E. In Table E.05A (pg. 7-120)

Segment 4 of the Merced is recommended for scenic status in Alternative A, which seems to be inconsistent with Table E.03A. In Table E.05F (pg. 7-145), Segment 2 of the South Fork San Joaquin is recommended for "scenic" status in some alternatives and for "wild" status in others. As this segment is within the John Muir wilderness the scenic recommendation seems to be unexplainable. There are similar unexplained discrepancies in Segments 3 & 4.

*Scenic designation of Segment 4 was an error. It has been changed to "recreational" designation. We agree that Segment 2 is eligible for "wild" designation. The initial recommendation as "scenic" was made by the Forest management team. After this river is designated a WSR by Congress, the*

*Forest will prepare a Comprehensive Management Plan, and eligibility as a "wild" segment will be reconsidered at that time.*

Figure 3 05 and Table N.01 need to be reconciled. There are projects marked in the figure that are not listed in the table

*The items you mentioned have been changed*

## 398-FORPLAN

**398/1071**

I understand that FORPLAN contains oversimplifications and inaccuracies which adversely effect its prediction ability. Trees don't grow as fast as the Plan projects, and there is no allowance for unforeseen factors such as fire and drought

*Timber yield tables for existing and future timber stands used in FORPLAN were developed from measured growth and mortality in existing timber stands on the Forest. Methods used to project future growth rates are based upon the existing literature in the field of forest mensuration. FORPLAN model explicitly contained estimated loss to fire. Loss due to endemic mortality is included in the timber yield tables.*

**398/1533**

CHEC found the following problems in the Plan: 1) Timber prices are too high. 2) Price trends are unrealistic. 3) Suitable timber base is too large. 4) Timber yield tables are unrealistic. 5) Species cross-subsidization violates Forest Service policy. 6) Planning in cubic feet will cause future declines in board foot sales. 7) Returns on timber investments are unacceptably low. 8) Grazing alternatives are hardwired 9) Most Spotted owl yield tables provide an incentive for old growth. (Please see input #1533 )

*1) and 2) See response to 398/1591*

*3) When FORPLAN runs with price trend data and runs without price trend data were compared, timber volumes did not change This demonstrates that price trends are not causing acres to be retained in the suitable timber base.*

*4) The growth used in the RAM PREP computer model is growth that has been measured within this Forest. This model predicts an increased growth rate of 1-2%, which the Forest does not consider unrealistic.*

*5) Cross-subsidies violate Forest Service policy. Decreasing the minimum price for one species to offset low or negative value of another species is a common practice in California. The fact that this has been done does not automatically mean Forest Service Policy is being violated. CHEC analysis was incomplete and therefore not completely accurate CHEC's analysis did not take into consideration that cost the government would have to incur to remove these lower value trees separately where the land management objectives for the site requires their removal When these costs are included, nearly all the sales comply with the tract value policy. While the compliance to the tract value policy may be debated for the few remaining sales, maximizing dollar returns from each timber sale is a project level decision and is where the determination of policy compliance should be made. The planning analysis conducted for the Forest Plan indicates that the cash returns are expected to exceed costs in each of the 10-year period of the Plan. The 1987 and 1988 test of the Timber Sale Program Information Report System (TSPIRS) supports that expectation.*

*6) Your comment is based on the misconception that the Scribner Log Rule, used to assign board foot values to individual logs for payment, predicts actual wood content of these logs. The reality is that the Scribner Log Rule underestimates small log board-feet and overestimates large log board-feet, as revealed by sawmill studies. These discrepancies are adjusted by the use of overrun factors in the timber sale appraisal process The cubic-foot measure is used in growth and yield estimates for planning because this measurement is not biased by product output expectations. Logs*

*do not have to be sawn into 1-inch thick lumber by a 1/4 inch saw kerf as the Scribner Rule assumes. Actually, logs do not have to be made into lumber at all. They may well be processed to produce any combination of plywood, chipboard, flakeboard, or paper. The Scribner board-foot is currently used because it is accepted by the timber industry. It is obviously obsolete, needing correction factors as it does, and will eventually be phased out. Finally, NFMA calls for cubic-foot measurements in forest planning estimates.*

*7) The 4% interest rate is used because it approximates the long-term costs of capital in the private sector as measured by AAA corporate bonds after adjustment for inflation. Timber prices are realistic in view of recent price trends. Many values, including monetary returns, are realized from regenerating harvested stands.*

*8) The grazing alternatives were formulated by setting upper limit constraints based on the theme of the alternative. These limits were then tested by FORPLAN. The model did not attempt to maximize grazing throughout the Forest. This is apparent when the range of alternatives (25,000 AUMs in Alternative E to 54,000 AUMs in Alternative I) is considered.*

*9) The FORPLAN model was constrained to ensure at least 21,000 acres of suitable habitat will be available for owls at all times. This means that SOHAs cannot be entered until replacement stands meet SOHA requirements. Normally, stands over 140 years old meet these requirements.*

**398/1591**

I see the use of the computer program FORPLAN to be a problem. There is no way the projected timber yields can work without causing more harm than good. Please reconsider and check the prices used in the computers for various types of timber. They are a lot higher than the prices actually paid in sales on the Forest.

*The Forest estimates timber prices for the life of the Plan, based on the average for the period 1978-1982. Prices have not yet recovered from the 1982 recession. However, prices have escalated in recent years and are reasonable in light of recent trends. Prices will be monitored during implementation of the Plan, and extreme changes in market prices may lead to the need to amend the Plan. See Appendix B*

**398/1694**

I wish to applaud your recommendations in the Sierra FORPLAN. I've spent a lot of time working and playing on the Kings River above Pine Flat Reservoir. Let's keep it as it is.

*Thank you for your support.*

**398/1719**

FORPLAN projects short-term yield that cannot be sustained, resulting in the waste of our Forestlands and resources, for short term gain. This over harvest would result in destruction of wildlife habitat and recreation, loss of watershed, soil erosion, siltation of streams, loss of fish, and fishing and flood danger.

*FORPLAN results are carefully evaluated and the FORPLAN model is constrained where the need is indicated by our experience. We will closely monitor the implementation of the Plan and will amend it, as needed. See Plan, Chapter 5.*

**398/1730**

Concerning timber harvest, the Plan's use of FORPLAN and price computer projections are pretty far-fetched. The marginal forests and the red fir should be preserved until such time as they prove profitable. The suitable timber base can better relate to that which can be cut in the next 50 years rather than what is pressured for in the next 10 years. Timber growth tables are inflated, failing to account for hazards year after year. Plan carefully for the Conservative timber harvesting to sustain the forest.

*The Forest plans to offer sales programs as scheduled in the Plan, but will not make up sales deficiencies by cutting more valuable species if red fir sales do not sell. In recent years, all of our sales have been profitable. See response 398/1591 concerning timber prices.*

398/1783

Implementation of FORPLAN requires a differential selection of data, such that significant conditions in the field may not be accounted for. Assumptions regarding the effects of benchmarks and alternatives require field verification, particularly where nonmodeled, nonpriced benefits are concerned. Gathering of pertinent data and understanding of forest resources is an ongoing process.

*The Forest intends to monitor the implementation of the Plan closely. Where indicated by field conditions, the Plan will be amended.*

## 400-PUBLIC INVOLVEMENT

400/0361

I would hate to see the lobbying of small interest groups dictate to the Forest Service what should be done to the public land

*Interest groups do not dictate to the Forest. However, we try to be responsive to public needs and invite public comment from everyone*

400/1528

Information in the DEIS describing the Affected Environment needs to be widely dispersed

*The Forest Service mailed approximately 1,500 copies of the DEIS to interested individuals. We also held eight public meetings, two public hearings, and made presentations in Madera, Mariposa and Fresno Counties.*

400/1531

I suggest you announce your public meetings, not just enough to meet your legal requirements, but enough so that those wanting maximum protection of our forests will know when these meetings are taking place. I declined to speak, because I could not address important issues in five minutes or less.

*Newspaper, radio, and television stations in Fresno, Madera, and Mariposa Counties received press releases about the public meetings. Public interest was high, so we felt that a 5-minute speaking limitation would enable more people to speak. We will consider your requests when future public meetings are called.*

400/1669

Several sections of the Plan describe evaluation, review, amendments, and revisions to the Plan. Some of these reviews are annual. Will the public be notified of the results of these actions?

*The public would be notified if there were significant changes from what was stated in the document.*

400/1817

The Tahoe National Forest publishes a quarterly bulletin which details all major projects proposed on that Forest. It includes timber sales, road construction, hydroelectric projects, etc. This publication is very useful to those who wish to be involved in the ongoing management of the forest. I don't know if the Sierra publishes such a bulletin, but if not, it should.

*The Sierra National Forest does not publish such a bulletin now, but is being considered for future use. Thank you for your suggestion*

## 410-PLANNING PROCESS

410/0085

In many sections of the Plan it becomes obvious that the Forest is operating as an autonomous organization without regard to the cumulative effects that may result from activities proposed on adjacent forests or on the other forests in California. For this reason the SFDTAC recommends that none of the Forest Plans be approved until the cumulative effect of all the Plans can be studied.

*The Regional plan known as the Regional Guide, gives the broad direction from which each Forest in the Region gets its direction. The Forest Plan takes the planning effort one step further and provides the Forest with more specific direction. Likewise, the Central Sierran Forests have coordinated on many strategies for the various resources during this planning effort.*

## 420-MULTIPLE USE CONCEPT

420/0544

With only a small percentage of the Forest that can be harvested, there is plenty of space for owls and other wildlife. Too many people with wives, husbands, and children depend on the industry. Plus stores of all kinds.

With so much wilderness and National Park Land, why ruin the lives of many people.

*It would be nice if each resource used different pieces of the Forest. This would make for fairly easy management. However, this is not the case. Spotted owls require dense oldgrowth forest for habitat, and this is also some of our best timber. Thus we have the conflict to which you refer. We are preparing individual Spotted Owl Habitat Area Management plans so as to determine how timber management and spotted owls can exist together on the same piece of the Forest.*

420/1002

DEIS, pg.1-1- The discussion of the legislative framework is strangely silent about the Multiple-Use Sustained Yield Act (MUSY). It seems fairly clear that NFMA is legislation designed to implement MUSY. This discussion should be expanded to recognize that relationship.

*The chronology of legislation listed on pg.1-1, is specifically related to what led up to Land Management Planning. Since the MUSY Act was implemented well before 1974, there is no direct mention of it in this chronology, although multiple use is mentioned several times in the discussion.*

While we support concepts of multiple-use and sustained-yield as guiding principles for management of the National Forests, we cannot and will not support forest management plans which permit our country's timber resources to go to waste

*We do not agree that the Forest Plan wastes current timber resources. We do agree the Plan results in foregoing some technically feasible future growth.*

420/1702

Sequoia Forest Industries believes that these 394,000 acres must be managed primarily for timber production.

*Your preference was considered in making our decision. There are trade-offs between higher levels of timber production from the suitable, capable and available timber lands and effects on water, fish, wildlife, visual, recreation, local employment and local government finances. All of these effects are described in the EIS and were considered in making the decision.*

420/1840

I've seen some of the timber sales we have up there and some of the harvest I'm quite ashamed of the mess that it's left up there. I don't blame the loggers for it; I blame the Forest Service. We have lost the Multiple Use concept totally

*If you are inferring we should not have logged some particular area, that may be true. We have made some mistakes in isolated areas, but generally speaking we have done a good job over most harvested areas. Our interdisciplinary process analyzes each project area to determine proper management. Thus, we feel we practice good multiple use management.*

420/1841

Again, the key to the Management Plan should be multi-use and not multi-restriction.

*The Forest believes Alternative A gives a good balance of noncommodity and commodity outputs while practicing good multiple use management.*

### 430-FURTHER PLANNING AREAS

430/0226, 1358, 1533, 0005, 0283, 0084, 0207, 1212, 1579, 1708, 0406, 1498 & 1010

Increase roadless area designations.

*We do not have any more areas that fit the criteria of R.A.R E. II. The strategies were all decided in the 1984 California Wilderness Bill except one, Kings River "B," which is now the new Kings River Special Management Area designated by Congress in November 1987. The management of the new area will be very similar to that of wilderness.*

430/1412

The plans to maintain several released areas (formerly designated as wilderness) in their natural (roadless) condition are to be commended, but Merced Canyon, Mt Raymond and Dinkey Creek should also be maintained.

*Released areas were not formerly designated wilderness. They are areas that have been formerly considered for wilderness and are released back to multiple use management. There are no formal plans to maintain released areas in their natural condition. However, each project within the areas will have an environmental analysis completed before any project is implemented.*

### 431-KINGS RIVER FURTHER PLANNING AREA

431/0230

Support Wilderness designation for KRRRA 49m acres and trail building and maintenance.

*See response to 430/0226*

431/0349

I am opposed to Alternative D and any other alternative which will make the Kings River B Further Planning area a wilderness area.

*See response to 430/0226.*

Plan pg. 2-2 states "This plan recommends that the Kings River B Further Planning Area be managed primarily for range and wildlife purposes." I can support that, but it should also include "Prospecting and Mining."

*See response to 430/0226*

**431/0540**

Our membership recommends wilderness designation for the 10,000 acres in the Kings River drainage, or at least keep it a roadless area.

*See response to 430/0226 & 360/1230*

**431/0741**

We ask that Upper Kings Canyon be designated as WSR.

*See response to 360/1230.*

**431/0851**

The Upper Kings River Canyon should be designated as wilderness and should not be clearcut for timber harvesting.

*See response to 430/0226.*

**431/1222**

I support the addition of Unit 63, part of the Kings River Further Planning Area to Wilderness. The area is defacto wilderness and is likely to remain so due to its escarpment factor.

*See response to 430/0226*

**431/1230**

I support the WSR recommendations, and hope you will include Upper Kings Canyon as wilderness

*See response to 430/0226 & 360/1230*

**431/1413**

We hereby request that you include as much of upper Kings River watershed as possible for wilderness designation. We suggest wilderness designations downstream to the Garnet Dyke Campground, or further, if it does not cause problems for fire protection.

*See response to 430/0226 & 360/1230*

**431/1418**

All released roadless areas should be managed entirely for nonmotorized dispersed recreation. No timber harvesting should take place

*See response to 430/0226.*

**431/1467**

Kings River Further Planning Area is unique because of winter accessibility, the lack of woodland chaparral wilderness in this region of California, and a unique river which has been given the Wild Trout designation by the State of California.

*See response to 430/0226.*

**431/1537**

Kings River Further Planning Area - At stake here is one of the largest rivers flowing from the Sierra, in a wild canyon that is said to be the deepest in North America. Part of this region was included in John Muir's original Kings Canyon National Park proposal. It is hard to believe that this grandiose landscape has suddenly become as commonplace and devoid of interest as the description in Appendix C (DEIS) would indicate.

*See response to 430/0226 & 360/1230.*

**431/1581**

We understand that the Forest Service has now discharged all responsibility for the further planning of Area B5-198, pursuant to the California Wilderness Act of 1984. Why then, does the Forest present two alternatives (D & E), which include all, or portions of B5-198 as proposed Wilderness? This is inconsistent with the statement in the DEIS (3-25).

*See response to 430/0226*

**431/1695**

I support Wilderness status for the entire Kings River Further Planning Area. You should at least set aside the eastern one third of the area for Wilderness designation (east of Garlic Spur and Converse Mountain)

*See response to 430/0226.*

**431/1700**

We disagree with the Forest Service's recommendation that the Kings River Further Planning Area be managed for removal of chaparral. The KRFPFA must be fully protected to ensure maintenance of water quality, fisheries, and watershed value for the Kings River. The KRFPFA is unique, because it contains the deepest canyon in North America. The KRFPFA provides winter accessible recreational opportunities which are rare in other Wilderness.

*See response to 430/0226 & 360/1230*

**431/1718**

CSKR finds Alternative E the most satisfactory from its viewpoint. The CSKR strongly urges adoption of our "Wilderness Dispersed Rec." alternative for the KRRA.

*See response to 220/1533.*

It is the CSKR's position that boundaries between 63 and 64 of the KRRA be changed from Garlic Spur to Fox Canyon, and the area above receive a Wilderness designation with remaining area to be managed as "dispersed recreation - no timber harvest." This recommendation is similar to Alternative E, with a slight modification in the Western Wilderness boundary. According to DEIS, demand for dispersed recreation exceeds capacity, and the demand for wilderness will exceed supply in approximately 20 years.

*See response to 430/0226 & 360/1230.*

**431/1775**

I support a wilderness recommendation for all of the KRRA. I also note that this National Forest did recommend the eastern half of this area for wilderness in the past. The Appendix should describe the reasons that caused the Forest Service to change its mind. I am opposed to type conversion of any part of this roadless area.

*See response to 370/0210.*

**431/1806**

Why does the Further Planning Area of Kings River B retain motorized recreational opportunities? There should be no vehicular travel or any other uses which compromise its future uses.

*See response to 430/0226.*

**431/1812**

A revised Forest Plan should include substantially more proposed wilderness in the Kings River Planning Area and all the "released" roadless areas including Devil Gulch and Dinkey Lakes.

*See response to 430/0226 & 370/1811*

431/1817

The major flaw with the amenity alternative which prevented me from endorsing it was the fact that the entire Kings River Further Planning Area was not recommended for wilderness

*See response to 430/0226*

## 432-DINKEY CREEK FURTHER PLANNING AREA

432/0316 & 1395

I support the Conservation Alternative. I like the fact that it includes limiting the Dinkey Creek corridor to developed family and youth - oriented camp area.

*See response to 209/1533.*

432/0989 & 1812

I strongly feel the Forest Plan should have recommended wilderness status for Dinkey Creek, San Joaquin B and Rancheria roadless areas. Each has its own unique beauty which is not necessarily well represented in already designated wilderness on the Forest.

*See response to 209/1533 and 375/0989.*

432/1705, 0017, 1212 & 1672

It is good that Dinkey Creek area is designated as "dispersed recreation - no timber harvest". I think that the Dinkey Creek corridor should also be designated as a developed family and youth oriented campground area. Protect it from future destruction by possible dam construction. Merced Canyon should have designation of "dispersed recreation - no timber harvest", since any timber harvest would result in disqualification of an area for future wilderness designation

*See response to 375/0989 and 361/1533.*

## 440-BIOLOGICAL DIVERSITY

440/0178

Why shouldn't cedar snags be used to meet the prescribed snag densities?

*Research literature and professional observation indicate there is little to no use by primary cavity nesters of cedar snags as a component of their habitat.*

440/1005 & 1669

The reseeded of skid trails, temporary roads, and landings should be done, to the extent practical, with native species of plants. Exotic plantings should be de-emphasized.

*Although planting native species is desirable in some cases, the availability of a seed source is limited and expensive. However, many nonnative plants have proven to be valuable to wildlife and soil stabilization.*

440/1313

The Plan relies on several tools for dealing with the issue of maintaining natural diversity. One of these is the use of MIS. Indicator species do not adequately represent all rare animal species or plants. Quantified objectives must be established to maintain viable populations of all sensitive plant and animal species. We believe that all candidate species for federal listing present in the Forest should be included in the Plan so further reductions in number do not occur and subsequent listings do not become necessary. The Plan must be amended to define which types and stages of

vegetation are targeted, how many acres of each will be maintained, and what active management technique will be used to ensure maintenance of this acreage

*MIS are used because their population changes are believed to indicate the effects of management activities and because they represent vegetation types and seral stages and/or special habitat elements necessary for all fish and wildlife species in the forest. Some sensitive species were not used as MIS because 1) their distribution is very limited or unknown, 2) inventories of important habitat components are not available and there would be no way to predict impact of management activities, or 3) their habitat is predicted not to significantly change. For plants, manual and handbook direction is to maintain viable populations for all alternatives. Plants have very localized occurrence/habitat requirements and would not serve well as MIS. Just because a species is not chosen as an MIS does not mean it receives less management.*

440/1475

We think you should research the slash pine forest in Florida regarding fast growing pines, and their marketability in the timber industry.

*Thank you for your comment. Another division of the Forest Service is responsible for research in productivity of these species.*

440/1654

Reseeding, with just a few selected species, will eventually transform today's forests into tomorrow's tree farms. This entire planned program renders the slogan, "Land of Many Uses," meaningless. Species of flora and fauna could disappear, denying them their rightful place in their ecosystem.

*Generally, it is our policy to reseed or replant those species that were there naturally. Only in special areas, such as developed recreation, would unnatural species be planted.*

440/1669

We need to see more uneven-aged management than is proposed in the current Plan. With the proposed amount of clearcutting, it is doubtful that the Forest can come close to achieving biologically reasonable levels for downlogs, snags, plant species diversity, and structural diversity.

*Thank you for your input. Thirty-five thousand acres of uneven-aged management have been added to the Preferred Alternative. In addition, the FEIS will contain one alternative that has uneven-aged management as its major silvicultural system.*

S&G 40 doesn't define the scale of measurement for "overall" diversity. The scale must be smaller than the entire forest, or needs for wildlife species will not be met.

*Please refer to Chapter 5 of the Plan, which lists the monitoring needs for diversity. Vegetative diversity will be determined by each management area.*

440/1716

The Forests often represent the final place where many facets of biological diversity can be preserved in a natural, self-sustaining manner. CNPS wants to emphasize the value of this management opportunity and point out that future generations may look to our Forest for the last substantial reserves of California's once common forest landscape. Diversity is a special concern of CNPS. Our primary goals are to promote maintenance of existing native species diversity, and the promotion of rare plant species. The Plan provides for maintenance of diversity in terms of structure and age of communities, not the biological diversity which needs to be addressed further.

*Biological diversity is addressed in many S&Gs in the Plan. Maintaining tree species diversity is part of the Regional tree improvement program. The Forest Service is required by the National Forest Management Act of 1976 to maintain viable populations of existing native and desired nonnative vertebrate species and plants. Diversity will be maintained through near natural areas (Wilderness, WSR, RNA, SIA) and managed ecosystems (timber, range, fire, fish and wildlife management.)*

440/1843

Only with forest management practices based on unbiased scientific studies, coupled with unfailing stewardship of forest land, will we retain the botanical heritage of California's Sierras.

*Thank you for your comment.*

#### 450-OTHER GOVERNMENT AGENCIES

450/1825

The National Park Service and the BLM working so closely on a Plan is something I feel should be emulated. To find three federal agencies working together, is something I know we need to see more of

*Thank you for your support*



**T.5  
LETTERS FROM PUBLIC AGENCIES, ELECTED  
OFFICIALS, SCHOOL DISTRICTS AND FOREST  
SERVICE RESPONSES**

**T.5.1  
Introduction**

Following are copies of entire letters received from public agencies, elected officials and school districts. Each comment of each letter has been numbered. Immediately following each letter are the Forest Service responses that have been correspondingly numbered to each comment in the letter. All responses are maintained in the planning records in the Supervisor's Office, 1130 "O" Street, Fresno, California.



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region, HCB  
777 Sonoma Avenue, Room 325  
Santa Rosa, CA 95404

September 17, 1986

F/SWR33:JRB

Mr. James L. Boynton  
Sierra National Forest  
Federal Building, Room 3017  
1130 "O" Street  
Fresno, CA 93721

Dear Mr. Boynton:

Thank you for providing the National Marine Fisheries Service (NMFS) an opportunity to review and comment on the "Draft Environmental Impact Statement, Sierra National Forest, 1986."

1

The NMFS is responsible for preserving and enhancing anadromous fish resources and the habitats that support these resources. We reviewed the material you provided and determined from the information that anadromous fish do not occur within the Sierra National Forest boundaries. Therefore, we have no comments on the draft report.

Sincerely yours,

James R. Bybee  
Environmental Coordinator  
Northern Area

FOR COPY  
SIERRA NATIONAL  
FOREST

SEP 22 1986

ACTING MANAGER

cc: FWS, McKeVitt  
CFG, Lollock

F SUPV \_\_\_\_\_  
DF SUPV \_\_\_\_\_  
AD \_\_\_\_\_

REC \_\_\_\_\_

L & E \_\_\_\_\_  
RANGI \_\_\_\_\_

TIN \_\_\_\_\_

FM \_\_\_\_\_

EPG \_\_\_\_\_

LAWS \_\_\_\_\_

IT \_\_\_\_\_

REC. SECS \_\_\_\_\_

DI \_\_\_\_\_

G. S. \_\_\_\_\_

\_\_\_\_\_



**ltr. 0004**

**UNITED STATES OF DEPARTMENT COMMERCE  
National Oceanic and Atmospheric Administration**

**RESPONSES:**

Thank you for your comments.

# Mariposa County Board of Supervisors



JOAN J. LYNK  
Executive Aide  
P O. BOX 784  
MARIPOSA, CALIFORNIA 95338  
(209) 966-3222

DISTRICT 1 .. BEVERLY BARRICK  
DISTRICT 2 . EUGENE P. DALTON, JR  
DISTRICT 3 ERIC J ERICKSON  
DISTRICT 4 . LEROY RADANOVICH  
DISTRICT 5 . . . GERTRUDE TABER

GERALD McCARTHY  
County Clerk/Ex-officio Clerk of the Board  
MARGIE WILLIAMS  
Deputy Clerk of the Board  
P O Box 247  
MARIPOSA, CALIFORNIA 95338

October 17, 1986

Mr. Iri Everest  
Sierra National Forest  
1130 "O" Street  
Fresno, CA 93721

Dear Mr. Everest:

1

Please enter into the record my endorsement for the retention of dirt bike rights on the existing trail from Iron Mountain down to the South Fork of the Merced River. It is vital that, in our efforts to accommodate the desires of environmental groups, we do not abrogate the rights of other groups to their use of this world. Their needs and desires also must be carefully considered.

Sincerely,

*[Handwritten Signature]*  
BEVERLY BARRICK  
Supervisor, 1st District



# Mariposa County Board of Supervisors



JOAN J. LYNK  
Executive Aide  
P O BOX 784  
MARIPOSA, CALIFORNIA 95338  
(209) 966 3222

DISTRICT 1 . BEVERLY BARRICK  
DISTRICT 2 . EUGENE P. DALTON, JR  
DISTRICT 3 . ERIC J. ERICKSON  
DISTRICT 4 . . . . LEROY RADANOVICH  
DISTRICT 5 . GERTRUDE TABER

GERALD McCARTHY  
County Clerk/Ex-officio Clerk of the Board  
MARGIE WILLIAMS  
Deputy Clerk of the Board  
P O Box 247  
MARIPOSA, CALIFORNIA 95338

December 29, 1986

Forest Supervisor  
Sierra National Forest  
1130 "O" Street, Room 3017  
Fresno, California 93721

Re: Response to Sierra National Forest Resource Management Plan

Attn: LMP

At its meeting of December 9, 1986, the Mariposa County Board of Supervisors took action to support Alternative "A" of the proposed Management Plan for the Sierra National Forest, with the following modifications -- (the modifications are consistent with previously adopted Board policy):

- 2 A. (1) That there be no designation of the South Fork of the Merced River, and that a five-year moratorium be enacted and further studies made of the effects Wild and Scenic designation would have on Mariposa County. (See Exhibit 1 and 2)
- 3 (2) That the main body of the Merced, from Parkline to Briceburg, be placed under the Wild and Scenic Act, with recreational status. (See Exhibit 3)
- 4 (3) That the Merced River be left undesignated from Briceburg to Lake McClure. (See Exhibit 4)
- 5 (4) That the Plan include the recommendation that Mariposa County be included in the management planning and implementation of all Wild and Scenic designations.
- B. That there be carefully outlined guidelines for monitoring/policing off-road vehicle uses adjacent to private property, and for on Forest Service land. (See Exhibit 5)

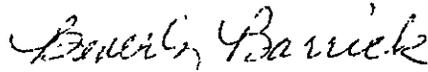


Forest Supervisor  
Re: Response to Management Plan  
December 29, 1986  
Page two

- 6 C. That you specifically protect the rights of recreational dredging on the Merced River.
- 7 D. That there be no quotas placed on rafting on the Merced River, but that the program continue as in the present mode.
- 8 E. That law enforcement costs and capabilities be clearly outlined (continuation of the contract with Mariposa County for a Sheriff's deputy to patrol the Merced River during the tourist season is strongly recommended by the Board). (See Exhibit 6)
- 9 F. Section F, entitled "Timber", be modified to reflect the Board's support of maintaining the timber alternative contained in Alternative H. (See Exhibit 7)

Your consideration of the above is appreciated. Please do not hesitate to contact the Board if we can provide additional information.

Very truly yours,

  
BEVERLY BARRICK, Chairman  
Mariposa County Board of Supervisors

BB:rw

Enclosures - Exhibits 1 through 7

cc: Mariposa County Planning Department  
Irl Everest, District Ranger, Mariposa District  
Mariposa County Sheriff's Department

**ltr. 0056**

**BOARD OF SUPERVISORS  
Mariposa, California**

**RESPONSES:**

1 The decision to determine the future of bike use on the Iron Mountain Trail was not made in this Plan. This decision will be made in the yet to be completed OHV Plan and/or the Comprehensive Management Plan on South Fork Merced River.

2 The Preferred Alternative recommended the Merced River from El Portal to Briceburg be classified "recreation." The final disposition of these segments will be determined within the Comprehensive Management Plan. Federal agencies have the authority to implement these classifications after public, state, and private reviews.

3 Merced River has been left as "undesigned" from Briceburg to Lake McClure.

4 Federal, state, county, public groups, and private citizens will be invited to be involved in the management (implementation) planning process for W/S Rivers. Many federal, state, and environmental groups have been involved in preparing the Wild and Scenic River sections in the draft LMP

5. Monitoring and policing OHV use will be an important consideration in the Forest's OHV Plan, scheduled to be completed by 1992. The Board will have an opportunity to provide input to the Plan.

6. Recreational dredging on Merced River is protected in accordance with the Wild and Scenic Rivers Act of 1968, as amended by P.L. 99-590. Specific guidelines for recreational dredging will be recommended within the specific management (implementation) plan.

7. Any quotas placed on rafting activities will be determined at the specific management (implementation) planning process and reviewed within monitoring guidelines, usually every ten years.

8. Law enforcement and all other management/operational potential costs will be analyzed during the management (implementation) planning process.

9. Raising the ASQ to 160 MMBF was carefully considered. To raise the ASQ would result in more land designated for timber harvest and in fewer protective measures for other natural and social resources.

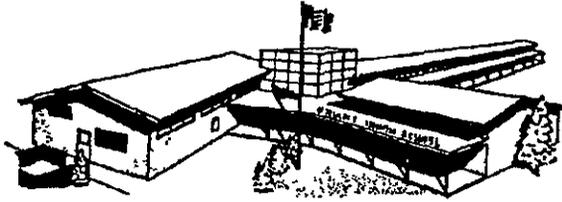
The ID team considered input from many respondents who presented their reasons why the ASQ was too high. They said budget levels to produce this level of harvest are unrealistically high and saw an undesirable subsidy to the timber industry because revenues would not match costs to the government. There was objection to using pesticides to maintain long-term sustained yield, harvesting timber on land only marginally capable of intensive forest management, maintaining resources such as soils, watershed, wildlife habitat, visuals, and open space that needs close attention and protection, and timber products receiving too much emphasis. They request more land be assigned to resources other than timber production.

Arguments from the public opposing your resolution are presented here to emphasize the fact that the land base of the Forest cannot meet all the demands expressed by the public.

The final ASQ is a carefully weighed balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest believes that an increase in the ASQ would result in an unacceptable risk and impact on other values and resources. Conversely, a reduction of the ASQ would result in an unnecessary reduction in the Forest's capability to produce timber on a sustained basis that provides jobs and supports businesses.

Board of Trustees

Eules Grigsby - President  
 John Lane - Vice President  
 Steve Roberts - Clerk  
 Jim Durando - Member  
 Gerald Sharp - Member



Rowland R. King, Ed., D.  
 Superintendent

## Friant Union School

Box 223

FRIANT, CALIFORNIA 93626

209-822-2232

October 30, 1986

Mr. James Boyten  
 Forest Service Superintendent  
 Sierra National Forest  
 1130 "O" Street  
 Room 3017  
 Fresno, CA 93721

Dear Mr. Boyten:

**1** The Governing Board of Friant Union School District has given me authority to write you this letter in opposition to the proposed Forest Service Resolution reducing the maximum allowable timber cut by approximately 18%.

We understand that the Hearing for this is November 13th, but that it is being held in the evening. Unfortunately we have a Governing Board Meeting at the same time. I would appreciate it if you would allow this letter to be placed in opposition to the Resolution reducing the maximum allowable timber cut.

We are a small Elementary school being a part of the larger Sierra Union High School District, and every reduction in funding sources hurts our already "bare bones budget". This in turn hurts the students educational opportunities, hence our opposition.

Thank you for your consideration.

Sincerely yours,

Rowland R. King, Ed. D.  
 Superintendent

cc: Mr. Cliff Sparrow, Superintendent  
 Sierra Elementary School District

We are an EOE and an Affirmative Action Employer

**ltr. 0072**

**FRIANT UNION SCHOOL**

**RESPONSE:**

Your preference for a higher ASQ to help finance schools was considered during our final analysis. There are trade-offs between the higher levels of timber production in Alternatives C and H and the Preferred Alternative. These trade-offs include effects on fish, wildlife, soils, water, riparian zones, visual and recreation resources, local employment and local government finances including the financing of schools. All of these effects are described in the EIS and were considered in our analysis. Your letter and many others stated current harvest levels are too low and if the ASQ is not raised, revenues to counties will decline.

Other respondents gave diverse reasons why the ASQ under the Preferred Alternative was too high. They claim the budget needed to produce that level of harvest is

unrealistically high and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to clearcutting, pesticides and harvesting timber on marginal timber land. They also point out the potential adverse effects of timber harvesting on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They request more land be assigned to resources other than timber production.

The views on ASQ are divergent. Some argue for jobs, families, businesses and schools, while others argue for resources such as Soil, Fish, Wildlife, Riparian zones and Visual quality. It is the Forest's responsibility to analyze all values and needs, then select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets that balance.



State of California  
**Board of Forestry**

1416 NINTH STREET  
SACRAMENTO, CALIFORNIA 95814

**Southern Forest  
District Technical Advisory Committee**

November 10, 1986

James L. Boynton, Forest Supervisor  
Sierra National Forest  
Federal Building, Room 3017  
1130 "O" Street  
Fresno, CA 93721

Dear Mr. Boynton:

Re: Sierra National Forest Draft Plan

The Southern Forest District Technical Advisory Committee reviewed the Sierra National Forest Draft Plan at their regularly scheduled meeting November 6, 1986. Representatives from the Sierra National Forest were on hand to explain the details of the Plan. Following the presentation, the SFDTAC developed a position statement as indicated below. Our comments are based on the eleven land use activities that were displayed on the chart that was used by the staff of the Sierra National Forest during their presentation to the Committee. The comments of the Committee members took into account the interest and concerns that were summarized in the Centennial Action Plan as follows:

- I. Rural economic stability and development;
- II. Protection and maintenance of the biological base;
- III. Social pressures on the rural land base;
- IV. Rights and responsibilities of public and private ownership; and
- V. Coordination of planning.

1. Recreational/Visual....The Committee supported the recommendation which proposed moderate increases in the dispersed and developed recreation. These increases may have a positive effect on several of the Centennial issues such as adding to rural economic stability and satisfying some of the social pressures on the land base. However, increased recreation could potentially threaten the biological base due to the impact of forest users. There is also a minor impact from this activity on private

landowner rights where there is competition from private individuals who are providing the public with recreation for a fee. However, the plan somewhat mitigates this impact by offering concessionaire opportunities in leasing campgrounds, ski areas, and other forest owned facilities.

The Committee finds that the plan does not show a coordination of planning with other forests in the area or with private recreation facilities in its approach to the recreation issue.

2

Visual restrictions recommended in the Draft Plan would adversely effect timber productivity and the Committee found that there would be a negative effect on each of the Centennial issues. Sierra Forest should seek opportunities to practice uneven-aged management within the areas that are shown in the Plan as requiring restrictions due to their visual significance.

3

2. Wilderness....SFDTAC supports the recommendation in the PRF that adds no additional wilderness acres to the Sierra National Forest. This is due to the fact that the Sierra already contains over 500,000 acres of wilderness which affects a significant amount of the land base.

Since the PRF proposes no additional wilderness, the Committee finds that there would be no increased effect on any of the five Centennial issues.

4

3. Wild and Scenic Rivers....The Committee recommends that a very careful study should be made of this issue before the Sierra moves to lock up opportunities to use the resources contained within the areas proposed for wild and scenic river designation. The Committee members are familiar with several proposed hydroelectric projects that may be adversely impacted by this designation such as the El Portel, Jackass Creek, Granite Creek and South Fork Merced River projects.

As proposed in the PRF, the Committee finds that the recommendation to increase wild and scenic river designation on the Sierra National Forest from zero miles to 225 miles would have an adverse impact on rural economic stability and development since local communities would be precluded from benefiting from future potential hydroelectric, mineral and other possible developments. Likewise, the other Centennial issues would be adversely affected.

5

4. Fish/Riparian Habitat....The PRF shows moderate increases in fisherman use of the Sierra Forest and the Committee supported this concept. However, it was noted that riparian requirements would tend to reduce the volume of

available timber approximately 5.25 MMBF per year. Opportunities should be sought by the Forest to increase utilization of the areas designated for riparian protection. It was also noted that the Forest lacked an effective program for monitoring the changes that occur on riparian habitat over time. The Committee recommended that a system should be set up to monitor changes in vegetation species composition in addition to the present system of monitoring the animals and birds that exist in this habitat type.

The Committee finds that consideration should be given to their comment regarding utilization of timber volumes locked up in riparian habitats in order to reduce potential negative impacts to rural economic stability and the other Centennial issues.

6

5. Wildlife Habitat/Diversity.... The Committee disagreed with the PRF in the proposals to provide 18 non-managed habitats for the Spotted Owl. The Committee learned that approximately 7.25 MMBF of timber productivity would be lost due to the provision of restricting harvesting in an area of 1000 acres for each pair of owls. Members found that the information on the needs of the owls was lacking and recommended that further study should be done on the Spotted Owl issue. The study should address the habitat needs and viable population levels on a Statewide basis rather than be restricted to any one national forest recognizing that National Parks and wilderness areas already exist to provide habitat in an unmanaged condition which may be suitable for the owls.

7

The Draft Plan proposes an oak retention of 10% crown cover in general forest and 20% in critical deer areas. The Committee feels that this retention is unnecessarily high and discovered that the provision to leave this level of oak would result in the loss of 2.5 MMBF of timber productivity per year. The Committee recommends that oak retention be set at a level of 5% and 10% respectively in those areas that are suitable for conifer management.

In summary, the wildlife habitat/diversity recommendations in the Draft Sierra Plan would have a negative impact on each of the five Centennial issues. More consideration must be given to the economics of committing such large amounts of resources to the maintenance of wildlife special in deference to commodity outputs.

8

6. Range/Chaparral....The Committee noted the Plan called for a moderate increase in animal unit months on the forest. They also learned that there were no demands by grazing permittees for additional increases in a.u.m.'s. With this in mind, the Committee supported the Plan's proposals for moderate increases in a.u.m.'s and increases in the amount

of acreage proposed for prescribed fire. It was noted, however, that the Plan, as written, fails to comply with the legislation which requires the Forest Service to provide an inventory of public rangeland conditions and trends. Specifically, the Forest and Rangeland Renewable Resources Planning Action of 1974 (Sec. 5), Federal Land Policy and Management Act of 1976 (Sec. 201a), and Public Rangeland Improvement Act of 1978 (Sec. 4a) all require that said report be made available to the public and be kept current on a regular basis so as to reflect changes in range conditions. The DTAC recommended that more emphasis needs to be put on monitoring the rangeland conditions and trends in order to be sure that the current level of grazing and any future increased levels do not adversely impact the health of the rangelands on the forest.

In summary, the Committee found that the activities proposed in the Range/Chaparral communities on the Sierra would have no major impact on any of the five Centennial issues.

- 9
7. Timber....It was noted that the PRF recommends a high percentage of even-aged management and the Committee found this to be commendable since it was a more efficient way of harvesting timber. However, the allowable cut which has been set at 125 MMBF was found to be badly lacking and would result in unemployment and instability in local communities dependent on forest revenues. The Committee recommended that the reduction in allowable harvest should be made up by more intensive management of areas that were set aside for riparian, wildlife habitat and visual needs.

The Committee recommended that the Sierra National Forest revise the PRF so that the average annual allowable timber harvest be maintained at a level equal to the output of the last ten years; i.e., 136 MMBF. The volume could be increased by utilizing areas currently set aside for riparian, wildlife and visual preservation.

10

The Committee also discussed Table 5.01 in the Draft Plan which specified a monitoring program for keeping track of the annual timber harvest volumes. The Sierra intends to monitor the volume at the end of the first five years of the Plan and would be satisfied to be within 15% of the annual harvest at that time. The Committee felt that this was not a strict enough goal and that if the Sierra was this far off in their harvesting program, that it could adversely effect local communities and employment.

The Committee recommended that the monitoring level on timber harvesting volume be reduced from plus or minus 15%

in five years to 5% in five years in order to emphasize the importance of maintaining the level of harvest because of the potential adverse impact to the stability of rural economies.

In summary, the Committee found the PRF would have a significant adverse impact in all areas outlined in the Centennial Action Plan unless it were modified as suggested by motions shown above.

11

8. Soil/Water Quality....The Committee commended the Draft PRF in its goal to maintain and improve the soil and water quality on the forest.

They found there would no impact on the five Centennial issues.

12

9. Geology/Minerals....The DTAC noted a reduction in the proposed number of mining claims on the forest, however, this reduction was due to the state of the economy in regards to mineral exploration and mining activity was not limited in any way by restrictions incorporated into the Draft Plan. The Committee supported the PRF and found that there would be no impact on local communities as a result of the Draft Plan.

13

10. Special Management Areas....The Committee supports the recommendation in the PRF to increase the research natural areas and other special interest areas on the Sierra National Forest. Several of these areas are already in established wilderness areas and the remainder are placed where they should not adversely effect timber outputs.

The Committee finds that increasing special management areas as suggested in the PRF would not have a significant detrimental impact on any of the five Centennial issues.

14

11. Transportation....The Committee noted that the road system on the Sierra was pretty well in place already and that new construction was not needed to access timber areas. The Draft Plan called for a reduction in the number of miles of roads to be constructed or reconstructed. However, the Committee pointed out that these miles would need to be increased in order to meet the DTAC's goal of increasing timber production to the 136 MMBF level. Otherwise, the Committee supported the PRF in the area of transportation.

15

12. Other General Comments....In many sections of the Plan, it becomes obvious that the Sierra is operating as an autonomous organization without regard to the cumulative effects that may result from activities proposed on adjacent forests or on the other Forests in California. For example, when the Sierra Plan discusses economic benefits that are derived from the forest as they impact

local communities, there is a failure to recognize the benefits that come from other National Forests located in the same area. In order for the Board of Forestry and the general public to be able to comment on the Plan, they really need to be informed of the overall impact of all the Plans on a Statewide basis. For this reason, the SFDTAC recommends that none of the Forest Plans be approved until the cumulative effect of all the Plans can be studied.

16

Additionally, the economic analysis in the Plan appears to be inadequate and NEPA contains requirements for an improved analysis of the impacts of the Plan and the Alternatives on the local economy. Such an analysis should also include inter-relationships with other forests and with private industry operating in the same area. It would be helpful to see the impact of the Plan and the Alternatives on private timberland owners who possess the same commodities in competition with the National Forest.

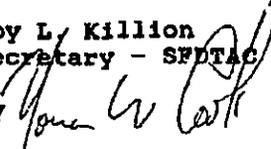
17

Finally, the DTAC noted that the discussion in the Plan on forest protection activities is lacking. The elements of fire protection and insect and disease prevention is basic to the protection of the maintenance of the biological base and these activities deserve a much more thorough analysis. Fire prevention and suppression activities must be coordinated with the State, other agencies and other National Forests.

In summary, the DTAC supported the PRF with the exceptions noted in the discussion above. If the recommendations of the Committee are accepted, there would be an increase in the scheduled harvest volumes over the life of the Plan due to an increased level of harvest in areas currently designated for riparian, visual and wildlife preservation. The result of recommendations made by the DTAC would be to stabilize rural economies, provide better opportunities to maintain the biological base, be more responsive to social pressures and employment, be more responsive to the rights of public and private ownership and would greatly increase the coordination of planning.

Sincerely,

Roy L. Killion  
Secretary - SFDTAC

By 

Norman W. Cook  
Alternate Secretary

NWC: rmd  
cc: SFDTAC Members

**State of California  
BOARD OF FORESTRY  
Southern Forest District Technical Advisory Committee**

**RESPONSES:**

1. The Forest's charge was to plan for 1,300,000 acres Planning efforts in recreation primarily stayed within the boundaries of the Forest.

2. Uneven-aged management is one strategy considered for foreground views from sensitive roads, developed recreation areas, and other sensitive viewsheds. Two alternative plans have been included, revised Alternative A and Alternative E which now contains 30-50% uneven-aged managed forest.

3 Thank you for supporting the Preferred Alternative, which adds no additional wilderness to the Forest. The California Wilderness Act of 1984 has already added 227,778 acres to the Forest, with an overall total of 527,938 which is about 40% of the current land base Additionally, about 49,000 acres have been designated as a recreational Special Management Area by Congress in 1987, and will be managed similar to wilderness areas.

4 A careful study has been made of the 227 miles of potential W/S Rivers. Socioeconomic conditions were analyzed for each river recommendation Yosemite National Park, Sequoia-Kings National Park, Inyo National Forest, Stanislaus National Forest, and the Bureau of Land Management were involved for river segments outside the Forest boundaries No adverse impacts were found.

5 Management requirements for riparian areas emphasize protection of riparian-dependent resources The ID team's decision indicated that harvesting more than 4% per decade would adversely affect riparian-dependent species.

6 Based on current information, 1,000 acres of suitable habitat is needed to maintain a breeding pair of Spotted owls The Forest agrees that further studies are needed and are participating in region-wide monitoring of Spotted owl populations. Managing timber in SOHAs is permissible where 1,000 acres of suitable habitat is provided for in all time periods Many SOHAs are located in places like Wilderness and Nelder Grove, where they have little or no effect on ASQ

7 It is unfortunate that you do not support the oak retention standards. This standard was accepted in the ID team decision-making process It does not meet all timber

management expectations nor does it meet all the needs for wildlife management. Both timber and wildlife interests were well represented in all ID team meetings. This decision should maintain acceptable wildlife habitat yet produce fairly high timber yields The economics of the ASQ decision was a major public issue and is discussed in a separate section.

8. Thank you for your support of increased AUMs and increased acreage for prescribed fire. Allotment management plans contain inventories of range conditions and trends. The Forest Service updates this information periodically as management plans are revised These plans are available for review by the public.

9. The trade-off between ASQ and more intensive management in riparian wildlife habitat and visual areas was carefully considered

10 The purpose of monitoring is to focus on indicators that suggest when the entire Plan needs review. In other words, if the amount of timber sales during that five year period is plus or minus 15%, the whole plan is reviewed and revised, if needed. A variance of 5% would not be enough to warrant this effort and expense. However, the Forest shares your concerns and has developed internal systems to ensure the ASQ is met

11, 12, and 13 Thank you for your support.

14. The transportation system will be developed to adequately have access to the harvestable timber. If the ASQ was raised, more miles of road construction would be included in the Preferred Alternative.

15 The regional plan known as the Regional Guide provides the broad framework of direction for each National Forest. The Forest Plan takes this planning effort one step further and provides the Forest with more specific direction The central Sierra Nevada Forests have coordinated various strategies for resource use and protection during the planning effort.

16 A revised economic analysis will be included in the final EIS It will address the impacts of the ASQ on the local economy, other forests, and private industry. Please see Appendix L in the Appendices volume.

17. The planning records and supporting documentation contain a more detailed analysis related to fire protection, and insect and disease problems The discussion in the Plan is based on this. In the Preferred Alternative there is increased effort for cooperation with all agencies responsible for wildland management.

# BIG CREEK SCHOOL DISTRICT

Box 98, Big Creek, California 93605

Phone: (209) 893-3314

November 12, 1986

Mr. James L. Boynton  
Forest Supervisor  
Federal Building, Room 3017  
1130 "O" Street  
Fresno, California 93721

Reply to: 1950

Dear Mr. Boynton,

School Trustees of the Big Creek School District wish to respond to the Draft Environmental Impact Statement and Proposed Land and Resource Management Plan in regard to timber sales and the alternatives proposed in the plan.

1 It is the opinion of the school trustees that there is an obvious balance which recognizes a LTV and balance for future years neither impacts the area with clear cutting, etc., environmentally and reduces the harvest in future years, nor impacts individuals, companies and agencies financially by harvesting below a level which the area can support. It appears that the 140 to 150 million board feet annually harvested was within that balance, however, we believe it would be prudent to ask the U.S. Forest Service for this analysis. This study should project what the financial impact would be. For example, if a reduction from the current 152 million board feet to the proposed 125 million or 18% reduction would impact.

In conclusion the forest is our local environment and we want it managed for now and the future in the most efficient manner. We believe the U.S. Forest Service should provide these figures and the proper balance for the present and the future.

Respectfully,

  
Edwin B. Swanson  
District Superintendent

EBS/mf

**ltr. 0176**

**BIG CREEK SCHOOL DISTRICT**

**RESPONSES:**

1. The DEIS and FEIS analyze both financial and environmental impacts of a range of alternatives. The final ASQ is a lower timber production level than envisioned in the DEIS (125 6 MMBF annually) and lower than the

historical average (133 MMBF), because it responds to changes in management direction that provide greater protection to other resources. It also recognizes designation by Congress of timberland into wilderness. Timber management will be conducted on 328,900 acres of the Forest's 393,700 acres identified as tentatively capable, available and suitable for timber production.

Thank you for your comments and interest in the Sierra National Forest.



## United States Department of the Interior

NATIONAL PARK SERVICE  
 SEQUOIA AND KINGS CANYON NATIONAL PARKS  
 THREE RIVERS, CALIFORNIA 93271

IN REPLY REFER TO:

L7619(WR-RP)

November 12, 1986

### Memorandum

To: Regional Director, Western Region

From: Superintendent, Sequoia and Kings Canyon National Parks

Subject: Sierra National Forest, Land and Resource Managemnt  
 Plan and Draft Environmental Impact Statement

Our comments on the subject plan and DEIS are essentially limited to proposals that could affect the Park resources or visitor experience. There is little potential for significant effect on Park resources, values or visitors. The reasons for this are that most of the western boundary of Kings Canyon National Park joins the Sierra National Forest and all of that portion of the Sierra National Forest is designated wilderness. Therefore, even though some consumptive uses (grazing, etc.) are allowed on the part of the Forest next to the Park, management there is generally quite similar to management of the Park.

### PLAN

- 1 Page 2-1 Under Wild and Scenic Rivers, a major issue not listed is which segments of rivers will be proposed for inclusion in the Wild and Scenic River System.
- 2 Page 3-5 We endorse designation under the Wild and Scenic Rivers Act of those portions of the South Fork of the San Joaquin and Middle Fork of the Kings that are located in these Parks. We would also encourage consideration under the Wild and Scenic Rivers Act of those portions of the same river systems not located in the Park.
- 3 Page 4-50 Item #368 proposes new trail construction. We recommend coordination with NPS on any trails that would have an effect on the use of Kings Canyon National Park.
- 4 Page 5-1 We see no indication of a monitoring program for the effects of backcountry use. We would encourage a monitoring program because it would enhance the interagency efforts toward consistent management of wilderness areas in the Southern Sierra.

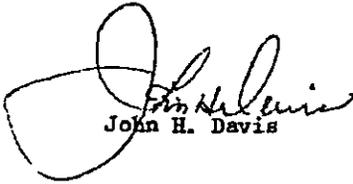
## DEIS

- 5 Page 2-30 The 1,000 acre cutoff for fire confinement/containment on unbroken fuels seems nebulous. What is the definition of unbroken fuels and how do they relate to fire behavior and unnatural amounts of fuels? Perhaps this will be explained in a fire management action plan.
- 6 Page 2-42 The section on wilderness includes 30 miles of new trail construction by 2030. The impacts of that trail construction should consider possible effects to Kings Canyon National Park for any that are located nearby.
- 7 Page 2-42 The section on Wild and Scenic Rivers states that the South Fork of the San Joaquin and Middle Fork of the Kings Rivers will be proposed for designation under the Wild and Scenic Rivers Act. We endorse these designations for the portions within the Park and are pleased to see the sections outside the Park also proposed. We note that Chapter 3 (page 3-38) does not include a description of the affected environment for the Middle Fork of the Kings River.
- 8 Page 3-28 The next to last paragraph indicates that prescribed fire will be used. In Chapter 4 under Wilderness on page 4-37, the effects of prescribed fire are described. There is no indication of any limitation on the use of prescribed fire. We assume that there will be a fire management plan which will provide guidance for the use of prescribed fire. Any prescribed fire program in areas that could affect the Park should be coordinated through the cooperative procedures currently in place.
- 9 Page 3-43 We would be happy to cooperate with the Forest Service where our funding and manpower permit toward studies and projects to enhance several of the Species of Special Interest including Peregrine Falcon, Bald Eagle, Goshawks, Spotted Owl, Willow Flycatcher and Mule Deer. We note that Chapter 4, page 4-45 indicates that all of the alternatives include continuation of grazing which will have adverse effects on willow flycatcher habitat. Preliminary studies done in Sequoia and Kings Canyon National Parks indicate that areas used by livestock have higher populations of cowbirds which have a direct adverse effect on willow flycatchers. We urge further study and consideration of modifying grazing programs where possible to enhance willow flycatcher habitat.
- Page 4-38 Again we note and endorse the proposal to designate the South Fork of the San Joaquin and Middle Fork of the Kings under the Wild and Scenic Rivers Act. This is proposed in all but Alternative B, the no action alternative.

Page 4-44 Once again we are interested in the Species of Special Interest as mentioned above.

Page 4-54 In all of the alternatives we recomend consideration of the willow flycatcher habitat in range management programs.

We appreciate the opportunity to review the Plan and DEIS.



John H. Davis

**UNITED STATES DEPARTMENT OF THE INTERIOR  
National Park Service**

**RESPONSES:**

1. Consideration has been given to rewriting the issue to read, "Which segments of the rivers that were identified in the Nationwide Rivers Inventory of January 1982 will be analyzed for eligibility classification and recommended for inclusion and managed under the Wild and Scenic River Systems?"

2. In the draft LMP the Forest considered over 225 miles of potential W/S Rivers including sections of South Fork San Joaquin and Middle Fork Kings, located within lands managed by three national forests, two national parks, one national monument, the Bureau of Land Management, the State of California and some private lands. The Forest will manage about 73 miles of those recommended potential W/S Rivers within their administrative boundaries.

3. It is Forest's practice to coordinate with adjacent landowners, whether private, state, county, or federal agencies, prior to any development that might affect or impact them.

4. Backcountry use is currently monitored along with other recreational activity. Specific monitoring of this type is not part of the Plan. However, backcountry use is expected to be reviewed as wilderness quotas and management plans are revised.

5. The 1,000-acre cutoff was chosen because of an analysis of wilderness related to existing fuels in the wilderness, best judgement on fire behavior if those fuels were to be ignited under average weather conditions, and the personnel needed to monitor or suppress fires. Unbroken fuels is when an area contains layers such as slash, duff, or standing trees in such a way that if a fire were to sweep through, there would be nothing to stop it. A broken fuel is one that is segmented by a road, ridge, or rock outcrop to stop a fire from continuing.

6. Coordination with Kings Canyon National Park will take place prior to any new trail construction that might affect the Park.

7. Thank you for endorsing these recommendations. DEIS Chapter 3 does not include a description of Middle Fork Kings River, but it is the same description found in the Appendix. It was labeled North Fork Kings River instead of Middle Fork Kings River. This error will be corrected.

8. Prescribed fire will be addressed in the implementation phase of the Plan in Fire Management Action Plans.

9. Your offer of assistance is appreciated. You will be contacted when the studies begin. The S&Gs for riparian zones have been modified to better protect wildlife habitat. Protection measures such as the regulation of the timing and distribution of grazing and structure controls will be planned and implemented. Several projects to improve Willow flycatcher habitat are planned, and at least two should be completed in fiscal year 1989.

**MADERA COUNTY****AIR POLLUTION CONTROL DISTRICT**

W. E. Sturk, Acting  
Air Pollution Control Officer

• 135 WEST YOSEMITE AVENUE  
• MADERA, CALIFORNIA 93637  
• (209) 675-7823

December 2, 1986

Mr. James L. Boynton, Supervisor  
Sierra National Forest  
1130 "O" Street  
Fresno, CA 93721

Dear Mr. Boynton,

Our analysis of the various alternatives of the Proposed Sierra Forest Plan lead us to conclude that each of the alternatives has its strong and weak points depending on an individual's point of view. We believe it would be unfortunate to over emphasize (to detriment of other legitimate needs and uses) any one point of view.

Consequently, we urge the adoption of an alternative that neither tends to lessen or destroy the perpetual enjoyment of the National Forest or the economic benefits of its resources.

- 1 We believe C-RPA and H-MKT come closest to reasonably satisfying the needs and desires of the citizens of Madera County — both plans offer an acceptable middle ground.
- 2 A - PRF would be acceptable except that our town of North Fork and its lumber mill probably could not survive the effects of the restricted lumber availability during the period of 1987-1995.

Sincerely,



W. E. Sturk  
Acting APCO

WES/dh

**MADERA COUNTY  
Air Pollution Control District**

**RESPONSES:**

Your preference for Alternative C and H was considered during our final analysis. There are trade-offs between the higher levels of timber production in Alternatives C and H and the Preferred Alternative. These trade-offs include effects on fish, wildlife, soils, water, riparian zones, visual and recreational resources, local employment and local government finances. All of these are described in the EIS and were considered in our analysis.

Your letter and many others stated current levels of harvest are too low, and if the ASQ was not raised to approximately 160 MMBF, the revenues to Madera County would decline. Other respondents gave diverse reasons why the ASQ in the Preferred Alternative was too high. They claim the budget needed to produce that level of harvest is unrealistically high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvesting on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They requested that more land be assigned to resources other than timber production.

Timber industry advocates claim this amount is insufficient to support mill operations at levels like those favorable conditions experienced in 1986, 1987, and 1988. Should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The impact of increased competition will not spread evenly among the five mills that have been purchasing timber from the Forest. The least competitive mills will reduce operations before those with better locations and more efficient equipment and operations.

The general pattern of mill closures in California indicates that mills located in mountain locations are at a competitive disadvantage to those located in the Central Valley. The highway network allows mills located in the valley to haul logs from a broader supply area than mills located in the mountains. Hauling logs from a larger supply area also allows mills to expand and take advantage of economies of scale.

As competition increases, a mill such as the North Fork mill, rather than the other mills now purchasing the Forest's timber, is more likely to reduce operations. This is a consequence of its mountain location and exclusion from small business set-aside areas available to the Madera and Sacramento mills. The Auberry, Dinuba, and North Fork mills are under single ownership, and during periods of market weakness, the owners historically have curtailed operations at the North Fork mill first. Although an investment in a cogeneration plant makes this mill more cost effective, the mill is still less efficient than the other mills. Cogeneration provides a small edge or cancels the disadvantage of the mill's poor location. Based on the history of this area's mill operations, the Forest would have to provide 137 MMBF ASQ to the local mills in order to provide the North Fork mill with sufficient timber at prices that would allow it to remain competitive.

A loss of timber-related employment opportunities in the foothill area is possible over the next 15-25 years even if the Forest could sustain annual harvests in the neighborhood of 150 MMBF. This decline would occur as a consequence of more efficient capacity added to mills in more favorable locations and increased competition from mills outside the traditional market area. Additional information on the regional timber demand status has been added to the final EIS as Appendix L.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for resources such as Soil, Fish, Wildlife, Riparian zone, and Visual quality. It is the Forest's responsibility to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.



## CITY OF REEDLEY

POLICE SERVICES  
843 G STREET  
REEDLEY, CA 93654-2697

CITY HALL  
845 G STREET  
REEDLEY, CA 93654-2698

PARKS AND RECREATION  
100 N EAST AVENUE  
REEDLEY, CA 93654-3103

TELEPHONE  
209 638-6881

CITY COUNCIL  
DR LAWRENCE R WILDER  
MAYOR  
EMERY L. HUEBERT  
MAYOR PRO TEMPORE  
CHARLES Y TAGUCHI  
RAY SOLENO  
CHRIS W. CROISSANT

December 3, 1986

Mr. James L. Boynton, Supervisor  
Sierra National Forest  
1130 "O" Street  
Fresno, CA 93721

Dear Mr. Boynton:

1 The City of Reedley would like to respond to the Sequoia National Forest Management Plan now that it is out and plans are underway to implement the plan. It is our understanding that the preferred alternative selected by the Forest Service would reduce timber harvesting by 20%. This alternative was selected despite a Forest Service figure showing that timber volume could actually be increased by 25%.

2 Sequoia Forest Industries is a very good neighbor of our City, furnishing employment for many Reedley citizens. We are very concerned with the impact of your Forest Management Plan on Sequoia Forest Industries. Employment and the related effect it has on our Community is very important. Your very serious consideration of this Management Plan should take into account the effect on the local economy. Actions such as your Management Plan can have a very serious effect on our Community's economy.

Thank you for your consideration.

Sincerely,

Thomas M. Butch  
City Manager

TMB:eav

cc Sequoia Forest Industries

86-141

**CITY OF REEDLEY**

**RESPONSES:**

1 Your preference for increasing the ASQ was considered during our final analysis. There are trade-off between the higher levels of timber production in Alternatives C and H and the Preferred Alternative. These trade-offs include effects on fish, wildlife, visual, and recreation resources, local employment and local government finances. All of these effects are described in the EIS and were considered in our analysis.

2 Your letter and many others stated that current levels of harvest are too low, and if the ASQ was not raised, revenues to timber dependent local communities would decline.

Other respondents gave diverse reasons why ASQ under the Preferred Alternative was too high. They claim the budget needed to produce this level of harvest is unrealistically high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvesting on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They requested more land be assigned to resources other than timber production.

Timber industry advocates claim this amount is insufficient to support mill operations at levels like those favorable conditions experienced in 1986, 1987, and 1988. Should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The impact of increased competition will not spread evenly among the five mills that have been purchasing timber from the Forest. The least competitive mills will reduce operations before those with better locations and more efficient equipment and operations.

The general pattern of mill closures in California indicates that mills located in mountain locations are at a competitive disadvantage to those located in the Central Valley. The highway network allows mills located in the valley to haul logs from a broader supply area than mills located in the mountains. Hauling logs from a larger supply area also allows mills to expand and take advantage of economies of scale.

As competition increases, a mill such as the North Fork mill, rather than the other mills now purchasing the Forest's timber, is more likely to reduce operations. This is a consequence of its mountain location and exclusion from small business set-aside areas available to the Madera and Sacramento mills. The Auberry, Dinuba, and North Fork mills are under single ownership, and during periods of market weakness, the owners historically have curtailed operations at the North Fork mill first. Although an investment in a cogeneration plant makes this mill more cost effective, the mill is still less efficient than the other mills. Cogeneration provides a small edge or cancels the disadvantage of the mill's poor location. Based on the history of this area's mill operations, the Forest would have to provide 137 MMBF ASQ to the local mills in order to provide the North Fork mill with sufficient timber at prices that would allow it to remain competitive.

A loss of timber-related employment opportunities in the foothill area is possible over the next 15-25 years even if the Forest could sustain annual harvests in the neighborhood of 150 MMBF. This decline would occur as a consequence of more efficient capacity added to mills in more favorable locations and increased competition from mills outside the traditional market area. Additional information on the regional timber demand status has been added to the final EIS as Appendix L.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for soil, fish, wildlife, riparian zone, and visual quality. Our responsibility is to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.

SACRAMENTO ADDRESS  
STATE CAPITOL 95814  
TELEPHONE (916) 445-7559

DISTRICT OFFICES  
1711 FULTON MALL - SUITE B14  
FRESNO CA 93721  
TELEPHONE (209) 364 3079

512 N IRWIN, SUITE A  
HANFORD, CA 93230  
TELEPHONE (209) 582-2869

3191 M STREET SUITE A  
MERCED, CA 95340  
TELEPHONE (209) 384 1194

# Assembly California Legislature

COMMITTEES  
CHAIRMAN  
WATER PARKS & WILDLIFE

MEMBER  
HOUSING & COMMUNITY  
DEVELOPMENT  
ELECTIONS & REAPPORTIONMENT  
NATURAL RESOURCES

JIM COSTA

ASSEMBLYMAN THIRTIETH DISTRICT

December 3, 1986

James L. Boynton  
Forest Supervisor  
1130 O Street  
Fresno, California 93721

Dear Mr. Boynton:

I am writing in regard to the proposed Timber Harvesting Plan for the Sierra National Forest.

I represent western Madera County in the California State Assembly. I am concerned, therefore, on any federal decisions which might have an adverse impact on the local economy. A constituent has written my office expressing concern that a reduction in the number of board feet allowed for harvest could reduce the number of jobs in Madera County related to the timber harvest.

Please consider balancing the economic needs of the region, as well as the environmental concerns of the Forest Service, when proposing a new Timber Harvest Plan for the Sierra National Forest.

Thank you for your time and consideration of this request.

Sincerely,



JIM COSTA  
Member of the Assembly  
30th District

JC:br

**JIM COSTA**  
California State Assembly  
Thirtieth District

**RESPONSES:**

Your view towards balancing the economic needs of the area as well as environmental concerns were considered during our final analysis. There are trade-offs between the higher levels of timber production in Alternatives C and H and the Preferred Alternative effects on fish, wildlife, soils, water, riparian zones, visual and recreational resources, local employment and local government finances. All of these are described in the EIS and were considered in our analysis.

Your letter and many others indicate concern that current levels of harvest are too low, and if the ASQ was not raised revenues and employment in Madera County would decline.

Other respondents gave diverse reasons why ASQ under the Preferred Alternative was too high. They claim the budget needed to produce this level of harvest is unrealistically

high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvesting on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They requested that more land be assigned to resources other than timber production.

Timber industry advocates claim the amount of harvest in the Preferred Alternative is insufficient to support mill operations at levels like those favorable conditions experienced in 1986, 1987, and 1988. Should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for soil, fish, wildlife, riparian zone, and visual quality. Our responsibility is to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.

SACRAMENTO OFFICE  
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ROOM 5086  
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DISTRICT OFFICE  
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FRESNO CA 93727  
(209) 445-5541

# California State Senate



**ROSE ANN VUICH**  
STATE SENATOR  
FIFTEENTH SENATORIAL DISTRICT  
FRESNO AND TULARE COUNTIES

December 1, 1986

COMMITTEES  
CHAIR BANKING AND  
COMMERCE  
AGRICULTURE AND WATER  
TRANSPORTATION  
LOCAL GOVERNMENT  
JOINT COMMITTEES  
VICE CHAIR RULES  
FAIRS AND ALLOCATIONS  
THE ARTS  
CHAIR SOLID AND HAZARDOUS  
WASTE  
RURAL ISSUES  
RURAL CAUCUS  
FOREST LAND ISSUES

Mr. James L. Boynton, Supervisor  
Sierra National Forest  
1130 O Street  
Fresno, Calif. 93721

Dear Mr. Boynton:

1

My staff and I have studied in detail the proposed Forest Management plan for the Sierra National Forest. After considerable discussions on the matter, I would like to recommend alternative H-MKT to be the plan. I do not support a reduction in the present timber sale allowance, which, as I understand, is approximately 150 MM feet per year. Your analysis shows that 170 MM or so would still support a sustained yield. The H-MKT plan would allow approximately 160 MM feet per year, so would not only give a margin to you, but would also support the mills in the area.

Thank you for your consideration in this matter.

Sincerely,

ROSE ANN VUICH

RAV:et

Itr. 0339

**ROSE ANN VUICH**

**State Senator**

**RESPONSES:**

Your preference for Alternative H was considered during our final analysis. There are trade-offs between the higher levels of timber production in Alternative C and H and the Preferred Alternative including effects on fish, wildlife, soils, water, riparian zones, visual and recreational resources, local employment and local government finances. All of these are described in the EIS and were considered in our analysis.

Your letter and many others stated that current levels of harvest are too low to support mills in the area. Other respondents gave diverse reasons why ASQ under the Preferred Alternative was too high. They claim the budget needed to produce this level of harvest is unrealistically high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government.

There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvesting on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They request more land be assigned to resources other than timber production.

Timber industry advocates claim the ASQ in the Preferred Alternative is insufficient to support mill operations at levels like those favorable conditions experienced in 1986, 1987, and 1988. However, should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for soil, fish, wildlife, riparian zone, and visual quality. Our responsibility is to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.

**COOPERATIVE EXTENSION  
UNIVERSITY OF CALIFORNIA**

Agronomy and Range Science Extension

Mailing Address  
Agronomy Extension  
137 Hunt Hall  
University of California  
Davis, California 95616

James L. Boynton, Forest Supervisor  
Sierra National Forest  
1130 "O" St.  
Fresno, CA 93721

November 17, 1986

Dear Jim,

Through the public review process for the Proposed Sierra National Forest Land and Resource Management Plan we pointed out the weaknesses of the proposed monitoring program for Range and Riparian ecosystems. Your range management staff has requested that we respond in writing and present our solutions to the monitoring problem.

**1**

Continuation of cattle and recreation stock use on the Sierra National Forest requires that its impact on the range and riparian resources be monitored. Monitoring of: (1) actual use of livestock, expressed in AUM's; (2) forage utilization on higher elevation perennial grasslands and mountain meadows expressed in pounds per acre residual dry matter or based on weight-weight relationships; (3) trend on areas with perennial forage species, expressed as changes in species composition using species frequency; and (4) residual dry matter on lower elevation annual grasslands must be integrated. With this information objective decisions can be made which will ensure the protection and maintenance of the biological base and stability and development of the rural economy.

DEC 11 1986  
ACTION: [ ]  
I SUPV [ ]  
DF SUPV [ ]  
AD [ ]  
REC [ ]  
I & C [ ]  
RANGE [ ]  
TM [ ]  
FM [ ]  
ENGR [ ]  
LANDS [ ]  
PR [ ]

Monitoring programs proposed in the Forest Land and Resource Management Plan are monitoring of:

- 1. Livestock use (AUM's)
- 2. Forage utilization

The University of California Cooperative Extension in compliance with the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972 and the Rehabilitation Act of 1973 does not discriminate on the basis of race, creed, religion, color, national origin, sex, or mental or physical handicap in any of its programs or activities, or with respect to any of its employment policies, practices or procedures. The University of California does not discriminate on the basis of age, ancestry, sexual orientation, marital status, citizenship nor because individuals are disabled or Vietnam era veterans. Inquiries regarding this policy may be directed to the Affirmative Action Officer, 2120 University Avenue, University of California, Berkeley, California 94720 (415) 644-4270.

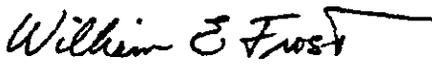
University of California and the United States Department of Agriculture cooperating

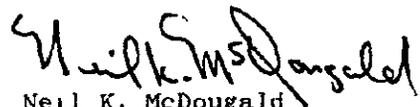
We urge you to utilize these resources in implementing a trend monitoring program to complement the monitoring programs identified in the proposed Forest plan.

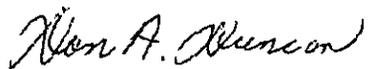
The important parameter to be monitored on annual grasslands is the amount of residual dry matter left on the site. It is the residual dry matter which provides favorable microenvironments for early seedling growth, soil protection, adequate soil organic matter and a source of low-moisture fall forage. Details of monitoring residual dry matter are contained in the Region 5 Range Analysis Handbook (FSH 2209.21), and this program should be followed.

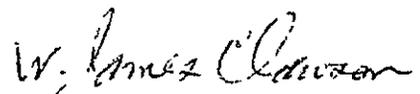
We also recommend the hiring of personnel educated and trained in range ecology/management. A shortcoming of the range management program on the Sierra National Forest is the lack of personnel educated and trained in Range Ecology/Management. Educated range professionals must be hired, and participate in continuing education programs, so that qualified personnel are interpreting range management data, making management decisions and developing management strategies.

Cordially,

  
William E. Frost  
Postdoctoral Research Fellow  
C.A.T.I., C.S.U. Fresno

  
Neil K. McDougald  
Madera County Range and  
Livestock Farm Advisor  
U.C. Cooperative Extension

  
Don A. Duncan  
Director, SJER  
C.A.T.I., C.S.U. Fresno

  
W. James Clawson  
Range Specialist  
U.C. Cooperative Extension

**Itr. 0412**

**COOPERATIVE EXTENSION  
UNIVERSITY OF CALIFORNIA, DAVIS**

**RESPONSES:**

1. The Forest has added to the monitoring section of the plan the monitoring of range condition and trend, expressed as changes in species composition; forage utilization in high elevation meadows expressed as percent of allowable use; and forage utilization of annual grassland expressed as residual dry matter RDM.

We have added trained personnel educated in range management principles at the Ranger District level and plan to continue our Range Plant Identification workshops here on the Forest to maintain the needed botanical skills to conduct species composition frequency measurements. The range management personnel and seasonal aids will participate in the continuing education programs sponsored by the Region and other groups such as U. C. Extension to upgrade their professional skills so that sound management decisions can be made to protect and maintain the stability and development of the rural economy.



United States  
Department of  
Agriculture

Forest  
Service

PSW

Reply to: 1900

Date: December 29, 1986

Subject: Sierra Plan Comments

To: Forest Supervisor, Sierra NF

We would like to offer the following comments and suggestions on the Sierra NF draft plan and environmental impact statement. These comments are based on FSM-4062, R-5's Supplement No.1 to it, our desire for consistency across Forests, the unique nature of the San Joaquin Experimental Range, and a few errors in need of correction.

Draft Management Plan

- 1 Page 3-17. 3.20.2 RNA. The official title of "the blue oak - digger pine" RNA is the San Joaquin Experimental Range Research Natural Area. This title should be used here and elsewhere in the Plan and EIS to avoid confusion.
- 2 Page 4-11. 4.3.18. Name of RNA. See p.3-17.
- 3 Page 4-16. 4.4.10. While we don't deny public access to experimental areas, we do discourage it. We suggest wording on recreation be changed to "Dispersed recreation will be limited..." and delete "...recreational opportunities will occur in unroaded natural settings".
- 4 Page 4-16. 4.4.11. We are not sure what the best way to handle the range prescription since it is being managed by California State University-Fresno under a cooperative agreement with us. A management plan is included in the agreement. In addition, the Range is not considered national forest land since it is not part of the public domain nor is it within the boundaries of the National Forest. Two options exist: 1) exclude the Range from consideration in the LMP, or 2) make the prescriptions conform to the existing management plan and cooperative agreement with CSU-Fresno. We are not sure which would be best, but the rest of the comments assume option 2.
- 5 Page 4-16. 4.4.12. We suggest limiting recreation activity in the RNA. See memo from David Diaz-RO.
- 6 Page 4-70. 4.8.8. Par. 1 Name of RNA. See p.3-17. Standards and Guides are OK except for: 46 these oak guides are inappropriate for SJER which is at a different elevation than most of the Forest--delete; 113 not applicable since we own water rights; 115 not applicable since not public domain; 121 not applicable since no existing rights; 197b omit since we are encouraging housing; 199 delete since building maintenance is CSU-Fresno responsibility; 201 delete since updates specified in coop agreement with Cal. State-Fresno.
- 7 Page 4-73. 4.8.10. Par. 2. Name of RNA. See p.3-17.
- 8 Page 6-3. Research Needs. We assume that the RO has supplied comments based on the Region wide assessment of needs.



FS-6200-28a (5/84)



Draft Environmental Impact Statement

- 9 Page 2-36. 2.5.4.10. Suggest "recreational opportunities will be limited."
- 10 Page 2-37. 2.5.4.12. Suggest "Dispersed nonmotorized recreation will be limited."
- 11 Page 2-40. Table 2.04. Suggest under Recreation Opportunity using the word "limited" for lines 10, 11 and 12. Mineral location and leasing should be "None" for 11. Exp. Range not "Open".
- 12 Page 2-47. 2.6.1.17. Name of Blue Oak-Digger Pine RNA should be San Joaquin Experimental Range RNA.
- 13 Page 2-57. 2.6.2.17. Name of RNA. See p.2-47.
- 14 Page 2-67. 2.6.3.17. Name of RNA. Also pp. 77,87,97,107,117.
- 15 Page 3-116. 3.5.21.2. Name of RNA. Also acreage should be 80 not 70.
- 16 Page 3-117. 3.5.21.4. Suggest changing "designated" to "purchased". Also add to "under the direction of PSW" the statement "in cooperation with California State University at Fresno." Change name of RNA.

This is the some total of our comments though I suspect we probably missed a few things. There are an awful lot of words in the draft documents. If you have any questions please contact Enoch Bell (FTS) 449-3436.

*Ronald E. Stewart*  
for  
ROGER R. BAY  
Station Director



**ltr. 0413**

**UNITED STATES DEPARTMENT OF AGRICULTURE  
PSW**

**RESPONSES:**

1, 2, and 3 The change has been made

4 Option two, making prescriptions conform to existing management plan and co-op agreement with CSUF, is required. The text now conforms to this

5. Since there is very little recreational activity in RNAs, there seems to be little or no significant impact to RNAs. The wording reflects this strategy.

6. The S&Gs you listed do not apply to the San Joaquin Experimental Range or any other experimental facilities.

7. This change has been made.

8. Yes, the Regional Office worked with us.

9, 10, 11, 12, 13, 14, 15, and 16. These changes have been made.



**MADERA COUNTY**  
INDUSTRIAL DEVELOPMENT COMMISSION

209 W Yosemite Ave  
Madera California 93637  
Telephone (209) 675-7768

December 8, 1986

Mr. James L. Boynton  
Sierra National Forest  
1130 "O" Street, Room 3017  
Fresno, California 93721

Dear Mr. Boynton:

1

The primary task of the Madera County Industrial Development Commission is to create and retain employment opportunities for County residents. As such, we are extremely concerned that the reduction in the amount of timber cut in the Sierra National Forest Land and Resource Management Plan would adversely impact the employment level in Madera County.

The timber industry continues to be a dominant employment force in Eastern Madera County. If the "preferred alternative" of the proposed Sierra National Forest Land and Resource Management Plan is adopted, the future of the Sierra Forest Industries Mill in North Fork could be in jeopardy.

We urge you to carefully consider the impact this would have on Madera County residents. The potential loss in jobs, tax base, etc. is important to the economic vitality of our region.

Thank you in advance for your consideration of this matter.

Sincerely,

James E. Taubert  
Executive Director

JET/pt

**MADERA COUNTY INDUSTRIAL DEVELOPMENT COMMISSION**

**RESPONSES:**

Your preference for maintaining job opportunities was considered during our final analysis. There are trade-offs between the higher levels of timber production in Alternatives C and H and the Preferred Alternative including effects on fish, wildlife, soils, water, riparian zones, visual and recreational resources, local employment and local government finances. All of these are described in the EIS and were considered in our analysis.

Your letter and many others stated that current levels of harvest are too low, and if the ASQ was not raised to approximately 160 MMBF, the North Fork Mill could close. Other respondents gave diverse reasons why ASQ under the Preferred Alternative was too high. They claim the budget needed to produce this level of harvest is unrealistically high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvesting on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They request more land be assigned to resources other than timber production.

Timber industry advocates claim the preferred ASQ is insufficient to support mill operations at levels like those favorable conditions experienced in 1986, 1987, and 1988. Should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The impact of increased competition will not spread evenly among the five mills that have been purchasing timber from the Forest. The least competitive mills will reduce operations before those with better locations and more efficient equipment and operations.

The general pattern of mill closures in California indicates that mills located in mountain locations are at a competitive disadvantage to those located in the Central Valley. The highway network allows mills located in the valley to haul logs from a broader supply area than mills located in the mountains. Hauling logs from a larger supply area also allows mills to expand and take advantage of economies of scale.

As competition increases, a mill such as the North Fork mill, rather than the other mills now purchasing the Forest's timber, is more likely to reduce operations. This is a consequence of its mountain location, exclusion from small business set-aside areas available to the Madera and Sacramento mills, and observed inefficient conditions. The Auberry, Dinuba, and North Fork mills are under single ownership, and during periods of market weakness, the owners historically curtail operations at the North Fork mill first. Although an investment in a cogeneration plant makes this mill more cost effective, the mill is still less efficient than the other mills. Cogeneration provides a small edge or cancels the disadvantage of the mill's poor location. Based on the history of this area's mill operations, the Forest would have to provide 137 MMBF ASQ to the local mills in order to provide the North Fork mill with sufficient timber at prices that would allow it to remain competitive.

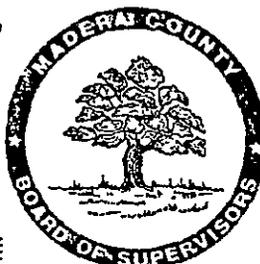
A loss of timber-related employment opportunities in the foothill area is possible over the next 15-25 years even if the Forest could sustain annual harvests in the neighborhood of 150 MMBF. This decline would occur as a consequence of more efficient capacity added to mills in more favorable locations and increased competition from mills outside the traditional market area. Additional information on the regional timber demand status has been added to the final EIS as Appendix L.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for soil, fish, wildlife, riparian zone, and visual quality. Our responsibility is to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.

## BOARD OF SUPERVISORS

## MADERA COUNTY

J. GORDON KENNEDY, District 1  
 ALFRED GINSBURG, District 2  
 GAIL HANHART McINTYRE, District 3  
 JESS LOPEZ, District 4  
 DON DARNELL, District 5



WANDA BRADLEY, Clerk of the Board  
 MADERA COUNTY GOVERNMENT CENTER  
 208 WEST YOSEMITE AVENUE  
 MADERA, CALIFORNIA 93637  
 (209) 675-7700

File No: 86099

Resolution No: 86-415

Tape No: 5-403

Date: December 9, 1986

SIERRA NATIONAL  
 FOREST

DEC 15 1986

ACTION: INFO )

F SUPV  
 D F SUPV  
 AD

NEC

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 RANGE

TR

F.M

ENGR

LANDS

L.M.P

RESOURCES

OTHER

DISTRICTS

REG.

in the Matter of DISCUSSION OF PROPOSED STATEMENT AND RESOLUTION  
 CONCERNING THE SIERRA NATIONAL FOREST LAND AND  
 RESOURCE MANAGEMENT PLAN.

Upon motion of Supervisor Kennedy, seconded by

Supervisor Ginsburg, it is ordered that the attached be and it

is hereby adopted as shown.

I hereby certify that the above order was adopted by the  
 following vote, to wit:

AYES: Supervisors Kennedy, Ginsburg, Lopez and Darnell.

NOES: None.

ABSTAIN: None.

ABSENT: Supervisor Hanhart McIntyre.

Distribution:

County Counsel

Planning

U.S. Forest Service

John Norby

Governor Deukmejian

Senator Alan Cranston

Senator Pete Wilson

Congressman Tony Coelho

Congressman Charles Pashayan

Congressman Richard Lehman

Senator Ken Maddy

Senator Rose Ann Vuich

Senator Walter Stiern

Assemblyman Jim Costa

Assemblyman Bruce Bronzan

Assemblyman Rusty Areias

Assemblyman Bill Jones

Assemblyman Gary Condit

ATTEST: WANDA BRADLEY, CLERK  
 BOARD OF SUPERVISORS

By *Kathy Taylor*  
 Deputy Clerk

DRAFT STATEMENT BY  
MADERA COUNTY SUPERVISORS

The Madera County Board of Supervisors recognizes the importance of balanced programs of multiple-use on our national forests. The Board commends the administration of the Sierra National Forest for its thorough preparation of eight Land Management program alternatives representing a broad range of multiple-use mixes. In doing so, the Board notes that all alternatives are environmentally sound; no alternative constitutes a threat to environmental values.

The Board, therefore, suggests that the economic consequences of various alternatives should be a major factor in the selection of a final alternative. The final alternative should not only provide for a healthy local economy while maintaining maximum flexibility for the future, it should also recognize the responsibility that federal lands have toward meeting regional and national goals.

To both those ends, the Board is concerned that the Preferred Alternative (A) represents a reduction in potential economic ceilings for Madera County. Although the existing plan for timber management allows a sustained harvest of 149.2 million board feet (MMBF) annually, the proposed plan would reduce that amount by 16%, to only 125 MMBF annually. This is being proposed in spite of a long-standing Forest Service policy — a policy which, in fact, tightly governs future timber harvest scheduling — of non-declining yield.

The Board is also concerned that the proposed 10-year timber harvest program is only 80% of the level projected in Alternative A, and only 70% of the currently-approved level.

Although current harvest levels from the Sierra National Forest are below those of the 1970's, several unique economic factors have combined to produce that result. Included in those factors are the residual effects of the economic recession of the early 1980's, the

DRAFT STATEMENT  
Madera County Supervisors  
November 24, 1986  
Page 2

alternate sources of timber supply (Canadian, Southern, and private), a rapidly developing need for the alternative supply sources to reduce production, and the adjustment of manufacturing profiles in the wood products industry. The industrial adjustment is the result of the economic recession. It is not complete and, by its nature, will require time to become complete. Artificial restraints on available raw material will hinder the development of that adjustment and, in the face of the highest-ever regional and national demand for wood products, will do a disservice to California consumers state-wide. Industrial capacity develops in response to opportunity, not vice versa, and Alternative A seems to foreclose economic opportunity. If raw material supplies are available, industrial processing capacity will develop in the form of either new plants or expanded capacity for existing plants. The resulting increase in economic activity, both directly and indirectly is important to Madera County.

California is unique in that 70% of its lumber production is sold within-state. Furthermore, more than half of California's lumber consumption occurs south of Santa Barbara County. Four of the nation's top twenty housing-start areas are in Southern California. California's wood products industry, besides providing basic support to local economies, is also intimately tied to the Southern California economy. Because of its geographic location, the Sierra National Forest is in a good position to respond to Southern California's demands for California wood products. The draft documents recognize the recreational demands placed on the forest by the large urban populations; they do not adequately recognize the concurrent commodity demands and associated opportunities for the timber-producing regions.

DRAFT STATEMENT  
Madera County Supervisors  
November 24, 1986  
Page 3

After reviewing the various alternatives, the Board finds that in nearly every respect Alternative H is economically superior to Alternative A. For example, annual figures in millions of dollars during the plan period are:

	<u>Alt. A</u>	<u>Alt. H</u>
Total benefits	223.0	229.7
Returns to treasury	16.0	21.1
Non-cash benefits	207.0	208.6
Cash flow	( 7.0)	( 5.4)
25% county receipts	4.0	5.3
County yield taxes	0.5	0.6
Employment (M-person years)	4.6	5.2
Discounted benefits	219.8	229.8
Present net value	162.0	163.5

The Board found, also, that the two alternatives compare favorably with respect to "non-commodity" outputs during the plan period. For example:

	<u>Alt. A</u>	<u>Alt. H</u>
Developed recreation	1,705.0 M-RVD	1,705.0 M-RVD
Dispersed recreation	2,095.8 M-RVD	2,095.8 M-RVD
Wilderness use	462.8 M-RVD	462.8 M-RVD
Wildlife & fish user days	495.6 M-WFUD	438.0 M-WFUD
Grazing	38.0 M-AUM	40.0 M-AUM
Timber -	125.2 MMBF	160.0 MMBF
Fuelwood	22.5 M cords	22.5 M cords

DRAFT STATEMENT  
Madera County Supervisors  
November 24, 1986  
Page 4

Alt. A - Cont'd    Alt. H - Cont'd

Water -		
ac. ft. @ quality	2.586 M	2.597 M
increased qty.	0.039 MM ac.ft.	0.044 MM ac.ft.
watershed improvement	226 ac/yr	226 ac/yr
Area burned-wildfire	2,163 acres	2,082 acres
Wildlife -		
bald eagles	5-10	5-10
peregrine falcon	3	3
deer	18.4 M	13.1 M
spotted owls	108 pr.	107 pr.
goshawk	60 pr.	60 pr.
Lahontan trout	2 pops.	2 pops.
Paiute trout	2 pops.	2 pops.
resident fish	90 M-lbs.	90 M-lbs.

The Board notes that the "commodity" outputs (timber, fuelwood, water, grazing) on the list are the only ones, except for deer, with significant variations. In each "commodity" case, Alternative H is superior. Of the alternatives that reduce deer carrying capacity, Alternative H produces the least reduction.

**1** In view of the similarity between the non-commodity resource outputs of Alternatives A and H, and the superior economic consequences and opportunities of Alternative H, the Madera County Board of Supervisors supports the adoption of Alternative H as the management direction for the Sierra National Forest during the coming plan period.

###

RESOLUTION NO. 86-415

1           WHEREAS, the Sierra National Forest has produced draft  
2 alternatives of its Land and Resource Management Plan for the  
3 next 10-15 years, and

4           WHEREAS, all alternatives protect environmental values, and

5           WHEREAS, the economic programs of the Sierra National Forest  
6 are important to the economy of Madera County as well as to the  
7 economy of California at large, and

8           WHEREAS, the proposed alternative forecloses certain  
9 economic opportunities for the future, and

10           WHEREAS, projected non-commodity resource outputs vary  
11 insignificantly between alternatives A and H, and

12           WHEREAS, alternative H provides a more favorable economic  
13 outlook for Madera County;

14           NOW, THEREFORE BE IT RESOLVED that the Madera County Board  
15 of Supervisors supports expanded economic considerations in the  
16 planning of national forest activities.

17           BE IT FURTHER RESOLVED that, for the coming 10-15 year plan  
18 period, the Madera County Board of Supervisors favors Alternative  
19 H as the alternative of choice.

20           The foregoing was adopted this 9th day of December, 1986, by  
21 the following vote:

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Supervisor Kennedy voted:

Yes

Supervisor Ginsburg voted:

Yes

Supervisor Hanhart McIntyre voted:

Absent

Supervisor Lopez voted:

Yes

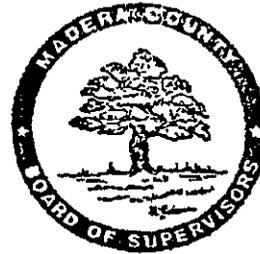
Supervisor Darnell voted:

Yes

Don Darnell  
Chairman, Board of Supervisors

ATTEST:

Wanda Bradley  
Clerk, Board of Supervisors



**MADERA COUNTY BOARD OF SUPERVISORS**

**RESPONSES:**

Thank you for responding to our Draft LMP. As you noted, the ten year Action Plan was not correct. This has been corrected in Appendix C in the Plan.

Your preference for Alternative H was considered during our final analysis. There are trade-offs between the higher timber production and economic advantages of Alternative C and H and the Preferred Alternative. These trade-offs include effects on fish, wildlife, soils, water, riparian zones, visual and recreational resources, local employment and local government finances. All of these are described in the EIS and were considered in our analysis

Your letter and many others stated that current levels of harvest are too low, and if the ASQ was not raised to 160 MMBF, employment and revenues in Madera County would decline.

Other respondents gave diverse reasons why ASQ under the Preferred Alternative was too high. They claim the budget needed to produce this level of harvest is unrealistically

high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvest on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They request more land be assigned to resources other than timber production.

Timber industry advocates claim this amount is insufficient to support mill operations at levels like those favorable conditions experienced in 1986, 1987, and 1988. Should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for soil, fish, wildlife, riparian zone, and visual quality. Our responsibility is to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.

December 10, 1986

Mr. James L. Boynton  
Forest Supervisor  
Sierra National Forest  
1130 "O" Street  
Fresno, CA 93721

Dear Mr. Boynton:

The Fresno County Recreation and Wildlife Commission has received your proposed forest plan and draft environmental statement. It is the duty of the Fresno County Recreation and Wildlife Commission to study any proposals that will affect recreational opportunities or wildlife and to make recommendations to the Fresno County Board of Supervisors.

It was quite obvious that any actions in the Sierra Forest would, directly or indirectly, affect recreation or wildlife. Therefore, our comments will cover all aspects of your proposed plan. First we wish to take this opportunity to compliment your staff on the vast amount of data that has been accumulated and the manner in which the draft EIS and the proposed Forest Land and Resource Management Plan was prepared. We were favorably impressed by the scope of concerns covered in the Management Standards and Guidelines section of the "Proposed Plan."

Our remarks will cover some of the concerns which we felt were not adequately covered and we respectfully request that your Land Management Planning staff give them sincere consideration before drafting the final Land Management Plan.

Recreation:

1. We do not feel that your goal of rehabilitating the trails by 2010 is acceptable. We hear many complaints that the trail maintenance and conditions of trails on the Sierra Forest are bad. We urge that additional funding and efforts should go into correcting the problem long before 2010.
2. We feel that additional parking areas and facilities should be provided at "trail-head" locations where livestock users can park their vehicles and trailers with facilities for loading, unloading, and caring for pack stock.
3. We feel the forest should provide for a wide variety of camping facilities from single campsites to small unimproved areas, with no facilities, on up to the campgrounds in the popular lake-oriented recreational areas that may have flush toilets and shower facilities.

Mr. James L. Boynton  
December 10, 1986  
Page Two

4. We do not feel that in the establishment of the National Forest system, it was ever the intent that visitors to our National Forest should have to pay for the privilege.
3. 5. We do accept that those staying in the improved campgrounds should pay a reasonable fee for the clean up and maintenance of those facilities.
6. We feel that where roads parallel streams, parking spaces should be provided for people who desire to fish, picnic, or just enjoy the area.
5. 7. We have also been informed that the trail signs along Sierra Forest Trails are in poor repair and far from adequate.
8. We also wish to note that there is a definite lack of camping facilities for groups, i.e., church groups, 4-H groups, etc.
9. We feel that additional development should take place in the lower elevation year-round trails in Management Area 5.
10. We feel that trails should be open during and after logging operations and, where necessary, reconstructed to safe standards.

Wilderness:

6. 1. The current wilderness permit system is not adequate to protect the resources and creates a hardship for people desiring to visit the wilderness areas of the forest. Trail head daily quotas do little to control the number of people who may impact a particular lake or area. The necessity (in many cases) of having to appear at a Ranger Station to obtain a permit can cause the loss of valuable travel time.
2. We strongly recommend that the wilderness permit system be revised to provide needed resource protection or the present permit system be discontinued.
3. Trail maintenance and trail signs are not adequate to provide for safe use by the public.

Fish and Wildlife:

7. 1. We did not feel that sufficient consideration was given to fisheries. The Lahontan Trout protection and overdrifting of streams were covered but other habitat maintenance or enhancement seems to be left to coordination with other management practices.
2. We feel that fishery habitat enhancement goals should be included in the plan.

Mr. James L. Boynton  
December 10, 1986  
Page Three

- 8 3. Any development plans submitted to the Forest Service for approval must include provisions that will ensure that fish-wildlife habitat and sensitive plant resources will be maintained at pre-project levels.
- 9 4. Chaparral conversion projects such as Jose Basin must be designed in a mosaic pattern that will enhance habitat for wildlife as well as cattle. Browse ways and plots of herbaceous forage must be left in the conversion area.
- 10 5. Deer fawning areas should be excluded from livestock grazing permits and key areas should be fenced to retain cover for fawns.
- 11 6. We feel that five per cent of clear cuts should be left to regenerate in a natural condition to provide wildlife habitat.
- 12 7. The construction of a specific number of water retention ponds for use by cattle and wildlife should be an annual goal of the plan.
- 13 8. Current levels of oaks should be maintained for the benefit of the 80 to 90 species of wildlife who are dependent on oaks.

Riparian Areas:

- 14 1. Many riparian areas in the Sierra Forest are in poor condition. The management goals should specify a precise number (or acres) of meadows that will be rehabilitated each year. There should also be a stated plan for stream bank rehabilitation.
- 15 2. Meadows that are being encroached upon by Lodgepole Pines should be designated as sites for harvesting of fuel wood. The removal of Lodgepole Pines will be beneficial to the meadow and fill a current need for fuel wood by the general public.
- 16 3. Volunteer help should be solicited for meadow enhancement projects.
- 17 4. No permit for any type of commercial development should be approved that does not provide more riparian habitat than exists at the time of the permit application.
- 18 5. No Meadow Management Plans (such as the Sequoia Park Plan) should be approved without consideration of the desires and needs of the users and the general public.

Range:

- 19 1. We do not favor increasing the cattle animal unit months (AUM) on the Sierra Forest to 44,000 AUM's per year. The current grazing program is not paying the management cost necessary to supervise the program.

Mr. James L. Boynton  
December 10, 1986  
Page Four

- 20** 2. We do favor chaparral conversions for cattle when they are designed to also provide the maximum benefits for wildlife.
- 21** 3. We would favor a program to phase out all cattle allotments in the wilderness areas. Many are no longer used and the present costs of transporting cattle (liability insurance) has become so expensive that it is no longer a cost-effective means of raising cattle.
- 22** 4. We feel a plan to reduce cattle grazing in key deer fawning areas is urgently needed. High grass cover is needed to protect new fawns from the many predators who prey on them.

Timber:

- 23** 1. We fail to understand how you plan (as mandated by Federal law) to maintain the biological diversity of the forest when the plan specifies the use of clear-cut methods for seventy per cent of the timber producing area and only one plant or species of tree is to be allowed to grow in the cut-over areas.
2. We feel that a 50 year over-view map is needed that shows what areas of the forest are planned for clear cuts, shelter wood cuts, selective cutting and what areas will be left in their natural condition.
- 24** 3. We have some serious doubts about your ability to maintain the fertility of the forest soils when thousands of tons of fibre (timber) are continually planned for removal. The farmers can't continue to take from the soil and we don't think the Forest Service can either.
4. For the same reason, we are strongly opposed to the use of forest products to fuel energy-biomass plants. We feel that all possible timber by-products should be returned to the soil.
5. Since clear-cuts are responsible for accelerated erosion and the loss of valuable topsoil, we recommend that only a limited amount of the logging slash and debris be piled and burned and that large amounts of small limbs be left in the soil to help retain water and lessen the damage from erosion.
6. We are quite concerned about the fire danger from large stands of even-age timber. The likelihood of "crown fires" and the hazard of gaining access to the fire zone seem to warrant considerable planning.
- 25** 7. We feel that five per cent of all clear cuts should be managed for wildlife. The continued checkerboard of clear cuts will eventually make a wildlife desert of large portions of the forest.

Mr. James L. Boynton  
December 10, 1986  
Page Five

- 26 8. You state that lower elevation oak stands will be maintained at current densities. How can you accomplish this goal without a plan for oak rejuvenation? A definite plan of oak rejuvenation should be included in the preferred plan.
- 27 9. We saw no plan for the use or the conversion of the large stands of Tamarak (Lodgepole Pine). Utilization of this resource should be included in the preferred plan.
- 28 10. We feel that further consideration should be given to paragraph 2, page 3-62 (DEIS) which states: "Mixed conifer stands, with their multi-layered canopy, suggests the maintenance of high growth rates with uneven age methods. Specialists in other resource disciplines suggest the use of this method as a solution to the negative effects of even age clear-cutting and shelter wood practices."
- 29 11. Trails should be open during and after logging operations and reconstructed to safe standards.

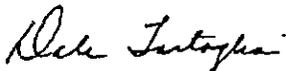
Hydro-Projects:

1. We feel that all hydro-electric proponents should be required to provide a complete EIS and pay all costs for analysis by the U. S. Forest Service and the California Department of Fish and Game.
- 30 2. All new and relicensing hydro-electric proponents should be required to provide a complete EIS and pay all costs for analysis by the U. S. Forest Service and the California Department of Fish and Game.
2. All new and relicensing hydro-projects must provide benefits to the forest and full mitigation for any environmental damage. Mitigation must be considered a direct project cost. Riparian and wildlife losses can no longer be condoned.

Again, may we compliment your staff for the job done in presenting the forest-wide goals and objectives and the goals and guidelines applicable to the individual management areas. We feel that your proposed Forest Land and Resource Management Plan comes closer to meeting the needs of the future than any forest plan we have previously studied.

Thanks again for the opportunity to review this important management document.

Sincerely,



Dale Tartaglia, Chairman  
Fresno County Recreation and  
Wildlife Commission

DT:HD:icm/6696a

**FRESNO COUNTY PARKS DIVISION  
Recreation & Wildlife Commission**

**RESPONSES:**

1. Trail rehabilitation will somewhat depend on appropriations from Congress. The year 2010 is our best estimate for the time of completion. Forest crews and volunteers may complete this work ahead of schedule

2. Additional facilities have recently been completed at Mono trailhead and Maxon Dome. Both facilities are designed to accommodate hikers and equestrians. Additional trailheads are planned for several locations and will be constructed as funding becomes available

3. The Forest provides a wide variety of camping facilities and experiences, but Forest Service policy has not provided showers. This does, however, appear to be changing, and future facilities may include showers. The Forest feels there are already many places along most roads for forest visitors to park while enjoying hiking, fishing, or other activities

4. Visitors do not pay to visit a National Forest, unless staying within an improved campground

5. Trail signs and trail maintenance depends on Congressional funding. There have been severe cutbacks during the past several years. Trail work is gaining special emphasis in Congress and appropriations are increasing. Several group campgrounds were completed in 1987. The Forest Service shares your concern on group camping. This topic will be addressed in future recreation management plans.

6. The Forest agrees that heavy wilderness use around the trail access systems is making it hard to protect the resources. Since 1970, some controls and limits on group size and length of stay have been implemented. The Preferred Alternative will indicate that in the most congested areas, further supervision and control of visitors may be needed to mitigate or eliminate site damage and unsanitary conditions. The wilderness permit system will be analyzed at a project level to ascertain if improvements can be made

7. The S&Gs were developed to reduce negative impacts to the various resources of the Forest. These S&Gs, BMPS, and appropriate mitigation measures, are expected to prevent or minimize negative impacts to the fisheries' resource. In Chapter 4.0 of the Plan, there is a description of our intent to complete annual fishery habitat improvements. Aside from using appropriated funds and K-V funds, the Forest actively tries to find money from non-federal sources. Fishery habitat improvement funding has exceeded \$100,000 each year for the past several years. These funds are expected to increase substantially.

8. The Forest Plan described fisheries management objectives for hydroelectric development projects in S&Gs in Chapter 4. On a case-by-case basis, the proposed hydroelectric power projects are analyzed in close coordination with CDFG and managed to meet Forest objectives.

9. The recommended chaparral management program will provide a balance of age class diversity and distribution, and is designed to provide benefits for fire management, grazing, recreation access, and enhancement of wildlife habitat. Permanent type conversions on ridgetops and prescribed burns are management tools to achieve these goals

10. Cattle grazing seasons are adjusted to allow deer to use mountain meadows during most of the fawning season. Fence construction and maintenance costs for fencing all key areas would be prohibitive. However, if cooperative funding becomes available there may be some key deer areas where fencing would be appropriate.

11. By law, the Forest is directed to reforest harvested areas to a viable stocking level within five years. Vegetation, other than conifers, generally becomes established, and provides wildlife habitat until maturation of the conifers. Many clearcuts have clumps of small trees left in them. These clumps often make up 25-50% of the unit. Except for thinning, these clumps are left to grow naturally

12. Current structural standards make pond construction prohibitive. Ponds will be constructed as the opportunity and funding arises.

13. The S&G concerning oak retention is a balance between maintaining the needs for wildlife and the needs for other uses of this hardwood resource. Our S&Gs will meet the needs of all oak-dependent species.

14. The Preferred Alternative includes 226 acres/year of watershed improvement projects. Many of these projects will involve meadow rehabilitation. Additional S&Gs have been added to the final Plan, strengthening stream bank protection and rehabilitation. Thank you for pointing out the need to provide additional protection

15. This is a common practice in the Forest. Strange as it may seem, the Forest has not been successful in obtaining low bids for this work. Any assistance provided would be appreciated

16. This is also a common practice in the Forest. Additional partnerships will be formed during the life of the Plan. Challenge grants will also be used, whereby the Forest Service and groups or agencies combine staff and funding to accomplish this work.

17. The normal practice is to require replacement of equivalent riparian habitat. Requiring more is outside of our authority

18. This will be accomplished through project environmental assessments.

19. The increase in grazing in the Preferred Alternative to approximately 41,000 AUMs/year is based on range management principles. This does not solely mean an increase in livestock numbers, but a combination of adjustments of season and numbers. The increase will be in the lower elevation zones. The funds for managing the grazing program is decided by Congress and is not tied to income from grazing permits.

20 The Forest favors chaparral management as well. The recommended program reflects a balanced plan of what is believed can be done within the limitations of available staff, expected funding, and resolution of resource conflicts. The intent is to provide a balanced diversity of age classes, fuel reduction for fire protection, enhanced wildlife habitat, increased forage for grazing, and enhanced recreation access.

21. Elimination or phasing out cattle grazing in wilderness areas is outside the authority of the Forest Service and this Plan

22 Cattle grazing seasons are adjusted to allow deer to use mountain meadows during most of the fawning season. Dense brush thickets and conifer stands also provide essential hiding and thermal cover for fawns.

23 Clearcuts are often planted with at least two tree species. Natural seeding occurs from trees, brush, and forbs from adjacent area which combine with planted species. The potential loss of diversity when using uneven-aged harvest methods can be reduced by planting all appropriate species, or by designating appropriate combinations of species as seed trees or shelterwood trees.

24 S&G 112 in the Draft Plan requires that a minimum of 50% ground cover be maintained to protect soil productivity and minimize erosion. This ground cover consists of fine twigs, branches and needles. Generally, the large woody material contains a small percentage of the site's nutrients. A limited amount of large debris is needed for maintenance of micro-organisms and wildlife. This should be met by leaving three downlogs/acre.

25. Clearcuts will improve the habitat for wildlife species dependent on early and mid-succession seral stages and detract from the habitat for species dependent on later stages. Since the Forest will be a mosaic of clearcuts, partially cut areas, undisturbed areas, and wilderness, there will be diversity and transition types of wildlife habitats that will benefit all species.

26. The scope of this Plan does not include a detailed front country oak retention plan. Numerous research groups are studying blue oak regeneration. Information from these studies may determine if there is a need to monitor blue oak during the life of the Plan.

27. Lodgepole pine is part of the Forest's capable and suitable timber base. It will be utilized.

28 This paragraph has been rewritten.

29. Trails are only closed when there is a safety hazard. If damage occurs during timber harvesting, the logger is required to reconstruct them to at least the standard that existed prior to logging.

30. An EIS is required only when the projects are considered to have significant effects on the human environment. To make this determination, an EA is prepared at the request of or by the Forest Service using the applicant's information. This information is reviewed by a Forest Service ID team to determine if it is valid. Typically, the EA is prepared by consultants who work for many developers and who would not be in business if misrepresentations occurred. There are bad consultants, but these can be found by the review process. The Forest Service is not required to accept information if valid reasons are known that suggest that there are tainted operating funds derived from hydroelectric power generation.

The Forest Service is attempting to recover money from applicants for the cost of processing their applications. The Forest Service is considering a requirement that adds this to the hydroelectric development guidelines in the Plan. Many of your comments concerning mitigation are presently in the hydroelectric development guidelines.



COMMITTEES-  
Aging & Long Term Care  
Agriculture  
Labor & Employment  
Public Investments,  
Finance & Bonded  
Indebtedness

Rural Caucus

Joint Committee Refugee,  
Resettlement, and  
Immigration

# Assembly California Legislature

BILL JONES

ASSEMBLYMAN, THIRTY-SECOND DISTRICT

CHAIRMAN

ASSEMBLY RURAL CAUCUS

VICE CHAIRMAN

ASSEMBLY LABOR & EMPLOYMENT COMMITTEE

January 7, 1986

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FROM Porterville, Dinuba, Exeter  
Three Rivers and Springville  
ENTERPRISE 18463

Mr. James L. Boynton  
Forest Supervisor  
Sierra National Forest  
1130 O St., Room 3017  
Fresno, CA 93721

Dear Mr. Boynton:

Please accept this letter as my comment on the proposed management plan for the Sierra National Forest.

I am, of course, concerned about the potential economic impact on Madera County as a whole and on North Fork in particular. A reduction in the allowable harvest below 150 million board feet per year could result in the closure of the sawmill in North Fork. As I am sure you are aware, the sawmill is the major industry and major employer in that area.

1

The Preferred Alternative (A) represents a potential reduction of Madera County's economic ceiling. Like many other small rural counties, Madera County is already battling decreasing income at a time when the demand for services is greater than ever.

With the realization that all of the alternatives were prepared with ecological considerations in mind, I support the Market Alternative which would put the allowable cut at 160 million board feet per year. Since the long term sustained yield of the Forest is close to 190 million board feet per year, this appears to be a workable compromise between sustaining a vital industry and efficient management of our natural resources.

Thank you for your consideration of this letter.

Sincerely,

Bill Jones

**BILL JONES**  
Assemblyman, Thirty-Second District

**RESPONSE:**

Your preference for Alternative H and the continued operation of the North Fork Mill was considered during our final analysis. There are trade-offs between the higher levels of timber production in Alternatives C and H and the Preferred Alternative. These trade-offs include effects on fish, wildlife, soils, water, riparian zones, visual and recreational resources, local employment and local government finances. All of these are described in the EIS and were considered in our analysis.

Your letter and many others stated that current levels of harvest are too low, and if the ASQ was not raised to approximately 160 MMBF, employment and revenues to Madera County would decline and the North Fork mill would close.

Other respondents gave diverse reasons why ASQ under the Preferred Alternative was too high. They claim the budget needed to produce this level of harvest is unrealistically high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvesting on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They request more land be assigned to resources other than timber production.

Timber industry advocates claim this amount is insufficient to support mill operations at levels like those favorable conditions experienced in 1986, 1987, and 1988. Should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The impact of increased competition will not spread evenly among the five mills that have been purchasing timber from the Forest. The least competitive mills will reduce operations before those with better locations and more efficient equipment and operations.

The general pattern of mill closures in California indicates that mills located in mountain locations are at a competitive disadvantage to those located in the Central Valley. The highway network allows mills located in the valley to haul logs from a broader supply area than mills located in the mountains. Hauling logs from a larger supply area also allows mills to expand and take advantage of economies of scale.

As competition increases, a mill such as the North Fork mill, rather than the other mills now purchasing the Forest's timber, is more likely to reduce operations. This is a consequence of its mountain location and exclusion from small business set-aside areas available to the Madera and Sacramento mills. The Auberry, Dinuba, and North Fork mills are under single ownership, and during periods of market weakness, the owners historically have curtailed operations at the North Fork mill first. Although an investment in a cogeneration plant makes this mill more cost effective, the mill is still less efficient than the other mills. Cogeneration provides a small edge or cancels the disadvantage of the mill's poor location. Based on the history of this area's mill operations, the Forest would have to provide 137 MMBF ASQ to the local mills in order to provide the North Fork mill with sufficient timber at prices that would allow it to remain competitive.

A loss of timber-related employment opportunities in the foothill area is possible over the next 15-25 years even if the Forest could sustain annual harvests in the neighborhood of 150 MMBF. This decline would occur as a consequence of more efficient capacity added to mills in more favorable locations and increased competition from mills outside the traditional market area. Additional information on the regional timber demand status has been added to the final EIS as Appendix L.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for soil, fish, wildlife, riparian zone, and visual quality. Our responsibility is to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
CALIFORNIA STATE OFFICE  
2800 Cottage Way  
Sacramento, California 95825

IN REPLY REFER TO  
I797  
CA-930.12

JAN 8 1987

Zane Smith, Jr.  
Regional Forester  
US Forest Service  
630 Sansome Street  
San Francisco, CA 94111

Dear Mr. Smith:

We have reviewed the Sierra Forest draft plan and EIS and offer the following comments and suggestions. Our concerns are focused on the treatment of mineral resources and are included in the official Department of Interior response.

#### Specific Comments EIS

- 1 Page 2-45 (2.6.1.13): The text addresses mineral withdrawals within the Plan area. Which areas are being addressed and where are they located? Need to have a map(s) which identifies those areas which are currently W/D from mineral entry and those areas which are proposed under each alternative.
- 2 Page 2-125 (2.7.11): The text states that Alternatives A, C, F and H will recommend the withdrawal of an additional 1,140. Similarly, it states that Alternative D and E will withdraw an additional 26,238 and 11,310 acres, respectively. These should be clearly identified on a map.
- 3 Page 3-2 (4th paragraph): Text states that about 180 reported mineral deposits of potential economic value occur within the Forest. A few are being explored or are in production. The questions are: (1) Where are these deposits located? (2) Which mineral are known or suspected to occur at these deposits? (3) Where is exploration/production presently occurring? (4) Will the proposed Alternatives have any affect on this activity? What is the source for mineral deposit information? A map should be provided showing the relative number of claims in given areas within the Plan boundaries.
- 4 Along these same lines, are there any mineral leases (e.g., oil and gas, geothermal) within the Plan area? If so, where are they located? The 1983 edition of "Technical Map of the Geothermal Resources of California" by the

California Division of Mines and Geology shows three known thermal springs within the Plan area but no mention is made of the springs or the geothermal potential.

**5** Page 3-97 (3.5.16.1, 2nd paragraph): The California Division of Mines and Geology map mentioned above shows over one-fourth of the Plan area to be favorable for geothermal resources. The Plan should be more specific on this issue.

Page 3-99 (3.5.16.1): The Multiple Use Mining Act should be briefly explained.

**6** The statement "Where mining has the legal right to develop..." suggests that the permitting-authorization of development of locatable minerals is discretionary; this is not true.

**7** Page 3-99 (3.5.16.2, 2nd paragraph): The text states "Little information exists about the quantity at any mineral resources in the Forest." If so, then what is the source of information presented in figure 3.04 on page 3-101. The term "mineral potential" as used by the FS should be defined.

**8** Page 3-99 (3.5.16.2, 3rd paragraph): Which maps (titles, dates) from CDMG, USBM and USGS were used during the Plan preparation? Are they in the references?

**9** Page 3-101 (Figure 3.04): Mineral Potential. The criteria to establish "very high-low" potentials should be defined. Since there appears to be little geologic data on mineral resources, why weren't any areas listed as unknown potential?

**10** Page 3-103 (3.5.17.2): If any of the "occupancy trespass" structures are on existing mining claims the status of the mineral exploration/development would help define the situation.

**11** Page 7-201-203 (Table L.01): The locations of deposits such as Sanbornite and others if known, should be represented on a mineral map of the Plan area. This map could also include the location of the claims listed on Table L.02.

#### Specific Comments - Plan

Page 3-13 (3.15): The "180 reported deposits and/or prospects containing minerals of potential economic value" which occur within the Plan area should be represented on an individual geological and mineral prospect (etc.) map.

Again, the document should show which areas are closed to mineral entry and mineral leasing under each alternative.

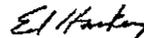
**12** Page 4-31 (4.5.2.11): Prescription #122: If a claim has valid existing rights (VER) in a withdrawn area, the operator does not have to conform to the purpose of the withdrawal as long as he remains on the claims. This should be worded to reflect recognition of VER.

13

Prescription #134: No leasable minerals such as oil, gas, etc., are known to exist in the Plan area but the potential, if any, should be specified. The geothermal area referred to should be represented on a mineral status map.

We appreciate the opportunity to review and comment on these documents.

Sincerely,



Ed Haste  
State Director

cc:  
DM, Bakersfield  
WO (760), 909 Premier Bldg.

Itr. 1440

**UNITED STATES DEPARTMENT OF THE INTERIOR  
Bureau of Land Management**

**RESPONSES:**

1 and 2 A withdrawal map and a table that shows the acres withdrawn by type have been developed and included in the final EIS.

3. The source of mineral deposit information was the Bureau of Mines/Mineral Industry Location (MILS) This information was part of the data used to develop the Mineral Potential Map. Some data requested are not necessary to present in the Plan. Interested parties can find the data in MILS.

4. There are currently no mineral leases within the area covered by the Plan. The Plan has been modified to reflect the geothermal potential of the three springs.

5. The second paragraph in this section has been modified to clarify the geothermal situation. The Multiple Use Mining Act is briefly explained in 3.5 15.1 of the Final Plan.

6. This paragraph has been rewritten.

7 The text has been clarified Mineral potential has been defined, and the method for determination has been described. There is limited information available about the Forest's land base.

8 The maps are now listed in the reference section.

9. The criteria to establish high/low potentials are now defined The maps in the the Plan did not have "unknown" potential as a criteria.

10 The "occupancy trespass" refers to land survey, not minerals.

11. This level of detail was not provided in this planning effort because public input did not indicate sufficient concern or interest in minerals. Forest district files contain this information.

12. The S&G has been clarified in the Final Plan.

13 The S&G has been clarified in the Final Plan. Areas of geothermal potential will not be included on the mineral status map. Locations can be found on maps in our files.



## United States Department of the Interior

OFFICE OF ENVIRONMENTAL PROJECT REVIEW  
 BOX 36098, 450 GOLDEN GATE AVENUE  
 SAN FRANCISCO, CALIFORNIA 94102



January 9, 1987

ER86/1235

James L. Boynton, Supervisor  
 Sierra National Forest  
 Federal Bldg., Room 3017  
 1130 "O" Street  
 Fresno, CA 93721

Dear Mr. Boynton:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) and the Proposed Land and Resource Management Plan (Plan) for the Sierra National Forest, California and offers the following comments.

### Water Quality

1

Lack of adequate sanitation facilities is reportedly a common problem in the National Forest. The possibility of effects of this problem on ground-water supplies for the visiting public and staff should be assessed, and mitigation of ground-water contamination should be discussed, if appropriate. Requests for the use of Forest lands for disposal of sewage effluent and for community water-supply systems are discussed. The statement should address water-related effects of such uses of the Forest.

It is not clear whether the Forest will be utilized to receive miscellaneous solid wastes or provide sanitary landfill capability for surrounding communities. If appropriate, the statement should discuss potential impacts of such use(s) and indicate required monitoring or other mitigation. Monitoring requirements and practices for drinking water supplies for visitors and staff should be included in Table 5.01, which describes other monitoring and evaluation requirements.

Plans for the investigation of the ground-water pollution potential and the impact of surface-water runoff from the abandoned barite mine should be included.

### Fish and Wildlife

2

The listed species that occur in the Sierra National Forest include the bald eagle (Haliaeetus leucocephalus), Paiute cutthroat trout (Salmo calrki seleniris), and the Lahontan cutthroat trout (Salmo clarki henshawi). The Sierra National Forest provides habitat for the American peregrine falcon (Falco peregrinus anatum) although none are currently known to nest there. Sixteen candidate plants also occur in the Sierra National Forest.

We have not critically reviewed the methodologies that have been used in other technical areas of the plan (recreation, timber, ranges, etc.) to ascertain whether they are consistent with the plan's assumptions for threatened and endangered species. However, we have reviewed the models and data bases that have been used for fish and wildlife and we have serious reservations about whether they are adequate to provide valid projections on probable impacts to fish and wildlife resources in general and threatened and endangered species in particular.

Generally, we believe that the resolution of issues involving listed species is best achieved through the normal Section 7 consultation process on a project-by-project basis when more specific information is available concerning potential project impacts. Therefore, we recommend that the Forest Service initiate formal consultation on those components of the selected alternative that may adversely affect listed species at the time such projects appear on your planning horizon.

**3** With respect to recovery actions, we recommend that Plan be made consistent with the recovery plans that have been developed for the listed species that now occur, or historically occurred, in the Sierra National Forest. For the two threatened trouts, in particular, there is little, if any, guidance given on how the Forest Service plans to implement the recovery tasks identified in the management and recovery plans that have been developed for these threatened fishes.

**4** With respect to candidate species, the proposed plan contains little guidance on how the Forest Service will manage the Forest to insure that such candidates do not become threatened or endangered. The importance of the sensitive plants of the Sierra National Forest, all of which are Federal candidate species (50 FR 39525-39584), cannot be overstated. *Carpenteria californica*, one of two members of the Hydrangeaceae in California (Cronquist 1981), is a monotypic genus and paleoendemic with no close relatives (Raven and Axelrod 1978). Similarly, Rawson's flaming-trumpet (*Collomia rawsoniana*) the subject of an interagency agreement with the Forest Service and Fish and Wildlife Service, too is a paleoendemic with its closest relative growing near Crater Lake, Oregon (Grant 1959). The Merced River clarkia (*Clarkia lingulata*), the topic of much study regarding its evolutionary biology (Lewis 1955, 1961, and 1962; Lewis and Lewis 1952; Lewis and Roberts 1956), inhabits only Forest Service land along the Merced River. Other plants, like High Sierra evening-primrose (*Camissonia sierrae*, subsp. *alticola*) and parasol clover (*Trifolium bolanderi*), grow only or chiefly within the borders of the Sierra National Forest.

The management of these significant plants, therefore, should be fully addressed in the Forest plan. Sensitive plants currently are mentioned as an afterthought or in passing with no discussion of proposed management. Absent this discussion of sensitive or candidate plants, mismanagement may occur resulting in the need to Federally list these plants by the Fish and Wildlife Service.

- 5 Before the Forest Service commits itself to a plan that has enormous potential to drastically alter habitat conditions for several candidate and listed threatened and endangered species we recommend that a commitment first be made to obtaining the needed baseline data and validating the models that are used to evaluate fish and wildlife impacts. In situations where there is already good documentation to show that a listed or candidate species is currently in a declining or depleted status, land uses that would exacerbate the situation should be avoided until recovery is well underway.

Specific Comments

Plan

3.7 - Fishery Resources

- 6 The Plan states that the objective in managing the two threatened trout species is to avoid pushing them into an endangered status. Recovery plans have been developed for both of these trouts that have as their objectives complete recovery and delisting. The objectives in the proposed plan relative to the management of Paiute cutthroat trout and Lahontan cutthroat trout should be made consistent with the objectives in the recovery plans for these fishes.

3.10 - Sensitive Plants

- 7 The DEIS mentions 16 sensitive plants (page v) yet only 15 are listed on page 3-10. Although generally Forest management does not adversely affect sensitive plants, conflicts have occurred and likely will continue with five plant taxa, including the briefly discussed Rawson's flaming-trumpet (Collomia rawsoniana), which also are Federal candidate species. The proposed construction of an electric transmission line for the Vermilion Powerhouse Project (FERC No. 2086) will adversely affect, albeit insignificantly with the proposed mitigation measures, the High Sierra evening-primrose (Gamissonia sierrae subsp. alticola). Ongoing type or brush conversion projects near Sugarloaf Mountain likely impact carpenteria (Carpenteria californica), while proposed hydroelectric projects along the Merced River may result in the extinction of the Merced River clarkia (Clarkia lingulata). Grazing practices within certain meadows on the Minerets District may affect to some degree the distribution and density of parasol clover (Trifolium bolanderi). Although variously affecting sensitive plants, Forest management can conflict with the conservation of these five plants.

- 8 The discussion of the Interagency Agreement (not conservation agreement as indicated on page 3-10) should be elaborated here and throughout other portions of the plan and EIS. The Interagency Agreement signed on January 15, 1985, affects Forest management within the range of the species, especially its designated essential habitat. The plan should mention the Forest's forthcoming management plan for Collomia and past conflicts resolved via the cooperation and coordination between the

Forest Service and Fish and Wildlife Service under the terms of the Interagency Agreement.

#### 4.2 - Forestwide Goals and Objectives

**9** Goal (or objective?) #3 should be rewritten to include plants as follows:

"Manage fish, wildlife, and plant habitats to maintain viable populations of all resident or indigenous fish, wildlife, and plant species."

#### 4.3.8 - Fish, Wildlife, and Sensitive Plants

**10** Although we agree on the need for additional floristic surveys and sensitive plant monitoring, the plan should provide detailed management-species studies needed to resolve potential future conflicts. Moreover, this section fails to discuss that the Forest will coordinate with the Fish and Wildlife Service on hydroelectric projects affecting Rawson's flaming-trumpet, as per the Interagency Agreement.

#### 4.5.2.5 - Fish and Wildlife

**11** Aside from the failure to include plants in the title (change to "Fish, Wildlife, and Sensitive Plants"), this management standards and guidelines section does not mention the approved Interagency Agreement or forthcoming management plan. In addition, this section should include precise goals for each sensitive plant or at least a detailed plan (including timetable) describing actions (i.e., experimental studies) necessary for the development of these goals.

**12** Of concern also, #32 states that "sensitive, threatened, endangered, and harvest species" will be accorded a "slightly greater emphasis." However, the Endangered Species Act requires the Forest Service not to undertake any actions, including the enhancement of harvest species, jeopardizing the continued existence of threatened or endangered species.

#### 4.5.2.6 - Riparian

**13** This section should mention restrictions on riparian areas (i.e., 300' corridors with Collomia rawsoniana essential habitat) embodied in the Interagency Agreement for Rawson's flaming-trumpet.

#### 4.5.2.13 - Hydroelectric Development

**14** As discussed above, this section should detail restrictions within essential habitat on hydroelectric projects, as per the Interagency Agreement.

#### DEIS

Fish, Wildlife, and Sensitive Plants

**15** This section of the summary states that "[s]ensitive plants are protected or enhanced on a project by project basis." This implies that any enhancement or protection action necessary to "maintain viable populations" of sensitive plants will not occur unless this needed action is part of a proposed project. Thus, absent a Forest Service project, a given sensitive plant may be allowed to go extinct. This statement seems to conflict with Forest Service legal mandates.

#### Riparian

**16** Certainly the implementation of the Interagency Agreement, a management activity, will afford protection to some riparian areas harboring Rawson's flaming-trumpet. The final sentence of this section should be modified appropriately.

#### 1.4.5 - Fish and Wildlife

**17** The title should be changed to "Fish, Wildlife, and Sensitive Plants." Additionally, this section should be expanded to include relevant planning questions for sensitive plants.

#### 2.5.2 - Directions Common to All Alternatives

Under "Minimum Management Requirements," add to #1 "Essential habitat for Rawson's flaming-trumpet." Change #2 to read "Viable population levels for all fish, wildlife, and plant species."

#### 2.5.3.1 - Goals and Objectives

**18** As discussed above, change #3 to read "Manage fish, wildlife, and plant habitats to maintain viable populations of all resident or indigenous fish, wildlife, and plant populations."

#### 2.5.3.2 - Standards and Guidelines

**19** Change "Fish and Wildlife" to "Fish, Wildlife, and Sensitive Plants" and add beneath this heading, "Establish a 150-foot zone on each side of all creeks designated as essential habitat for Rawson's flaming-trumpet, as per the Interagency Agreement with the Fish and Wildlife Service."

#### 4.8.4 - Sensitive Plants

**20** This section briefly discusses the "risk assessment" for sensitive plants associated with each alternative. However, this section should be expanded to translate what a particular level of risk means to each sensitive plant. This should be comparable to the "Summary of Alternatives" (4.8.3.3) sections for spotted owl.

National Parks

Yosemite National Park

- 21** We believe that the recreation management objectives for the Iron Mountain Trail need to be clarified. The Recreation Opportunity Class map shows this trail as unclassified, while the Recreation Element Map shows the trail accessible to two-wheel drive vehicles only. We prefer to see this trail included within the Semi-Primitive Non-Motorized classification. Trail bikers using this trail could cross the river in late summer and continue up the Alder Creek-Bishop Creek trail into the park. Environmental damage could occur inside the park, and enforcement of regulations prohibiting trail bike use on this trail would be difficult.
- 22** We recommend the status and management of Spotted Owls both inside and outside the park receive further review. The plan states on page 3-8 that 24 Spotted Owl Management Territories will be maintained in the Forest. These will support about 50 birds. Page 3-45 states that the current population is estimated at 240 birds. These figures appear to be in conflict with the preferred alternative analysis on page 4-44 that shows an eventual reduction of only 47% in Spotted Owl population of unknown size and distribution, and our desire is to insure that this population remain viable and not become isolated from other populations.
- 23** The plan also calls for restocking and enhancement of wild turkey populations. National Park Service policy banning the introduction of non-native species requires that we express concern over the possible immigration of this animal into the park. In only a few years, ptarmigan have invaded almost all alpine areas in the park from a release site to the east of the park, demonstrating the need for caution. We do not know whether wild turkeys could find habitat within the park.
- 24** The management strategy for Management Area 7, the proposed Bishop Creek Research Natural Area, is of special interest to the park. We strongly support the concept of preserving a sample of the ponderosa pine community in a natural condition, and believe that the designation of this area would present a prime opportunity for a joint management plan covering the RNA and adjacent park areas extending up to Highway 41.
- 25** Our current management calls for restoring a natural forest structure in this area by restoring natural fire regimes. The first step toward this goal is the use of prescribed fire to reduce unnatural hazardous fuel concentrations and restore ponderosa pine dominance in the understory. Perhaps joint environmental restoration projects could be undertaken involving the RNA and adjacent park areas.

Sequoia and Kings Canyon National Parks

- 26** Comments on the subject plan and DEIS are essentially limited to proposals that could affect the park resources or visitor experience. There is little potential for significant effect on park resources, values or visitors, in

that most of the western boundary of Kings Canyon National Park joins the Sierra National Forest and all of that portion of the Sierra National Forest is designated wilderness. Therefore, even though some consumptive uses (grazing, etc.) are allowed on the part of the forest next to the park, management there is generally quite similar to management of the park.

1. Comments on the Plan:

27

Page 4-50 - Item #368 proposes new trail construction. We recommend coordination with NPS on any trails that would have an effect on the use of Kings Canyon National Park.

28

Page 5-1 - We see no indication of a monitoring program for the effects of backcountry use. We would encourage a monitoring program because it would enhance the interagency efforts toward consistent management of wilderness areas in the Southern Sierra.

2. Comments on the DEIS:

29

Page 2-30 - The 1,000 acre cutoff for fire confinement/containment on unbroken fuels seems nebulous. What is the definition of unbroken fuels and how do they relate to fire behavior and unnatural amounts of fuels? Perhaps this will be explained in a fire management action plan.

30

Page 2-42 - This section on wilderness includes 30 miles of new trail construction by 2030. The impacts of that trail construction should consider possible effect to Kings Canyon National Park for any that are located nearby.

31

Page 3-28 - The next to last paragraph indicates that prescribed fire will be used. In Chapter 4, under Wilderness, on page 4-37, the effects of prescribed fire are described. There is no indication of any limitation on the use of prescribed fire. We assume that there will be a fire management plan which will provide guidance for the use of prescribed fire. Any prescribed fire program in areas that could affect the park should be coordinated through the cooperative procedures currently in place.

32

Page 3-43 - We would be happy to cooperate with the Forest Service where our funding and manpower permit toward studies and projects to enhance several of the Species of Special Interest including Peregrine Falcon, Bald Eagle, Goshawks, Spotted Owl, Willow Flycatcher and Mule Deer. We note that Chapter 4, page 4-45, indicates that all of the alternative include continuation of grazing which will have adverse effects on willow flycatcher habitat. Preliminary studies done in Sequoia and Kings Canyon National Parks indicate that areas used by livestock have higher populations of cowbirds which have a direct adverse effect on willow flycatchers. We urge further study and consideration of modifying grazing programs where possible to enhance willow flycatcher habitat.

Page 4-44 - Once again we are interested in the Species of Special Interest as mentioned above.

Page 4-54 - In all of the alternatives, we recommend consideration of the willow flycatcher habitat in range management programs.

Wild and Scenic Rivers

**33**

We commend the Forest staff for their thorough and objective evaluations of the Nationwide Rivers Inventory segments contained on the Forest. We are particularly pleased to have had the opportunity to work with the Forest staff in the formulation of these evaluations and strongly endorse the wild and scenic river recommendations for those segments of the Merced, South Fork Merced, South Fork San Joaquin, and Middle Fork Kings Rivers that are contained in Yosemite and Sequoia-Kings Canyon National Parks. Also, we generally concur with the preferred alternative recommendations for the remainder of the inventory rivers contained on the Forest.

**34**

We note one inconsistency in the wild and scenic river recommendations contained in the draft environmental statement with those in the Appendix E evaluations. On page 2-42 of the draft statement, under 2.6.1.4 Wild and Scenic Rivers it is stated that segment 9 on the Merced River is not recommended for designation. In Appendix E on page 7-119, the summary indicates that all 10 segments are recommended for designation. It would appear that the recommendation set forth in the Appendix is the correct one as it would make little sense to break the continuity of the protected river corridor with the elimination of segment 9, a segment that is otherwise eligible for designation.

**35**

In the preferred alternative river segment classification for the South Fork Merced River, we suggest that you consider upgrading the visual quality objectives for areas adjacent to South Fork segments 1, 5, and 16. Timber yield prescriptions for Analysis Areas 9 and 19, both proposed for classification as "general forest," have the potential for degradation of the viewshed from inside Yosemite National Park. At the present time, views across the river canyon from inside the park still retain an unspoiled character. Logging in Analysis Area 19 could also affect water chemistry and turbidity on the proposed "wild" river both inside and outside the park.

In view of this situation, we suggest that you consider upgrading the Visual Quality Objectives for the east side of the Iron Mountain-Devil Peak ridge from Type IV (Modification) and Type III (Partial Retention) to Type II (Retention). An upgrade from Type IV to Type II should also be considered for Analysis Area 19.

36

Also related to rivers issues, the Plan Appendices, on page 7-82, should state that the peak diversion for domestic water use in Yosemite Valley was 3.1 cfs, not 23-1 cfs. This diversion was discontinued in 1986, with domestic water now supplied by three wells. The reference to the Cascades powerhouse on this same page should also be corrected. That powerhouse was permanently closed in 1986 and the diversion of 115 cfs (maximum) discontinued. The Cascades diversion dam will be removed by 1989.

Minerals

37

We have reviewed the Plan and DEIS and found it inadequate with regard to comparable forest plans and DEISs. It is suggested that the following changes and additions be made in the final.

1. The mineral potential map needs to be at the same scale as the alternative maps. This is necessary to allow the reader a comparison of the alternatives with mineral potential.
2. Illustrations and discussion of mineral potential need to be provided for each of the roadless areas and wild rivers. The Bureau of Mines has completed studies on most of these areas, and this data should be incorporated into this report to provide the public with all available data.
3. Our office reviews numerous EIS documents and has come across an excellent classification system as shown in the attached table II-II (Enclosure 1) pages II-71 and II-72 of the Beaverhead National Forest DEIS.

We suggest a modification of this as shown, using percentages rather than acreages. It is easier to envision the comparison and comprehend the effects each alternative may have on mineral resources. The numbers are the same as the Beaverhead table.

38

The potential classification consists of five parts, with a range from high potential to very low potential based on current knowledge. The availability classification consists of four categories, including withdrawn, specific legal protection measures, special management conditions, and standard operating conditions. Combining potential with availability and comparing acreages, an excellent statistical representation of minerals availability would be presented.

4. Provide an Evaluation Criteria for Non-energy Minerals such as that from the Wallowa Whitman National Forest, Oregon (Enclosure 2).
5. Provide a definition of access categories such as that from the Beaverhead National Forest, Montana (Enclosure 3).

6. Provide a point-counterpoint discussion of how minerals affect other resources and how decisions affecting other resources will, in turn, affect minerals. The best example to date is the DEIS from the Wenatchee National Forest, Washington.

39

7. A list of current mineral withdrawals, acres involved, and mineral potential for locatable and leasable minerals. The best example is the Los Padres National Forest, California.

40

In addition to these improvements, we are greatly concerned with item 114, 4.5.2.11 Minerals, page 4-31 of the Proposed Forest Land and Resource Management Plan. We suggest entirely the theory of surface reclamation following completion of mining. However, in this paragraph (last sentence) it states: "Reclamation will include the treatment of any unneeded mine shafts, tunnels, tailings ponds, or any other on-site developments."

Please either define in the text the limitations of the term "unneeded" or send to the Bureau of Mines a detailed explanation of exactly how and by whom these facilities are determined to be "unneeded."

Specific Comments (DEIS)

41

Page 2-45 (2.6.1.13): The text addresses mineral withdrawals within the Plan area. Which areas are being addressed and where are they located? Need to have a map(s) which identifies those areas which are currently withdrawn from mineral entry and those areas which are proposed under each alternative.

42

Page 2-125 (2.7.11): The text states that Alternatives A, C, F and H will recommend the withdrawal of an additional 1,140 acres. Similarly, it states that Alternative D and E will withdraw an additional 26,238 and 11,310 acres, respectively. These should be clearly identified on a map.

43

Page 3-2 (4th paragraph): Text states that about 180 reported mineral deposits of potential economic value occur within the Forest. A few are being explored or are in production. The questions are: (1) Where are these deposits located? (2) Which mineral are known or suspected to occur at these deposits? (3) Where is exploration/production presently occurring? (4) Will the proposed Alternatives have any affect on this activity? What is the source for mineral deposit information? A map should be provided showing the relative number of claims in given areas within the Plan boundaries.

44

Along these same lines, are there any mineral leases (e.g., oil and gas, geothermal) within the Plan area? If so, where are they located? The 1983 edition of "Technical Map of the Geothermal Resources of California by the California Division of Mines and Geology shows three known thermal springs within the Plan area but no mention is made of the springs or the geothermal potential.

**45** Page 3-97 (3.5.16.1, 2nd paragraph): The California Division of Mines and Geology map mentioned above shows over one-fourth of the Plan area to be favorable for geothermal resources. The Plan should be more specific on this issue.

Page 3-99 (3.5.16.1): The Multiple Use Mining Act should be briefly explained.

**46** The statement "Where mining has the legal right to develop..." suggests that the permitting-authorization of development of locatable minerals is discretionary; this is not true.

**47** Page 3-99 (3.5.16.2, 2nd paragraph): The text states "Little information exists about the quantity of any mineral resources in the Forest." If so, then what is the source of information presented in figure 3.04 on page 3-101? The term "mineral potential" as used by the FS should be defined.

**48** Page 3-99 (3.5.16.2, 3rd paragraph): Which maps (titles, dates) from CDMG, USBM and USGS were used during the Plan preparation? Are they in the references?

**49** Page 3-101 (Figure 3.04): Mineral Potential. The criteria to establish "very high-low" potentials should be defined. Since there appear to be little geologic data on mineral resources, why weren't any areas listed as unknown potential?

**50** Page 3-103 (3.5.17.2) If any of the "occupancy trespass" structures are on existing mining claims the status of the mineral exploration/development would help define the situation.

Page 7-201-203 (Table L.01): The locations of deposits such as Sanbornite and others if known, should be represented on a mineral map of the Plan area. This map could also include the location of the claims listed on Table L.02.

#### Specific Comments - Plan

**51** Page 3-13 (3.15): The "180 reported deposits and/or prospects containing minerals of potential economic value" which occur within the Plan area should be represented on an individual geological and mineral prospect map.

Again, the document should show which areas are closed to mineral entry and mineral leasing under each alternative.

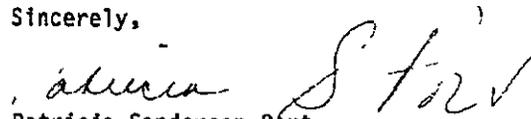
**52** Page 4-31 (4.5.2.11): Prescription #122: If a claim has valid existing rights (VER) in a withdrawn area, the operator does not have to conform to the purpose of the withdrawal as long as he remains on the claims. This should be worded to reflect recognition of VER.

**53**

Prescription #134: No leasable minerals such as oil, gas, etc., are known to exist in the Plan area but the potential, if any, should be specified. The geothermal area referred to should be represented on a mineral status map.

We appreciate the opportunity to review and comment on these documents.

Sincerely,

  
Patricia Sanderson Port  
Regional Environmental Officer

Enclosures  
As stated

ccs: Director, OEPR (w/orig. incoming)  
State Dir., BLM  
Reg. Dir., NPS  
Dist. Chief, GS  
Reg. Dir., FWS  
Chief, BM

**UNITED STATES DEPARTMENT OF THE INTERIOR  
Office of Environmental Project Review**

**RESPONSES:**

1. Facilities for administrative and public use within the Forest include adequate sanitation. To avoid ground water contamination, sanitation treatment facilities must meet local and state standards identical to those applied to private land. The issue of possible ground water contamination in new or existing sanitation facilities is addressed as a standard item in site investigation. This provides for periodic monitoring of ground water pollution potential. The impact from the abandoned barite mine is being studied under a program that will lead to implementation of measures needed to eliminate contamination of surface or ground water supplies should it exist.

2. Formal consultation, as specified under Section 7, will be initiated for project proposals that may impact listed species.

3. Clarification of Forest Service objectives for the two federally-listed threatened trout species is incorporated in the final Plan.

4. This section is revised in the final EIS. Detailed management guidelines for all sensitive plant species will not be addressed in the Plan, but will be included in individual Species Management Guides as they are developed. These guides will ensure that sensitive plants do not become federally-listed because of Forest Service actions.

Forest Service policy and direction, laws, and regulations require management and protection of sensitive plants and their habitats to prevent their placement on federal lists as threatened or endangered species.

5. Improving our baseline data is one of our highest priorities. However, adequate documentation indicating that any particular species in a declining state is not available. Such information would be useful for prioritizing the plants to be selected for development of the next Sensitive Plant Management Guide.

6. This information has been incorporated in the final Plan. Management strategies for these two fish species have been defined in their associated recovery plans. The Forest does not have plans to pursue a classification of critical or essential habitat for the streams supporting Lahontan or Paiute cutthroat trout. These federally threatened species are legally and adequately protected by the intent of the Endangered Species Act of 1973. The Forest has developed management S&Gs to provide further protection for these species as found in the EIS and in the Plan.

7. Although forest management has the potential to impact sensitive plants, conservation of sensitive plants is one of the most important considerations in planning and implementing a project. Consultation and cooperation with the Fish and Wildlife Service is an integral part of this process. The Forest has executed an Interagency Agreement with FWS and has an approved Species Management Guide for Rawson's flaming trumpet. A Species Management Guide for *Clarkia lingulata* is being prepared, and additional Species Management Guides will be developed for all our sensitive plants as directed by the Regional Forester. The long-term grazing of meadows supporting Bolander's clover has not been considered an impact, however, research is needed to ascertain whether an impact exists. Research data may also reveal that grazing is needed to maintain the species. Since High Sierra primrose is an annual plant, the vagaries of weather appear to be more of a threat to this plant than Forest Service actions.

8. Your suggestion has been included in the final document.

9. The appropriate changes have been made in the final Plan.

10. Detailed studies identified for any of the sensitive plant species will not be addressed in the Plan, but will be addressed in Species Management Guides. The sensitive plant program guided by the Endangered Species Act of 1973, Forest Service Manual, and regional direction ensures the conservation of species needing special management. By law, the Forest Service must consult with the Fish and Wildlife Service with regard to proposed projects which could affect listed or candidate plants and their habitats, including Rawson's flaming trumpet.

11. "Sensitive species" has been included in the title as suggested. Detailed management schemes will be addressed in Species Management Guides as they are developed for each of the sensitive plant species.

12. The wording of the S&G will read: "Greater emphasis will be given to habitat improvement for sensitive, threatened, and endangered species."

13. Your concern has been addressed in the final EIS.

14. The Interagency Agreement is binding, therefore, to add S&Gs that repeat existing direction is unnecessary.

15. The Forest is conducting sensitive plant surveys and inventories to add to the data base. This will help determine the priority for preparing Species Management Guides. Each Species Management Guide will describe long-term goals and objectives for protecting and enhancing that plant species.

16. Adding to this section will not improve the clarity or direction of the document.

- 17 Sensitive plants have been added to this section. MMRs are developed at the regional level and are outside of the authority of the Forest to change Rawson's flaming trumpet is not a federally-listed species, but protective measures outlined in the Interagency Agreement and Species Management Guide for this plant will be strictly enforced. Your concerns were addressed in the MIR, pg 2-23 of the DEIS.
- 18 and 19. Your suggestion has been included in the final document
20. The risk assessment portion of the Plan will be removed from the final EIS. Risk assessment for sensitive plants will be addressed in individual Species Management Guides.
21. The Forest regrets the lack of clarity of the Recreation Element (Travel Plan) Map. It is the Forest's intent not to manage the Alder Creek/Bishop Creek trail for 2WD vehicles.
- 22 All of the estimated 240 owls in the Forest are not found in SOHAs. In future decades this will still be true. There will be about 50 owls in SOHAs, while the rest will be elsewhere.
23. The Forest Service and the CDFG have been restocking turkeys in the Forest. The Forest will coordinate its efforts with the Park Service
24. Thank you for your support.
25. Currently, the Forest, adjacent Forests and Parks, and California Department of Forestry are working together on prescribed fire and natural fire planning and coordination.
- 26 Thank you for your comment.
27. It is our practice to coordinate with adjacent landowners, whether private, state, county, or federal agencies, prior to any development that affects them
- 28 Backcountry activity is currently monitored along with other recreation in the Forest. No specific monitoring of this item is part of the Plan. There will be a review of backcountry activities when wilderness quotas and management plans are revised.
29. The 1,000-acre cutoff was chosen because of an analysis done related to existing fuels in the wilderness, best judgement on fire behavior if those fuels were to be ignited under average weather conditions, and personnel needed to monitor or suppress that fire or other fires
30. Coordination with Kings Canyon National Park will take place prior to any new trail construction that affects them.
- 31 Fire will be addressed in the implementation phase of the Plan, under Fire Management Action Plans.
32. Your offer of assistance is appreciated. Your agency will be contacted when the Forest begins its studies. The S&Gs for riparian areas have been modified to better protect wildlife habitat. If grazing is adversely impacting Willow flycatcher habitat, protective measures, such as timing and distribution of grazing and structure controls, will be implemented. Several projects to improve and protect Willow flycatcher habitat are planned, and at least two should be completed in fiscal year 1989.
33. Thank you for your support.
34. The final Plan will show Segment 9 as recommended for designation. Appendix pg. 7-120 and the reference to Segment 9 in the DEIS will be eliminated in the final EIS.
35. VQOs are not arbitrarily assigned to protect viewsheds. The combination of the variety class and distance zone makes the Iron Mountain/Devils Peak Ridge area a Type IV modification.
36. These corrections have been made in the Appendix and the final EIS. Percentages were determined from Table 4.19 by the differences in yield at the end of decade five and the base year amount of 2.6 MM acre/feet.
- Sanitation problems are mainly those that affect local surface supplies. With increased education concerning proper field sanitation, this problem will diminish. Existing vault toilets are supposed to be leakproof. Those found to be in violation will be repaired or replaced. The abandoned barite mine is being investigated and will be handled as a special project.
37. Since mineral potential was not a public issue or management concern, an element map was not developed. Larger scale maps, illustrations, and discussions about mineral potential in wild river areas are available in the files for review. There are no roadless areas in the final EIS
38. Since mineral potential and activity is not a major activity or a critical issue or concern, the Forest did not provide details as presented in the plans cited. The concerns raised will be addressed in environmental assessments, which will be prepared for each proposed project.
39. Thank you for your comment. A map and list of mineral withdrawals have been included in the final EIS.
40. This statement has been clarified in the final EIS.
41. A withdrawal map and chart have been developed and included along with a table showing acres withdrawn by type.
42. The alternative maps show areas of additional withdrawal. The text has been changed to identify them.

43 The source of mineral deposit information was the Bureau of Mines Mineral Industry Location (MILS) This information was part of the data used to develop the Mineral Potential Map. The Forest does not believe the data are necessary to include in the Plan Interested parties can find the data in MILS

44. There are currently no mineral leases within the Plan area. The Plan has been modified to reflect the geothermal potential of the three springs.

45. The second paragraph has been modified to clarify the geothermal situation. The Multiple Use Mining Act was briefly explained in DEIS, Sec. 3.5.16.1.

46. The paragraph has been rewritten to clarify this point.

47. The text has been clarified. However, limited information is available about some mineral resources.

48. Revisions in the text include maps.

49. The criteria to establish high/low potentials is now defined. The maps consulted did not have "unknown potential" as a category.

50. "Occupancy trespass" refers to land line survey and not to minerals.

51. This level of detail was not provided in this planning effort because public input did not indicate a great concern or interest in minerals. Forest and district files contain this information.

52 S&G 122 has been clarified and changed to S&G 140 in the Final Plan Thank you for your comment.

53. S&G 134 has been clarified and changed to S&G 152 in the Final Plan. Geothermal areas will not be included on the mineral status map. Their location can be found on maps in our files.

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

**BOARD OF FORESTRY**

1416 NINTH STREET  
P.O. BOX 944246  
SACRAMENTO, CA 94244-2460  
(916) 445-2921



January 9, 1987

Mr. James L. Boyington  
Forest Supervisor  
Sierra National Forest  
1130 "O" Street  
Fresno, CA 93721

Dear Mr. Boyington:

The California State Board of Forestry (Board) has completed the review of the Sierra National Forest Draft Management Plan. Several areas of concern were identified during this review process. Based on these concerns, the Board approved and supports several recommendations which we believe need to be addressed in the final management plan for the Sierra National Forest.

By law, the Board is charged with representing the state's interests in federal land matters pertaining to forestry.

The Board has approached the plan in the belief that the Sierra should be positioned to meet the needs of the people of California in the coming decade. Our analysis indicates that demands for more recreation, a reliance on the forest for local revenue, and a well-protected biological base are all part of that position.

The Sierra Draft Plan and Draft Environmental Statement were compared with the five issue areas developed at the Board of Forestry's Centennial Conferences of March and December of 1985. The issues identified are: 1) rural economic stability and development, 2) protection and maintenance of the biological base, 3) social pressures on the rural land base, 4) rights and responsibilities of public and private ownership; and 5) coordination and planning.

Mr. James L. Boyington  
Page Two  
January 12, 1987

As a result, 11 areas of concern were identified for this region of the state. These areas are: 1) visual resource protection; 2) annual sale quantity; 3) timber mortality; 4) reforestation backlog; 5) research needs; 6) wild and scenic rivers, 7) recreation; 8) fire protection; 9) hardwoods; 10) the budget; and 11) aggregate review. These issues were used by the Board to evaluate each alternative and to help determine which alternative would best meet the needs of this region of the state. The results of this analysis and the Board's recommendations are listed below

#### Recommendations

##### 1. The Alternative

All the Alternatives presented meet the standards required in the laws and regulations for protection of the broad range of resources the forest represents.

The Preferred Alternative was developed to provide the best response between commodity outputs, resource protection, and protection of amenity values. We can reasonably support the Preferred Alternative (A) but with reservation. Several concerns have been identified and recommendations proposed which should be incorporated into the final selected alternative. Those recommendations are listed in items 2 through 13.

##### 2. Visual Resource Protection

The socio-economic impact resulting from modifying silvicultural practices to meet a perceived visual objective desired is significant.

1

Page 3-69 DEIS states that one principal limitation to achieving higher timber production goals (and therefore improved economic performance) is visual resource protection. Page 3-22 DEIS states that no specific statistical analysis of the demand for visual quality is available, and the presence of strong demand can be inferred from a variety of sources. Page 7-43 APPENDIX states that present management and public expectations of the foreground are that no activities are visually evident.

Mr. James L. Boyington  
Page Three  
January 12, 1987

Our concern is that overly restrictive requirements are being applied to productive timberland which are more restrictive than the public expects. Landscape protection practices may not represent the actual demands of the public. Visual protection should be based on an objective study. Present perceptions of public demands may be too conservative.

2

We recommend a study to provide a statistical analysis of the public's expectations for visual quality. We recommend that the body of requirements presently utilized for landscape protection be amended based on the study's findings. This study should be included as an additional research need in Appendix B, pg 6-3 Plan. The Sierra National Forest should seek to practice regulated uneven-aged management within the areas that are shown in the plan as requiring restrictions due to visual significance.

3. Annual Sale Quantity (ASQ)

A. It appears the annual sale quantity in Alternative A could be adjusted upward for the following reasons:

- 1) Current forest productivity appears to support a higher level of production;
- 2) To improve economic indicators,
- 3) To increase Receipts Acts payments to the three dependent counties; and
- 4) To improve stability of the local economies.

3

We therefore recommend a full explanation as to why the ASQ in Alternative A should not be increased, incorporating items 1-4 above in the discussion. This information should be made public before approval of the plan. Our Southern District Technical Advisory Committee contends that the ASQ should be about 136 MMBF.

4

B. The planning documents identify a large discrepancy in the allowable sale quantity for Alternative A. Table 2.23, pg 2-141 DEIS lists 125.2 MMBF for the first decade. However, the "Planned 10-year Total" shown on Table C.06, pg 6-28 plan shows 998.2 MMBF or about 100 MMBF annually.

We recommend that the DEIS and the forest plan be amended to identify the correct planned volume, and this information made public before approval of the plan.

5

- C. Table 5.01 in the Draft Plan specifies a monitoring program for keeping track of the annual timber harvest volumes. The Sierra intends to monitor the volume at the end of the first five years of the plan and would be satisfied to be within 15% of the annual harvest at that time. If the Sierra is 15% below the budgeted five year sale quantity, it is expected that this could adversely effect local communities.

It is recommended that the monitoring level on timber sale volume be reduced from plus or minus 15% in five years to plus or to minus 5% in five years in order to emphasize the importance of maintaining the level of harvest to provide economic stability for rural economies.

4. Timber Mortality

6

Neither the Forest Plan nor DEIS identify the volume of mortality that exists and could be utilized. The volume of mortality generated annually or over a 10-year period is undoubtedly substantial.

We recommend the DEIS be amended to identify the volume of annual mortality. The discussion should include management practices used to capture this loss. A "nonchargeable volume" should be added to the timber resource element, Table 2.24 DEIS.

5. Reforestation Backlog

7

The planning documents are not clear concerning the possible existence of a reforestation backlog. We note on pgs 3-58 and 3-69 DEIS that the old plan had an implied regeneration harvest level of 5,200 acres annually. The average annual acreage planted over the life of that plan was 1,400 acres. Page vii DEIS states that recent harvesting levels cannot be maintained without intensifying timber management. Because of these statements and others, we sense a backlog of land exists that requires reforestation. If this is the case we believe the acreage of evenaged management planned for Alternative A cannot be regenerated based on prior performance. Further, a backlog will surely affect other management activities.

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We recommend clarification of the existence of a reforestation backlog. The discussion should include how the problem will be corrected now and if the acreage of evenaged management scheduled for Alternative A can be regenerated on a timely basis.

6. Research Needs

In addition to the need for visual quality research, two additional subjects require aggressive and committed investigation. By identifying these, we are not discounting those listed in Appendix B, pg 6-3 plan.

A. Spotted Owl

8

The PRF Alternative recommends 108 owl territories (Table 2.23, pg 2-141 DEIS). However, the Draft Plan provides for 18 territories in the commercial forest zone and 6 territories in wilderness. We support a viable spotted owl population; however, studies indicate conflicting information on habitat requirements. Apparently little conclusive data is available concerning the owl's habitat needs or the dispersal habits of the young birds. A great deal more information is needed about the owl and its environmental requirements. The values are so great that the Forest Service must develop an accurate spotted owl information base.

We recommend that the Forest Service pursue an aggressive research program to resolve questions on spotted owl management and habitat needs.

B. Biomass

9

Periodic removal of biomass from the forest generates questions and concerns about depletion of soil fertility and impact on soil productivity. These questions and concerns should not wait for another major environmental controversy to develop before the need for an aggressive research effort is fully recognized and supported. We strongly support research item #17, Appendix B, pg 6-4 of the plan.

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7. Wild and Scenic Rivers

10

The Preferred Alternative recommends increasing the wild and scenic river designation from 0 to 225 miles of river. The economic and cultural consequences of this proposal need to be fully understood by the public before incorporation into the final alternative.

We recommend that full disclosure of the economic and cultural consequences of the addition of 225 miles of river to the wild and scenic river system be made public before approval of the final plan.

8. Recreation

11

The DEIS does not identify recreational priorities in a brief, clearly understandable, itemized format. We did discover that funding has decreased, and demand is projected to increase. We note that lack of parking and sanitation facilities is a common problem over much of the forest (pg 3-17 DEIS). Many picnic sites need rehabilitation.

We recommend correcting sanitation deficiencies and parking congestion problems, rehabilitating existing campgrounds and developing additional campgrounds based on need.

9. Fire Protection

12

The Preferred Alternative proposes for its fire management program: 68 percent for initial attack, 20 percent for prevention, 1 percent for detection, and 11 percent for fuels management. The Alternative does not clearly identify the priorities for fuels management, and if the program will be directed away from areas where the greatest benefits would occur. We note that 33 percent of the program budget went to prevention in the Current Alternative, while 20 percent is set aside for prevention in Alternative A.

We are concerned where the reductions in prevention activities will be made in the current prevention program. Are reductions to be made near residential areas or where the incidence of fire is the greatest? And what does 68 percent initial attack mean? Is the forest considering funding through CDF's Green Book Allocation?

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13

In discussing fire protection, the DEIS is written as if the forest existed in isolation from the outside world. We believe that the proper context is that it exists as part of a larger community.

It is recommended that:

- A. The chosen alternative be amended to identify what protection and educational efforts will be used to protect high dollar investment areas from fire loss.
- B. The fuels management and fire protection proposals from the entire region need to be analyzed in aggregate to determine what effects the inconsistencies in forest programs will have on the ability of the state and the Forest Service to control major fires, especially during peak fire weather conditions.

10. Hardwoods

14

It has been observed that the Sierra's approach to oak retention for the benefit of the deer population appears significantly different than the proposed programs for the Stanislaus, Tahoe, and the Sierra National Forests. It is recommended that the oak-hardwood retention programs be reviewed in aggregate with other national forests. The reasons for different hardwood retention standards between adjacent forests must be clearly stated and understood before approval of the final plan.

11. Budget

Funding is probably the most critical issue in the national forest planning process. Each forest has indicated that the proposed plans present only targets that the forest feels could be attained if funding were available. Further, most planners appear to be in agreement that forests do not have any obligation to maintain production at the proposed levels if there is insufficient funding. It is impossible to determine what the long-term effects will be on the people of the State of California given budget constraints of the Forest Service.

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15

It is recommended that the final plan explain in detail the fall back position in the event that the selected alternative is not fully funded. Our recommended priorities, given fewer dollars, would be to first, protect the biological base; second, ensure a stable flow of logs to the forest products industry; and third, provide for increased recreational opportunities. We believe the final plan should reflect these priorities at a reduced budget level.

12. Aggregate Review

16

The impact counties contain two other national forests (Stanislaus and Sequoia). These Forest Service lands have a significant impact on these counties. The inability to review these plans simultaneously is a significant limitation because aggregate effects of the final plans could be significant.

17

We recommend that in order to resolve this concern, aggregates of plans by economic region be reviewed before final decisions on preferred alternatives are made for individual national forests.

Thank you for the opportunity to comment on this draft plan.

Sincerely,

*Harold R. Walt*

Harold R. Walt  
Chairman

cc Zane G. Smith

**STATE OF CALIFORNIA  
Board of Forestry**

**RESPONSES:**

1. Studies relating to public expectations of visual quality verses property value are being conducted by the Forest Service through the Pacific Southwest Experimental Station. The results of the studies will be used in future revisions.

2. The desired visual character for the retention area is to grow and maintain oldgrowth tree characteristics. Depending on site conditions, trees need to grow between 180-250 years to obtain these characteristics. Regardless of the silvicultural method used, extending rotation ages to these lengths causes a reduction in the ASQ.

3. The final ASQ is a lower production level than envisioned in the DEIS (125.6 MM) and lower than the historical average (133MMBF) because it responds to changes in management direction that provides greater protection to other resources. It also recognizes past designation by Congress of timber land into wilderness. Timber management will be conducted on 328,900 acres of the Forest's 393,700 acres identified as tentatively capable, available and suitable for timber production.

4. Thank you for pointing out the discrepancy between the volumes shown in Table 2.24 and the ASQ. This will be corrected.

5. The purpose of monitoring is to focus on indicators that suggest that the entire plan needs review. In other words if the average sell during the five years is plus or minus 15%, the whole plan is reviewed and revised, if needed. In the Forest's opinion, a variance of 5% would not be significant enough to warrant this effort and expense. However, the Forest shares your concerns and has developed internal systems to ensure that the ASQ is met.

6. The final Plan and final EIS include volumes of mortality.

7. Many of the responses received raise the question of whether or not the Forest has been reforesting clearcuts, and also all regeneration cuts in the red fir type with a success level high enough to justify the proposed harvest levels in these two situations.

Clearcutting will only be proposed in the ponderosa pine and mixed conifer types so the reforestation record in these situations is most important in determining the results that can be expected with this type of harvesting. The Mariposa and Pineridge Districts have been planting recent clearcuts in ponderosa pine and mixed conifer significantly more than the other two Districts, so their record is indicative of what can be expected. Starting with 1981, 55% of the acres have been certified as successful, 1982: 85%, 1983: 61%, 1984: 85%, and 1985: 81%, as of January 1988.

In the case of reforesting the red fir type, the Forest cannot point to a string of successes, but rather to a trend. The trend is anchored by knowing the technical requirements to do the job, such as providing shade with a shelterwood, controlling gopher depredation, and high-quality site preparation. When these technical aspects come together as they have been on the Pineridge District since 1983, it is evident that the red fir type can be reforested with careful attention to detail and some extra time.

8. The Forest agrees with your recommendation. Research is continuing on the Spotted owl through the Forest Service Spotted Owl Research Development and Application Program.

9. Thank you for your support.

10. Full disclosure of the economic and cultural consequences of adding 222 miles to the W/S river system is shown in the draft LMP in the Appendix, pp. 7-73 to 7-157.

11. The Forest agrees that S&G 6 in the Draft Plan stipulates an increase in developed site capacity of about 7% by year 2,000. Parking, congestion, and sanitation problems are most prevalent in areas heavily used by winter recreationists. S&G 16 in the Draft Plan provides parking and sanitation facilities for snowplay, snowmobiling, and cross-country ski areas.

12. Priorities for fuel management will be more specifically defined during plan implementation. Reduction or manipulation of fuels related to timber harvest will be first, fuelbreaks near populated areas will be second, and wildlife and grazing enhancement will be third. The Plan calls for continued and increased cooperation with other agencies. During initial attack against fires, 68% of fire resources or budget will be allocated.

13. a) The identification of protection and educational efforts to protect high dollar investment areas from fire loss will be contained in the Fire Management Action Plan, which is currently being assembled.

b) It is not our intention to hold up Forest Plans based upon aggregate effects determination. Individual forest plans provide an acceptable protection program. These cost efficient programs are intended to give protection, organization, and allow for consistency with other resource programs for each Forest. The National Fire Management Analysis process is used to determine these cost efficient programs. The fire programs are not expected to meet all peak weather conditions that are experienced on other units. The Forest Service uses a "total mobility" concept utilizing Forest Service resources nationwide.

In addition to Forest Service resources, there are other federal agencies that provide resources. The Forest relies on cooperation from state agencies, Office of Emergency Services, county, city, and independent fire districts. The mobility concept provides a sound protection capability to

all agencies at a lesser cost than if each agency were to meet its own peak workload independently

14 This is a Forest planning effort designed to meet local needs of each Forest. However, there is coordination and information sharing between Forests. For example, Sierra's oak retention standards are similar to Sequoia's and somewhat less stringent than the Stanislaus'. Our standard was agreed to through the ID team decision making process. Both wildlife and timber interests were well represented in all ID team meetings. The standard does not meet all timber management expectations nor does it meet all the needs for wildlife. The decisions reached will maintain acceptable wildlife habitat, yet produce fairly high timber yields.

15 and 16. Your recommendations have been considered and a budget section has been added to the Appendix of the final EIS

17 While your suggestion provides an opportunity to review plans for an adequate affect, it has the disadvantage of holding up all plans until the last one is completed. The Forest has been developing this Plan since 1979 at considerable expense. We are extremely anxious to complete the process. The Sequoia Plan has been published, and because of devastating fires in 1987, the Stanislaus National Forest will not be completed until 1989 or 1990. Delay of the Forest Plan until the Stanislaus has completed their plan is unacceptable by regional and national direction.



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GOVERNOR

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1543 & 1717

916/323-7480

DATE: January 12, 1987

TO: Mr. James Boynton  
U.S. Forest Service  
1130 O Street  
Fresno, CA 93721

FROM: Office of Planning and Research  
State Clearinghouse

RE: SCH 86090801---Draft Land and Resources Management Plan and EIS,  
Sierra National Forest.

As the designated California Single Point of Contact, pursuant to Executive Order 12372, the Office of Planning and Research transmits attached comments as the State Process Recommendation.

This recommendation is a consensus; no opposing comments have been received. Initiation of the "accommodate or explain" response by your agency is, therefore, in effect.

Sincerely,

Huston T. Carlyle, Jr.  
Director, Office of Planning and Research

Attachment

cc: Applicant

DETAILED COMMENTS

Comments, Land and Resource Management Plan:

Page 3-5, Wild and Scenic Rivers:  
(also Standard No. 29)

- 1 The Department concurs with the Forest's stated intent to withhold management activities within the identified Wild and Scenic River corridors, which could preclude eventual Congressional designation. As you are aware, the State Fish and Game Commission has taken action to designate two of the identified stream reaches as Wild Trout Streams. We have developed management plans for these streams, in cooperation with the Forest, and believe our objectives are consistent with the Forest's current proposed action.

Page 3-7, Paragraph 1:

- 2 We disagree that there is limited opportunity to improve streams with low quality aquatic habitat. Habitat degradation results largely from non-responsive management, associated either with commodity production or public recreation (Page 3-6, paragraph 1). Damage, caused by these activities, can be repaired and, over a period of years, habitat quality and fishery productivity can be restored. We believe the Forest should follow the lead of the Eldorado National Forest and take an aggressive role in (1) inventorying habitats which have been degraded or damaged, (2) identifying corrective measures needed, (3) budgeting and developing projects to recover damaged habitats, and (4) implementing Standards and Guidelines to prevent additional, future damage to existing degraded and productive areas.

We recommend that available sources of funding be utilized for habitat restoration, as described above. In addition to County Fish and Game fine revenues (as indicated in DEIS 2-25 and Standard No. 33), we believe a portion of the cost should be born by those responsible for the damage. These should include assessments made upon timber harvest (such as KV Money) or in the form of increased assessments made upon grazing permittees.

P. 3-8, Diversity:

- 3 Under the preferred alternative, the old-growth Ponderosa Pine type will increase over current conditions, while old-growth mixed conifer type will decrease substantially. This is due to the planned conversion of mixed conifer stands to Ponderosa Pine, and silvicultural practices emphasizing even-aged, low-diversity management. Long-rotation, large diameter, late seral stage, mixed conifer stands represent an important wildlife habitat component. As such, the Department does not support the planned reductions of up to 60 percent of these stands, as proposed.

We recommend that Standard No. 99 be revised to assure that Ponderosa Pine, mixed conifer and Red Fir species composition will be maintained at close to current levels. Further, we recommend that seral stage 4c (old growth) composition be maintained at or near current levels for all vegetation types.

(Please also see our comments, ref. Page 4-29)

Page 3-9, Sensitive Plants:

We recommend inclusion of the following standards for protection of known sensitive plant populations.

- 4
1. Sensitive plant species, although not subject to the provisions of the Endangered Species Act, will receive special management to prevent their placement on federal lists, as discussed in FS Manual 2670.3.
  2. The Forest will develop species management guides for sensitive plants. These guides will function as "recovery plans" defining activity constraints in essential habitat and the specific needs for monitoring of land allocation and manipulation.
  3. The Forest will actively pursue status determination and long-term protection of sensitive plants.
  4. The Forest inventory of sensitive plants will be completed before the next round of Forest Planning.

Page 4-2, Paragraph 5:

- 5
- Recognizing that the public lands may represent the principal areas which will be available in the future to support fish and wildlife, we are concerned with the interpretation and use of "viability", as a standard applied to the maintenance of resident and migratory species populations. If habitat is managed in such manner that these populations are reduced to bare "viability" (survival) levels, the reduced populations would be of little value to the general public. We believe it is not enough just to know that wildlife populations will not be lost. The public also has a right to utilize these resources for consumptive and nonconsumptive purposes. The "viability" standard will simply not provide for such utilization unless it is clearly stated that "viability" embraces all historic and projected uses in addition to mere survival. We recommend that habitat be managed with a goal to maintain or improve all present fish and wildlife populations as called for in the California Fish and Game Code. We note that population levels are already severely reduced from historic conditions for some species.

Page 4-2 Standard No. 63:

- 6 We believe it is very important to recognize the down-watershed effects of streamside disturbance, even in the smallest of ephemeral tributaries. It is therefore important to establish firm protective standards for streams of all sizes and classes.

Page 4-21, 4.5.2.5 Fish and Wildlife:

- 7 We recommend inclusion here, of an additional standard which affords specific protection to known Willow Flycatcher habitats. This standard should involve regulation of the timing and distribution of grazing, including structural controls, where indicated.

Page 4-22, Standard No. 35:

- 8 We believe protection of identified nest sites of sensitive species should be provided at all times, rather than just ". . . until they are unoccupied by young", as proposed. The recent court decisions in the case of the Palila, an endangered bird on Hawaii, indicate a higher standard of sensitive species protection is necessary. Depending upon the species involved, particular cases (nests) may warrant formulation of specific management standards, in order to assure their continued use.

Page 4-22, Standards No. 36 and 37:

- 9 The Department concurs with these two standards, identifying the Forest's general objectives to obtain (1) instream flows suitable for maintenance of pre-project fish and wildlife conditions in the development of new hydroelectric projects and (2) improvement of degraded conditions in relicensing actions for existing projects. This general approach is quite consistent with the goals and objectives of the Department.

Page 4-23 Standard No. 44:

- 10 The standards for management of snags and down-logs appear to satisfy the minimum requirements for maintaining viable populations of wildlife species which depend upon these habitat types. Reductions in the numbers of snag-dependent species, such as cavity nesting birds will, however, occur under the planned retention standards. Such reductions are contrary to RPA goals. Further, there is no standard which provides for continued snag/down-log densities over extended time periods.

We agree that hard snags should be "well distributed through the compartment", as stated under 44f. However this appears to be in conflict with 44h., which requires concentration of snags in areas near streams, meadows and the edges of openings. Both of these considerations are important, but to provide both would require hard snag retention standards somewhat greater than the proposed average level of 2 snags per acre. In addition, all "soft" snags should be retained, as recommended in Ag. Handbook #533, Page 66.

**11** To be properly distributed, snag placement should be determined on a site-by-site basis and be based upon planning increments of small (less than 50 acres) size. Retention of snags would thereby be planned in much the same manner as silvicultural site prescriptions.

We concur with use of the "clump" approach, as proposed, however we recommend that the above clarification be provided, regarding distribution and replacement. In addition, specific snag management zone standards are needed to identify what, if any, disturbance factors would be allowed.

Page 4-23 Standard No. 46a:

**12** This standard requires the maintenance of mast-producing oaks in numbers "proportional to the current inventory". This statement is unclear. On designated timber lands, it could result in severe reductions in the abundance of oaks wherever other vegetative components are also substantially reduced. This would produce an unacceptable change in wildlife species composition. Together with oak reductions allowed under Standard 46c. (75 percent), impacts upon a broad variety of wildlife species could be very great.

**13** We recommend the oak retention standards for non-critical deer habitat be increased to a minimum of 15 percent crown closure, or 25 percent of existing crown closure, (both) as averaged over areas not exceeding 40 acres in size. In addition, specific restocking measures need to be identified to assure an adequate long-term oak supply.

Page 4-23 Standard No. 46b:

Under this standard, within identified critical deer habitat, up to 50 percent of the existing oak stands could be removed, down to the minimum retention standard of 20 percent crown closure. Loss of this mast production would reduce available forage for deer and other wildlife. It would reduce the Forest's capability to achieve the recovery goals of the North Kings and other deer herd plans.

In identified deer habitats we recommend a minimum oak retention standard of 40 percent crown closure, where present, or 50 percent of the existing crown closure, whichever is greater. This should be determined, based upon averages over areas not exceeding 40 acres in size.

P. 4-25, Standard No. 62:

**14** While we agree that an inflexible 100-foot-on-each-side SMZ standard may not always be well-suited to individual site characteristics, we are concerned over the allowance of discretionary encroachment into protective zones, based upon

development of an individual Environmental Assessment. Site-to-site variation in zone width could become very difficult to enforce, especially if the standard was to vary within individual timber sales or other activities. We recommend that firm and more protective guidelines be adopted which establish the SMZ requirements for Class I, II and III streams. We note the following SMZ recommendations of other, similar national forests in California.

1. SMZ Guidelines as Recommended by Eldorado National Forest

Guidelines For Establishing SMZ Widths

Stream Class	Stability <sup>2/</sup> Soil/Slope	Recommended Width From Streambank	
		Perennial	Intermittent
I	Stable	200-300	150-250
	Unstable	300-600+	250-500+
II	Stable	100-200	100-150+
	Unstable	200-400+	150-300+
III	Stable	100-150	100-100+
	unstable	100-250+	100-200+

Widths shown are in feet and represent one side of the stream only.

<sup>2/</sup>Within the SMZ ground cover density shall not be reduced below 60 percent for stable watershed conditions and 70 percent for all other conditions.

2. SMZ Guidelines as Recommended by Sequoia National Forest

Stream Class	Slope in Percent				
	0-30	31-40	41-50	51-60	61-70
I	100	130	160	190	220
II	75	105	135	165	195
III	50	80	110	140	170
IV	25	45	65	85	105

15

If the 100-foot (on each side) SMZ is to be used, as proposed, we recommend that (1) no timber be removed within 100 feet of the edge of any stream, except for the benefit of riparian or aquatic habitat values, (2) that any such harvest not be a part of the Forest's scheduled timber harvest program, and (3) that ground cover (duff, litter, plants, etc.) be maintained within the SMZ to afford surface erosion protection.

16

We further recommend that the standards for riparian area management (Section 4.5.2.5 LRMP P 4-25) be applied to all wetland and wet meadow areas on the Forest. We recognize that management within the protective "ring" around meadows requires variation, due to soil, slope, and species microhabitat conditions. Varying crown closures, for example, may be needed between different emphasis bird species. In some cases, this could require careful removal of specific trees, or other modifications to the habitat. For the benefit of wildlife and the meadow ecosystem, we recommend that such variation be allowed, within the 100-foot protective zone. Disturbance should only take place (1) based upon pre-defined criteria, (2) only when wildlife or the meadow system would benefit from the changes and (3) only after consultation with a qualified wildlife biologist.

We concur with a number of the standards proposed in the Plan for protection of riparian systems. Specifically, these include Numbers 57 and 58 (new road and travel route exclusion), 59 (fish and wildlife management emphasis) and 60 (maintenance/enhancement). We also concur with Standard No. 30 (pages 4-21, 22), regarding water drafting.

We believe these guidelines could be strengthened by inclusion of the following additional conditions:

- e. Prohibit permanent or substantial physical modifications of streambeds to facilitate drafting.
- f. Prohibit "topping-off" and overflow of trucks to prevent surf-acre erosion and stream sedimentation, or provide overflow/erosion containment measures at drafting sites.
- g. Establish drafting sites, based upon consultation with a fisheries biologist.
- h. Prohibit all drafting from streams inhabited by listed threatened or endangered species, to prevent their accidental "take" into pumps or degradation of their habitat.

Page 4-26, Standards No. 64, 68 and 72; Range Management:

17

Range management on the Forest has the capability to modify habitat values for both wildlife and fisheries. In some locations, livestock have overgrazed riparian ecosystems, trampled streambanks (see Page 3-6, paragraph 1) and eliminated cover and forage required by wildlife in meadows and other areas. The distribution of livestock is difficult to control, as fencing and other structural controls are expensive to construct and maintain. As a result, stock tend to congregate in wet and dry meadows and riparian corridors, where their interface with wildlife is intensified. Decreased production of wildlife and fisheries has resulted, including reductions in identified sensitive species, such as Willow Flycatchers.

18 It is apparent that even at the Forest's present allotment of 35,000 AUMs, there is need for structural livestock controls to be installed and maintained in specific locations. We believe this control should be provided at the expense of the grazing program, which under Multiple Use Direction, has the responsibility to minimize avoidable adverse effects upon other forest resources/uses. This approach to funding would be consistent with the direction stated in Standard 76, Page 4-26.

19 We recognize that planned increases to 44,100 AUMs represents recovery of use which historically has been present, but in recent years has been inactive, due to conditions in livestock marketing. Even at the present 35,000 AUM level, however, we have collected data indicating wildlife problems, related to livestock/wildlife competition. It is therefore logical that additional AUMs should only be allowed following successful (and environmentally sound) type conversion of new range and improvement of range which already exists.

20 Standard No. 68 would permit increased winter and early spring grazing on low elevation, annual grass ranges and new type conversions (converted oak-chaparral). If winter increases in grazing are scheduled before mid-January (when new green forage appears), adverse competition for acorns and other seed forage would occur. This could have effects upon deer ovulation rates and fetal condition, which could affect the ability of presently depressed herds to recover.

Studies of the North Kings Deer Herd indicate that deer ovulation rates and fawn fetal condition may be lessened, among does forced to compete with cattle on the winter range. These factors can result in lower overall fawn production. It follows, therefore, that it may be difficult to recover deer herd numbers, faced with increased winter livestock competition.

Page 4-28, Standard No. 90:

21 We are concerned about the requirements regarding the timing of management of adjacent timber regeneration units. Although Standard No. 90b provides a 660-foot buffer zone separating any two adjacent regeneration units, this standard appears only to apply for a period of about three years, until restocking is complete. (Standard 90c would allow adjacent cutting, after the older unit becomes restocked with timber of 4 1/2-foot height). Intensive release management is also planned on these areas for the first three years, in order to meet the stocking requirements in Standard No. 88. Competing vegetation (of value to wildlife) would therefore be eliminated during that period.

Wildlife will face loss of use of the regeneration areas (up to 40 acres in size) for the three year period, after which vegetation would be allowed to re-invade the stand. Before that vegetation is reestablished however (2 to 3 years), all adjacent

stands could be cut and release management begun. This tight scheduling virtually negates the value of the intended separation corridors as originally intended, and significant reductions in wildlife habitat will result.

- 22** We recommend that regeneration areas be managed and buffered as "openings" until native shrubs and forbs have become well re-established (2 to 3 years following the termination of release). This timeframe could be shortened by (1) managing native vegetation within the regeneration areas earlier in the restocking period or (2) active planting of native vegetation within regeneration areas at the time restocking is achieved.

Page 4-28, Standard No. 92:

- 23** Providing 70 percent mineral soil may be the best way to optimize conifer seed germination, however it can cause problems for wildlife and aquatic resources. Scarification of soil, followed by multi-year release management will effectively remove land from wildlife production/use for the restocking period (actually much longer, until conifers reach sufficient height to allow space for competing vegetation).

Open soil areas can also cause serious erosion and downstream sedimentation problems, when they are located on steep slopes or unstable soil types. Additional standards are needed to (1) contain erodible soil on-site, (2) prevent scarification of soil on slopes exceeding 25 percent, (3) prohibit scarification in areas where there is high risk of watershed sedimentation and (3) hasten the reinvasion of natural vegetation to benefit wildlife and soil conservation.

Page 4-28, Standard 97:

- 24** The text is unclear. Must all five criteria be met before uneven age management is permitted, or are the criteria intended only as considerations?

Page 4-29, Diversity, Standard 99:

- 25** The text is not specific about the method of measuring the five percent of each type to be retained. Is measurement based upon land area, crown closure, vegetation composition or some other parameter?

- 26** The five percent retention standard for Stage 2 (shrub/seedling/sapling) seral stage appears to be very low. Although all regeneration areas would appear to qualify for meeting this standard, we note that they would not in fact have any shrub habitat, during the required restocking period.

The standard for old growth (Stage 4C+) also appears to be very low. It will allow a large reduction in habitat, which will result in significant reductions in the numbers of many old growth-dependent species.

Page 4-30, Standard 107:

27

We recommend that the ID Team used for consideration of steep slope tractor logging should include a fishery biologist or hydrologist to evaluate the possible effects of the activity upon the downstream watershed and fishery resources. Particular care should be taken in areas having unstable soils; or which are adjacent (immediately upslope) from watersheds inhabited by threatened or endangered aquatic species.

Chapter 5.0, Monitoring and Evaluation Requirements:

28

In general, we concur with the planned monitoring activities and budgets, as planned. In particular, we support the concept of monitoring species/habitat guilds, as indicated in the table on pages 5-6 and 5-7. We suggest that guilds also be considered to represent snag/cavity dependent species, oak-chaparral species and foothill riparian species. All of these habitats would be affected by features of the Plan, as drafted.

**Memorandum**

To : Gordon K. Van Vleck  
Secretary for Resources

Date : January 8, 1987

Attn: Gordon F. Snow  
Projects Coordinator

From : Department of Fish and Game

Subject: SCH No. 86090801 Sierra National Forest Draft Land and Resource Management Plan and Draft Environmental Impact Statement

The Department of Fish and Game (Department) has reviewed the Draft Land and Resource Management Plan (Plan) and Draft EIS, as issued by the U.S. Department of Agriculture, Sierra National Forest. Herein we have addressed major areas of general agreement and concern.

29

We are guided by the California Fish and Game Commission Policy on National Forests and the Commission Policy on Land Use Planning to review, coordinate and provide comment on the consistency of this and other plans with the Department's plans, programs and other responsibilities for the State's fish and wildlife resources. While we recognize the difficulty in developing a plan of this magnitude and the multiple use constraints imposed upon the Sierra National Forest, we must point out that the Plan, as drafted, would result in long- and short-term reductions in the State's wildlife resources. It, therefore, is not generally consistent with the objectives of the Department.

The Department staff in Region 4 has provided the Sierra National Forest with substantial information and consultation pertaining to fish and wildlife resources within the Forest which are affected either beneficially or adversely by the various proposed goals, prescriptions and activities in this Plan. Recently, this has involved meetings with the Forest staff, along with the staffs of two other adjacent forests, the Stanislaus and Sequoia National Forests. This group consultation has resulted in improved understanding of the issues and proposed actions and consequently has resolved many concerns. There remain a number of significant issues which either (1) could not be resolved in the consultation process or (2) were resolved; however, (due to publication deadlines) the result could not be documented or addressed in the Draft Plan as issued. We have addressed both types of the remaining issues here, in detail, for the consideration of the Forest.

30

In this comment letter we have addressed specific issues regarding the Land and Resource Management Plan. While we have thoroughly reviewed the accompanying Draft EIS, we have not specifically referred to sections of that document. Rather, we have incorporated and considered information from the DEIS in our attached detailed comments, which we have keyed to the corresponding sections of the Plan. In general, we regard the DEIS as an adequate disclosure document.

The attached comprise our comments on the Draft Plan and DEIS, as issued. We recognize that the Forest has a difficult job of allocating land and resources among competing interests and activities. We have put a significant effort into working cooperatively with the Forest toward solutions to the many issues and we are encouraged by the progress achieved so far. We intend to continue that spirit of cooperation in an attempt to achieve our mutual, as well as our separate objectives. Our staff will be made available to the Forest, upon request, to clarify any aspect of these comments. Inquiries should be addressed to George D. Nokes, Regional Manager, 1234 E. Shaw, Fresno, CA, 93710; telephone (209) 222-3761.

  
Jack C. Parnell  
Director

Attach.

cc: Harold Cribbs, California Fish and Game Commission

Memorandum

Date : DEC -1 1986

To : A-38
Gordon F. Snow
Assistant Secretary for Resources
The Resources Agency
1416 Ninth Street
Sacramento, CA 95814

From : Department of Water Resources

Subject Sierra National Forest Management Plan (SCH 86090801)

The Department of Water Resources has reviewed the draft environmental impact statement (EIS) for the forest land and resource management plan for the Sierra National Forest. We offer the following comments for your consideration.

31

The Department is interested in the water quality and water supply aspects of the proposed plan. As indicated on page 4-80 of the EIS, increases in the base annual runoff of 2,600,000 acre-feet would range from 0.3 to 3.3 percent (8,000 to 86,000 acre-feet). Although the range of effects of the alternative plans is not great, Alternatives C, F, H, and I appear to be superior to Alternative A from the standpoint of water resources management.

The EIS indicates that runoff would vary significantly during a five-decade study, and it is possible that the higher runoff would occur during wet years and that decreases or small increases would occur during dry years. The reliability of the increased yield would be improved if the management plan included a policy to coordinate timber harvest, reforestation, fuel management, and range improvement to maintain the annual amount of increased yield as nearly constant as possible. Unless such reliability is assured, the increased yield may have little value for surface water supply or hydroelectric energy.

Sediment is the major cause of water quality impairment and, when trapped by reservoirs, can diminish dependable water supplies and hydroelectric energy production. Protection of reservoirs from undue sedimentation should be a top priority for watershed management and is a prospective benefit of this plan that should be considered in the economic analysis of the alternative forest plans.

32

On page 3-92, in reference to water yield increase by forest management projects, the EIS states, "If allowed to flow off-site during the dry season, much of this water is consumed by riparian vegetation." We believe this statement should cover the following points: (1) if the flow occurs during the wet season, it may not be usable and at certain times may have an accumulative effect on floodflows and (2) the use of this water by downstream riparian vegetation is considered a beneficial use by persons concerned with maintaining wildlife habitat.

Gordon F. Snow  
Page 2  
DEC -1 1986

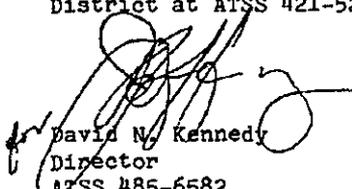
**33**

There are discrepancies in the discussion of environmental consequences on water yield. The paragraph on page 4-81 preceding the tabulation of total water yield increases for each alternative states that the figures in the tabulation are based on data in Table 4.19. Table 4.19, however, includes information on only two decades. The percentages in the tabulation seem to be based, instead, on data in the tables entitled "Average Annual Outputs During First Five Decades" which are presented in Chapter 2.

**34**

In the discussion of Alternative C on page 4-81, the average annual increase in water yield should be changed from 0.3 to 2.3 percent. Also, in that same sentence, the increase at the end of decade 5 should be changed from 9,000 to 41,000 acre-feet.

If you have any questions in this regard, please telephone Ken Turner of our Division of Planning at ATSS 485-7565 or Bob Figueroa of our San Joaquin District at ATSS 421-5236.

  
David N. Kennedy  
Director  
ATSS 485-6582

Resources Building  
1416 Ninth Street  
95814  
(916) 445-5858  
TDD (916) 324-0804

California Conservation Corps  
Department of Boating and Waterways  
Department of Conservation  
Department of Fish and Game  
Department of Forestry  
Department of Parks and Recreation  
Department of Water Resources

GEORGE DEUKMEJIAN  
GOVERNOR OF  
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA  
SACRAMENTO, CALIFORNIA

Air Resources Board  
California Coastal Commission  
California Tahoe Conservancy  
California Waste Management  
Board  
Colorado River Board  
Energy Resources Conservation  
And Development Commission  
San Francisco Bay Conservation  
and Development Commission  
State Coastal Conservancy  
State Lands Division  
State Reclamation Board  
State Water Resources Control  
Board  
Regional Water Quality  
Control Boards

Mr. James Boynton  
U.S. Forest Service  
1130 O Street  
Fresno, CA 93721

January 12, 1987

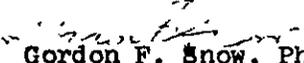
Dear Mr. Boynton:

The State has reviewed the Draft Land and Resources Management Plan and EIS, Sierra National Forest, submitted through the Office of Planning and Research. Review of this document was coordinated with the Reclamation Board, State and Regional Water Boards, and the Departments of Boating and Waterways, Conservation, Fish and Game, Forestry, Parks and Recreation, Water Resources, Health Services, and Transportation.

Attached for your consideration are comments received from the Departments of Fish and Game, Forestry, and Water Resources. These constitute the State's response regarding the subject documents at this time.

Thank you for providing an opportunity to review this project.

Sincerely,

  
Gordon F. Snow, Ph.D  
Assistant Secretary for Resources

Attachments (3)

cc: Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

(SCH 86090801)

STATE OF CALIFORNIA  
Office of Planning and Research  
Department of Fish and Game

RESPONSES:

1. The Forest appreciates comments from the State Department of Fish and Game. As directed by Congressional act, river management plans will also have to be completed for the newly designated Merced, South Fork Merced, Kings, South Fork Kings, and Middle Fork Kings Rivers. Your developed fisheries management plans for these designated rivers can be coordinated within future Forest river management plans. The details can be worked out at the project level of planning.

2. Yes, opportunities exist to repair past damages. Please see Section 4.0 of the Plan for a description of our intent to complete annual fishery habitat improvements. Aside from using project management dollars and funding from outside sources, the Forest identifies habitat improvement projects included in timber sale packages on a continuous basis with K-V dollars. Our description of low quality aquatic habitat has been modified to more clearly describe areas that do not provide much fish habitat: stream segments that 1) flow subsurface during dry years, 2) experience high summer water temperatures from low flows (detrimental to trout), or 3) are so remote that habitat improvement costs would be prohibitive.

3. Timber harvesting is one of the Forest's multiple uses. Adoption of your suggestion would result in little or no timber cutting, depriving the public of this valuable commodity. However, substantial areas of mixed conifer old-growth, will be retained in SOHAs, riparian areas, retention zones, and wilderness.

Species composition will remain unchanged in both the ponderosa pine and red fir types. However, the mixed conifer type will change, with less white fir and sugar pine in the stands. White fir has increased from lack of fire. White pine blister rust has all but eliminated sugar pine in the stands. Our regional genetics group is presently identifying superior, resistant trees to resolve this problem. A decrease is anticipated in the 4c stage in both the ponderosa pine and red fir types by the fifth decade because of the present age of the stands. A slight increase in the mixed conifer type, resulting from intensive treatment, allows the trees to grow to the 4c stage more quickly.

4. Regional direction and Forest Service policy require management of sensitive plants and their habitats to prevent them from becoming federally-listed as threatened or endangered. The Forest is directed to provide long-term protection by developing Species Management Guides until they are removed from the sensitive plant lists. Direction is not repeated in the Plan. Sensitive plant inventories are expected to be completed before the next revision of this document. This is a continuing process because the

Regional Forester's sensitive plant list is periodically revised.

5. The Plan and final EIS state that habitat should be managed to maintain or improve present fish and wildlife populations. No species can be placed in jeopardy. Therefore, our S&Gs state that all species will be maintained to at least self-sustaining levels.

6. S&Gs listed in the final EIS and the Plan describe the protection to be given to riparian areas and streams. Riparian area protection and streamside management zones are based on methods described in the Forest Service Handbook 2509 22, Sierra Supplement 1. At the project level, stream class ratings, SMZ widths, and minimum ground cover densities are designed to protect the quality of streams.

7. S&Gs for riparian areas have been modified to better protect wildlife habitat. If grazing adversely impacts Willow flycatcher habitat, protection measures, such as the regulation of the timing and distribution of grazing, and structure controls, will be planned and implemented.

8. The "sensitive species" include Willow flycatcher, Goshawk, and Spotted owl, raptor and some mammals. The Forest plans to protect Willow flycatcher nests through implementation of the S&G found in the riparian section of the Plan. Our strategy for protecting Goshawks and Spotted owls includes allocating over 20,000 acres of suitable habitat outside of wilderness. This measure, along with protecting occupied nest sites, will assure the continuation of viable populations of all sensitive species.

9. Thank you for your support.

10. The present distribution of snags is uneven. Some timber compartments are below the recommended density, while others have a snag density exceeding the standard. As the Plan is implemented, the snag density will be more evenly distributed. It is anticipated that this change in snag distribution will maintain the population of primary cavity nesting birds near current levels. Refer to Jack Ward Thomas' Wildlife Habitats in Managed Forests, the Blue Mountains of Oregon and Washington, USDA Forest Service Ag. Handbook #553, September 1979.

11. We agree with your comment on assessing snags on a site by site basis. As projects are planned, districts will be required to meet the snag standards on a competent level. Both location, species, and site of snags will be documented as part of the project planning process. No specific snag management areas will be included into the Final Plan. However, snags will be allowed to occur naturally in special management areas, such as Spotted Owl Habitat Areas (SOHAs), geological areas, archeobiological sites, etc.

12. S&G 46 in the Draft Plan has been rewritten.

13. The oak retention standards for critical and noncritical deer habitat is a balance between meeting the needs of wildlife and the needs for other uses of the hardwood resource. The ID team feels this balance was reached and the standards will meet the needs of all oak dependent species. The Forest will manage oaks in timber sale harvest units which normally will not exceed 40 acres in size.
14. Riparian S&Gs have been revised to better reference our use of the FSH 2509.22, Sierra Supplement 1 that establishes SMZ requirements for Class I, II, and III streams.
15. See our revised S&Gs in the final EIS and Plan that describe our riparian management commitments and strategies. On a project level basis, our riparian area protection and SMZ determinations are based on methods described in FSH 2509.22, Sierra Supplement 1, which takes into account stream class, side slope corrections, percent of ground cover, equipment operation, and various other topics. At a recent Forest ID Team meeting, it was decided to keep a minimum annual scheduled harvest in the regulated timber base. The Management emphasis will be the control of insect and disease and the maintenance of riparian dependent resources.
16. Wet meadows will be managed using standards for Class I streams. The most recent changes made to them include many of your suggestions.
17. Several S&Gs have been added to the riparian section of the Plan, giving emphasis to repairing, protecting, and enhancing the riparian ecosystem. As problems such as you describe are identified, they are prioritized and scheduled for repair, often at considerable permittee expense.
18. Grazing allotments contain range improvements, including fences, to control livestock movements and manage the forage resource. Many improvements have been in place for years and identified needed improvements are funded through Range Betterment Funds on a priority basis.
19. Decisions to permit increased AUMs will be based on forage conditions. Our records indicate the annual grass range has improved substantially over the past 30 years and can readily accommodate additional AUMs.
20. The Forest agrees there is a potential for cattle to adversely compete with deer prior to mid-January. Grazing seasons are being actively adjusted to comply with State recommendations.
21. It normally takes a minimum of ten years for a plantation to become fully stocked with trees 4 1/2 feet tall. Provided we were totally successful with our release efforts, browse would have at least seven years of growth prior to the harvest of an adjacent stand.
22. The Forest intends to follow your recommendation within selected deer holding and population centers by managing regeneration areas as openings. Native vegetation would have at least seven years to become established as the trees grow toward 4 1/2 feet.
23. Management practices are generally used that do not leave open areas that can cause serious erosion and downstream sedimentation problems. In areas with steep slopes or unstable soil types, site recommendations generally are to leave a minimum of 50% effective ground cover, with possible increase to 70%. Recommendations on the amount of ground cover to leave are based on research and knowledge of local soils. As indicated in the Order 3 Soil Survey Report, the erosion hazard drops from high to moderate at about 35% slope. The Forest does not generally scarify a site unless natural regeneration is the management prescription, and then only if BMPs can be met and soil productivity maintained. Natural vegetation is encouraged where it does not compete with seedling establishment and growth. Restocking sites with natural tree species immediately after cutting is a priority for continued protection of the watershed.
24. This S&G has been deleted. Uneven-age management will be the preferred silvicultural system on 25,000 acres of CAS lands.
25. The 5% is by land area.
26. The 5% retention standard for Stage 2 seral stage and oldgrowth are regional minimum requirements. In the Plan, projections exceed these minimums for shrub and oldgrowth seral stages in every decade during the 50-year extended Plan.
27. ID teams are developed for each proposed timber sale. The ID teams are composed of resource specialists representing the issues and concerns identified for each project. If it is determined that there is a significant concern for the watershed, a fisheries biologist or hydrologist is included on the ID team. A fishery biologist or hydrologist will always be an ID team member when timber sale activity is proposed in watersheds inhabited by threatened or endangered aquatic species.
28. Thank you for your support. Your concerns for guilds should be eliminated by our monitoring effort. The Forest staff will monitor guilds in mature mixed conifer, meadow edge, oak woodland, and riparian habitats. The habitats you mentioned are components of these.

#### DEPARTMENT OF FISH AND GAME

29. The Preferred Alternative may not meet all the objectives of the Department. The Plan displays what the Forest considers to be the best mix of activities, outputs, and amenity values to benefit the public in the long run.

30. The Forest appreciates the interest that the CDFG has shown in our planning effort. The staff agrees with a number of your suggestions and incorporated them into the final Plan. The Forest will continue to work with the Regional Manager and his staff to ensure the cooperation displayed during the planning effort continues.

#### **DEPARTMENT OF WATER RESOURCES**

31. If the only important consideration of the Plan is water yield, then Alternative C, F, H and I would be better than Alternative A. This is not the case. Through Alternative A, the Forest tries to meet the needs to protect and enhance all resources.

32. The statement refers to an increase in water yield and not an increase in runoff. Your point regarding the value of water to riparian vegetation is well taken, and a discussion of the topic is included in the final EIS.

33. These corrections in the Appendix have been made. Percentages were determined from Table 4.19 by the differences of yield at the end of decade five and the best year value of 2.6 MM acre/feet.

34. These changes you suggested have been made.

**Public Works & Development Services Department**Richard D. Welton  
Director

January 9, 1987

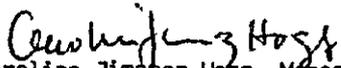
Mr. James L. Boynton, Forest Supervisor  
Sierra National Forest  
1130 "O" Street  
Fresno, California 93721

Dear Mr. Boynton:

Subject: Proposed Forest Land and Resource Management Plan - Sierra  
National Forest

Please include the enclosed December 16, 1986, resolution of the Fresno County Board of Supervisors in the record of public comment for the proposed Forest Land and Resource Management Plan - Sierra National Forest. The Board's resolution supporting the proposed Plan (Alternative "A") increasing annual allowable timber sale quantities from 125 MMBF (million board feet) to 152 MMBF recognizes the importance of the timber industry employment and revenues to Fresno County.

Sincerely,

  
Carolina Jimenez-Hogg, Manager  
Community Development & Planning Division

CJH:MJD:ah  
6351C-52

Enclosure

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BEFORE THE BOARD OF SUPERVISORS  
OF THE COUNTY OF FRESNO  
STATE OF CALIFORNIA

IN THE MATTER OF THE PROPOSED ) FOREST LAND AND RESOURCE ) MANAGEMENT PLAN - SIERRA ) NATIONAL FOREST )	RESOLUTION SUPPORTING INCREASED TIMBER HARVESTS AND INCREASED FUNDING FOR MANAGEMENT OF SIERRA NATIONAL FOREST
--	--

WHEREAS, on December 8, and December 16, 1986, the Fresno County Board of Supervisors met to discuss the proposed U.S. Forest Service Forest Land and Resource Management Plan -- Sierra National Forest; and

WHEREAS, representatives of the U.S. Forest Service summarized the market alternative (Alternative "H") and their recommended alternative (Alternative "A"); and

WHEREAS, public testimony was received from building industry and timber industry representatives in support of Alternative "A", modified to allow harvesting of 152-160 MMBF of timber, as allowed under the present Plan, instead of 125 MMBF as provided for under Plan "A"; and

WHEREAS, it is recognized that the timber industry has a major impact on Fresno County jobs and revenues; and

WHEREAS, information considered at the meetings indicated that the Sierra National Forest can be effectively managed to produce 152-160 MMBF without serious impacts on other resources, although the Forest Service has indicated additional funding for their operations may be necessary for such production.

NOW, THEREFORE, BE IT RESOLVED that the Fresno County Board of Supervisors hereby requests that the U.S. Forest Service adopt a plan which provides for the yearly harvesting of 152 MMBF of timber, with the remainder of the Plan to be identical with Alternative "A"; and

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BE IT FURTHER RESOLVED that the Fresno County Board of Supervisors supports increased funding of the U.S. Forest Service budget so that the Sierra National Forest can be managed more effectively and efficiently.

THE FOREGOING was passed and adopted by the following vote of the Board of Supervisors of the County of Fresno this 16th day of December, 1986, to-wit:

AYES: Supervisors Andreen, Conrad, Ramacher, Koligian

NOES: None

ABSENT: Supervisor Levy

*Dora Koligian*  
CHAIRMAN, Board of Supervisors

ATTEST:

SHARI GREENWOOD CLERK,  
Board of Supervisors

By *S. Greenwood*  
~~Deputy~~

STATE OF CALIFORNIA )  
COUNTY OF FRESNO )  
I, SHARI GREENWOOD, Clerk to the Board of Supervisors of said County and State, do hereby certify the foregoing to be a full, true and correct copy of the original thereof on file in my office.  
Witness my hand and Seal of said Board, this *21<sup>st</sup>* day of *Dec*, 19*86*  
  
Clerk, Board of Supervisors  
By *S. Greenwood* Deputy Clerk

File #7006  
Agenda #16  
Resolution #86-591

**FRESNO COUNTY  
COMMUNITY DEVELOPMENT AND PLANNING  
DIVISION**

**RESPONSE:**

1 Your preference for increasing the ASQ to 152MM was considered during our final analysis. There are trade-offs between the higher levels of timber production in Alternatives C and H and the Preferred Alternative. These trade-offs include effects on fish, wildlife, soils, water, riparian zones, visual and recreational resources, local employment and local government finances. All of these are described in the EIS and were considered in our analysis

Your letter and many others stated that current levels of harvest are too low, and if the ASQ was not raised to approximately 152 MMBF, the revenues and employment in Fresno County would decline

Other respondents gave diverse reasons why the ASQ under the Preferred Alternative was too high. They claim the budget needed to produce this level of harvest is

unrealistically high, and gives an undesirable subsidy to the timber industry because revenues would not cover costs to the government. There were strong objections to using pesticides, clearcutting and harvesting timber on marginal timber land. They point out the potential adverse effects of timber harvest on resources such as Soils, Watershed, Wildlife habitat, and Riparian zones. They request more land be assigned to resources other than timber production. Timber industry advocates claim the amount in the Preferred Alternative is insufficient to support mill operations at levels like those favorable to conditions experienced in 1986, 1987, and 1988. Should favorable market conditions continue for an extended period, uncut timber under contract will continue to decline and this will lead to increased competition and prices.

The views on ASQ are divergent. Some argue for jobs, families, and businesses, while others argue for soil, fish, wildlife, riparian zone, and visual quality. Our responsibility is to weigh all values and needs and select an ASQ that provides a balance between maximizing timber production on lands capable and suitable for growing timber and protecting other values and resources. The Forest has confidence the final ASQ meets this balance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca 94105

Zane G. Smith, Jr.  
Regional Forester  
Pacific Southwest Region  
USDA, Forest Service  
630 Sansome Street  
San Francisco, CA 94111

Dear Mr. Smith:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled SIERRA NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN, MARIPOSA, MADERA AND FRESNO COUNTIES, CALIFORNIA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because projected Forest activities may result in degradation of riparian areas, water quality and beneficial uses. Further discussion is needed on how conflicts between proposed activities and protection of the Forest's resources will be resolved. A summary of EPA's comments and classification will be published in the Federal Register.

We appreciate the opportunity to review this DEIS. Please send 2 copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact David Powers, Federal Activities Branch, at (415) 974-8193 or FTS 454-8193.

Sincerely yours,

A handwritten signature in cursive script that reads "Charles W. Murray, Jr.".

Charles W. Murray, Jr.  
Assistant Regional Administrator  
for Policy and Management

Enclosure (5 pages)

Water Quality Comments:

1. The DEIS and Forest Plan indicate that the Best Management Practices (BMPs) listed in the Forest Service Handbook and Appendix E of the Forest Plan are the means for protecting water quality in the Sierra National Forest. The 1981 Management Agency Agreement between the State Water Resources Control Board (SWRCB) and the Forest Service certified that the BMPs developed in the §208 Plan would constitute sound water quality management and that implementation of these practices would constitute compliance with substantive and procedural requirements of state water pollution control law as mandated by §313 of P.L. 95-217. It should be noted, however, that implementation of BMPs does not constitute compliance with water quality standards per se. In the event that a Forest project, undertaken with or without appropriate BMPs, creates a water quality problem or causes a standards violation, the State and Regional Boards retain the authority to carry out their responsibilities for management of environmental quality.
2. The Watershed Improvement Needs (WIN) list on page 3-91 of the DEIS identifies the 10 most important water quality problem sites including the site locations and number of acres affected. The WIN list should be expanded to include the remaining 48 sites which have watershed problems. The list should also show how restoration priorities and target deadlines would differ under the various alternatives.
3. The FEIS should address compliance with the California Antidegradation Policy. This policy states that "where the existing quality of the water is better than the standards set, that such existing high quality will be maintained until it has been demonstrated to the State that any change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses of such water and will not result in water quality less than that prescribed in the policies." This policy is reiterated in Federal regulations (40 CFR 131.13(a.2)). The FEIS should evaluate the projected degradation of water quality due to cumulative watershed impacts from prescribed burning, firewood gathering, new road and trail construction, grazing, mineral extraction, dam construction/operation and recreation, in terms of the Antidegradation Policy.

- 4** 4. Page 3-106 of the DEIS states that the Forest's resources in conjunction with several other factors "allow an infinite number of hydroelectric developments to exist." Hydropower development may conflict with other Forest resources. Hydropower projects alone or in combination with other hydropower projects may have a detrimental effect on riparian areas and riparian dependent uses such as cold water fisheries. As the DEIS (p. 3-54) states, "Riparian areas protect water quality by filtering sediment and providing vegetation for streambank stability..." and "...are among the most important wildlife habitats on the Forest." Hydropower projects may also cause changes in temperature, dissolved oxygen, and instream flows, changing existing beneficial uses. The FEIS should discuss the regulatory process for justifying changes in beneficial uses. In addition, the FEIS should describe the process that the Forest Service will use to insure that Federal Energy Regulatory Commission recommended mitigation for projects will be adequate to protect water quality and beneficial uses.
- 5** 5. The Forest Plan (p. 4-36) states that "For an Environmental Assessment, cumulative effects for more than one project are to be addressed in the drainage in which they occur, starting from the last point on the stream where any impacts may cease or are not evident and include all the area above it in the major drainage." Although EPA commends the objective of this Standard and Guideline (S&G), it may not be sufficient to assess the cumulative impacts to water quality and beneficial uses resulting from hydropower development. For example, the loss of spawning habitat may occur below hydropower projects because diversion structures impede the transport of spawning gravels. Another problem with this S&G is that it may fail to assess impacts which do not seem evident on a given reach but which are significant when added to the incremental impacts occurring over the entire watershed. EPA recommends that hydropower Environmental Assessments (EAs) consider the potential impacts both above and below project sites. We believe that the scope of cumulative effects EAs should be watershed or basin-wide.
- 6** 6. Page 3-107 of the DEIS states that mitigation for hydropower projects may consist of "replacement of a different resource to affect several types of resource losses. Some resource losses can never be fully mitigated..." This may result in exchanges of cold water fishery habitat for lake fishery habitat, constituting changes in existing beneficial uses and the possible lowering of standards for turbidity, temperature and dissolved oxygen in otherwise high quality waters. In such cases the Antidegradation Policy applies and requires an antidegradation analysis to support the lowering of standards and the changing of beneficial uses.

7. EPA commends the S&G which will "seek flows and habitat more favorable to fish and wildlife" during the relicensing of hydropower projects where obvious degradation has occurred (Forest Plan p. 4-23). The estimated 215,300 visitor days spent on cold water fishing in 1983 (Forest Plan p. 3-7) indicate the importance of creating additional fishing opportunities within the Forest.
8. EPA commends the S&G which will "give primary management consideration in riparian zones to fish, wildlife, and water quality" (Forest Plan p. 4-25). We recommend the use of cold water fish and benthos as the primary indicators of riparian and watershed health. Pages 5-4 and 5-5 of the Forest Plan show a monitoring plan for population trends of resident rainbow trout which will use a 20% reduction in base population to indicate that further management action is required. The FEIS should describe whether the reduction will be based on a forest-wide, watershed or stream reach basis and whether the 20% reduction "standard" is acceptable to the California Department of Fish and Game (CDFG). Will monitoring be coordinated with CDFG?
9. BMP assessment will include visual observations and random sampling analyses to determine changes in water quality (Forest Plan p. 5-9). The FEIS should indicate the percentage of projects which will be monitored in this way.
10. Page 4-3 of the DEIS indicates that under the Preferred Alternative there will be a moderate increase in the need for additional community services. The FEIS should define what is meant by moderate and discuss planned additions to existing sewer and water facilities.
11. Although the Forest Plan (p. 4-29) indicates that secondary utilization of timbering byproducts will be the preferred method of disposal, it may not preclude the necessity for on-site disposal. The FEIS should discuss provisions which will prevent slash, fuels and other timbering byproducts from entering waterways if on-site disposal is required.
12. The Sierra National Forest predicates its timber yield and yield production costs on the selection of the Preferred Alternative of the 1983 Vegetation Management for Reforestation DEIS (DEIS p. 2-30). The types of herbicides proposed for use in the Eldorado National Forest and the number of acres on which those herbicides will be used annually should be discussed in the FEIS. In addition, the FEIS should discuss the process for developing environmental documents such as cumulative impact analyses of herbicide projects and site-specific environmental assessments. This discussion should include the processes for public notification, comment and appeal. Finally, the FEIS needs to discuss S&Gs for the protection of municipal water supply watersheds.

- 13** 13. Page 3-56 of the DEIS indicates that 5% of the available primary range is in poor quality. The FEIS should indicate the amount of secondary range in poor condition or in a downward trend. The locations targeted for range improvement activities and the target dates for completion of those activities should also be included in the FEIS.
- 14** 14. The DEIS indicates that the use of vegetation type conversions for grazing will increase under the Preferred Alternative. The FEIS should discuss how the shift to transitional range may increase conflicts with wildlife and increase impacts on upland and ephemeral stream channels.

Air Quality Comments:

- 15** EPA commends the explanation of air quality problems in the Forest as well as the description of expected increases in sources of pollution. However, the DEIS fails to address expected air quality deterioration for the alternatives considered. The FEIS should discuss mitigation, including detailed measures to minimize air quality degradation from burning activities, road dust and vehicle emissions. The FEIS should specifically address protection of air quality in Class I Wilderness areas.

