

BACKCOUNTRY HORSEMEN OF CALIFORNIA

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Sierra Nevada Forest Plan Amendment DSEIS
P.O. Box 221090
Salt Lake City, UT 84122-1090

REGARDING: BCHC comments on Draft Supplemental Environmental Impact Statement for the SNFPA

Impacts to recreation through revisions of the standards and guides have not been addressed as promised by the Regional Forester.

Regional Forest Blackwell stated and promised the following: “We are also sensitive to the concerns from recreationists that the Sierra Nevada Forest Plan Amendment restricts their access to national forest lands. We will review standards and guidelines as to their effects on developed ski areas, recreation residences and other recreation uses. We will engage home owners associations, off road vehicle groups, the ski industry and others to assure that we have carefully considered their concerns.” As stated in the DSEIS, the chartered Review Team was “*to identify opportunities to... reduce the unintended and adverse impacts on recreation users and permit holders.*”

The DSEIS only clarifies that **some** of the limited operating periods apply to vegetative treatments only and not to recreational activities. There are many stands and guides that will cause a significant impact on recreational activities.

When examining the Standards and Guidelines in Appendix A all kinds of red flags go up. We have concern about the Aquatic/Riparian areas, which include RCA’s CAR’s guided by the RCO and ACS goals. There are no acreages identified for these areas. This is important because the more the acres, the greater the impact to recreational users.

Below are some Standards and Guidelines in Appendix A that will cause problems for recreational users.

1. Pg. 253 – *During landscape analysis, review existing uses and activities in CAR and RCAs and implement actions to attain AMS goals. (Love those Acronyms!) Where actions, such as increasing education, limiting or redirecting use, adding traffic control devices, increasing maintenance, relocating facilities, and/or closing specific sites, are not effective in meeting AMS goals, eliminate the practice or occupancy. This is a very all inclusive guideline. Consequences to recreation dependent on acreages in CARs and RCAs and what AMS goals are.*
2. Pg. 254 – *Maintain and restore hydrologic connectivity of steams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity. No specifics are given as to the “corrective actions” means.*
3. Pg. 255 – *Prevent disturbance to meadow-associated stream banks and natural lake and pond shorelines cause by resource activities (for example, livestock, off-highway vehicles, and dispersed recreation)...Implement corrective action where disturbance limits have been exceeded. Given that “disturbance” cannot exceed 20% of stream reach or 20% of natural lake and shorelines, what are the corrective actions to be taken?*
4. Pg. 256 – *For waters designated as “Water Quality Limited” (Clean Water Act Section 303(d)), implement appropriate State mandates for the water body, such as Total Maximum Daily Load (TMDL) protocols. Does this apply to stream turbidity? If yes, are stock activities considered a source of turbidity? Again, this is not quantified so that we are able to determine the level of impact.*
5. Pg. 259 – *Assess roads, trails, OHV trails and staging areas, developed recreation sites, dispersed campgrounds, special use permits, grazing permits, and day use sites during landscape analysis...If inconsistent, modify through redesign, rehabilitation, relocation, closure, or redirecting the use to a more suitable location. When is the “landscape analysis” to be done? Is it at a watershed level or a forest level? There are lots of references to this activity but no other information on size of area in “landscape” and no schedule.*
6. Pg. 261 – *Exclude livestock (including pack and saddle stock) from standing water and saturated soils in wet meadows and associated streams and springs occupied by Yosemite toads or identified as “essential habitat” in the conservation assessment for the Yosemite toad...If physical exclusion of livestock is impractical, then exclude grazing from the entire meadow. This could be a big problem. We request the “conservation assessment for the Yosemite toad” because we need to know how many meadows are affected are where they are. Is the schedule for the surveys for the Yosemite Toad two years from date of original ROD or the new ROD resulting from the Supplement?*
7. Pg 261 – *During landscape analysis, evaluate and consider relocating existing livestock facilities outside of meadows and riparian areas. We have many fenced meadow areas in the wilderness that are for grazing our pack and saddle stock. If our fenced areas are considered “facilities” we may loose them.*
8. Pg. 274 – *SN Red Fox and Wolverine, Conduct an analysis to determine if activities within 5 miles of the detection have a potential to affect the species. Implement a limited operating period from January 1 to June 30 to avoid adverse*

- impacts to potential breeding.* It appears that this “limited operating period” is not limited to vegetative treatments. Please verify intent.
9. Pg. 284 – *Willow Flycatcher, Evaluate proposals for new concentrated stock areas (e.g. livestock handling and management facilities, pack stations, equestrian stations, and corrals) within five miles of occupied willow flycatcher habitat.* This will impose an unreasonable level of review and cost when new trail heads or corrals are requested.
 10. Pg. 285 – *Fisher, Protect verified fisher birthing and kit rearing dens from March 1-June 30 with 700-acre buffers...* AGAIN, this does not appear to be directed toward vegetative activities. See next point. A biologist noted to me that mother fishers move their kits daily and therefore do not have established dens. What does the FS know about this? Where are the “verified” dens located?
 11. Pg. 286 – *Protect den sites from disturbance due to roads, trails, off highway vehicle routes, recreational developments and other developments. Evaluate on-going and proposed activities with in fisher den site buffers and take action to minimize the potential for disturbance to den sites.* What does “take action to minimize” mean? We are taking about a 700 acre area. That’s a lot of ground. Sounds like an action to minimize might be an LOP.
 12. Pg. 292 – *Owls, Goshawk - Mitigate impacts where there is documented evidence of disturbance to the nest site from existing recreation, off highway vehicle route, trail, and road uses.* Seems that the way to “mitigate” is to institute an LOP which the document states will apply only to vegetative treatments

The McNally Fire on the Sequoia National Forest burned over 150,000 acres, destroyed trails, watersheds, inundated streams with soil and dead vegetative material and destroyed wildlife habitat. We have concerns that fuels treatments are not at an appropriate pace and scale to prevent the devastation of large areas of the Sierra Nevada Bioregion to catastrophic fire. We also note that there is no discussion of beetle infestation that has devastated the San Bernardino Forest and the surrounding communities. The FS has not gone far enough to address the fuels build-up in the forest. The limiting factor is the diameter tree that can be cut and the number of “snags” left for habitat reasons. Even though the new Plan is better than the previous plan, S1 vs. S2, the Forest Service still has a catastrophic problem on their hands.

The 30 inch rule for harvesting is too limiting and slows the ability of the FS to afford fuels reduction projects. Alternative 4 in the FEIS allows for the needed flexibility to address each area treated and supports the production of merchantable timber that will allow an accelerated pace of fuel reduction projects.

Respectfully Submitted,

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9/15/2003

Cc: Mark Rey, Under Secretary, USDA Natural Resources and the Environment
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