

Key Talking Points for the Sequoia and Sierra Revised Draft Forest Plans

Alternative C is the most protective and conservation-oriented alternative. The revised draft Sequoia and Sierra Forest Plans are analyzed in the Revised Draft Environmental Impact Statement (RDEIS) as the Preferred Alternative B. CalWild urges the public to support Alternative C with the changes noted below. Alternative C recommends far more wilderness protection, proposes more acres of forest restored through prescribed and managed fire, and more riparian and meadow restoration than Alternative B.

Wilderness Recommendations

What's Good: The revised draft plans identify more than 800,000 acres of wilderness-quality lands across the two forests. The conservation-oriented Alternative C recommends over 452,000 acres of new wilderness. The new Alternative E also creates a Backcountry Management Area designation for roadless lands not recommended as wilderness. However, the Forest Service's preferred Alternative B only adds a paltry 4,900 acres of new wilderness on the Sequoia NF and recommends no new wilderness on the Sierra NF despite hundreds of thousands of eligible acres.

Significant Improvements Needed:

- The Forest Service should strengthen Alternative B to include more recommended wilderness areas on both forests, with an emphasis on low-elevation areas not typically protected by the wilderness system (see below for specific areas).
- Both plans should also apply Alternative E's Backcountry Management Area designation to protect roadless areas not recommended for wilderness protection.
- **Sequoia National Forest:** Recommended wilderness areas should include the Golden Trout Wilderness Addition, Stormy Canyon, Oat Mountain, Cannell Peak, and the Domeland Wilderness West Addition, using boundaries developed by conservation groups to reduce conflicts with motorized and mountain bike trails (as displayed in Alt. E).
- **Sierra National Forest:** Recommended wilderness areas should include the Kings River-Monarch Wilderness Addition, Sycamore Springs, San Joaquin River-Ansel Adams Wilderness Addition, Bear Mountain, and Devil Gulch-Ferguson Ridge, using boundaries developed by conservation groups to reduce conflicts with motorized and mountain bike trails (as displayed in Alt. E).

Wild & Scenic Rivers

What's Good: The Sequoia National Forest's inventory of eligible rivers and streams was substantially improved in the 2019 draft plan. Eligible river miles increased from 75 miles in the 2016 draft plan to 341 miles in response to public comments. However, the Sierra National Forest's inventory is a huge step backwards: eligible wild & scenic river (WSR) miles decreased by more than 500% from 640 miles in 2016 to just 35.5 miles in 2019. Public comments should commend the Sequoia NF for their expanded inventory and express concern about the substantially reduced WSR inventory on the Sierra NF. The eligible Wild & Scenic River inventory remains the same throughout all the alternatives.

Significant Improvements Needed:

- The draft plans should take a watershed approach to identifying eligible rivers and streams by identifying full streams as eligible rather than disconnected segments.
- **Sequoia National Forest:** The Forest Service should recognize additional eligible rivers including the North Fork Middle Fork Tule River and Rattlesnake Creek (North Fork Kern tributary).

- **Sierra National Forest:** The Forest Service should recognize additional eligible rivers including all 30+ miles of Dinkey Creek, the lower South Fork San Joaquin, the main San Joaquin below Mammoth Pool and Redinger dams, Granite Creek and Iron Creek (South Fork Merced tributary).

Fire Management

What's Good: The draft plans allow for prescribed fire and naturally-ignited wildfire managed for resource benefits, when conditions are right, across the landscape. The plans also recognize the benefits of prescribed fire on long-term smoke emissions and emphasize collaboration with air regulators to increase pace and scale of fire restoration.

Improvements Needed:

- Set objectives for fire restoration that match the ecological need of the landscape. Triple the amount of ecologically beneficial fire to 279,000 acres over the next 15 years.
- Include a realistic plan to increase prescribed fire capacity by establishing wildland fire crews solely dedicated to supporting prescribed fire rather than fire suppression.
- Increase focus on reducing surface and ladder fuels and using prescribed and managed wildfire as the primary fuels reduction and forest restoration tools.

Old Forests and Complex Early Seral Forests

What's Good: The draft plans recognize the ecological importance of mixed-severity fire in shaping the landscape.

Significant Improvements Needed:

- Adopt Alternative C's 24" diameter limit across the landscape to better protect old forest habitat with a focus on removing surface and ladder fuels.
- Include restrictions on salvage logging to protect most of the complex early seral habitat that is created by fire and other disturbances.
- Include standards and guidelines for snag recruitment and retention.

Wildlife Species At-Risk

What's Good: Northern goshawk has been added as a Species of Conservation Concern. Protected areas have been added for great gray owl and northern goshawk. The approach to California spotted owl and fisher conservation has been improved but remains inadequate to support population viability. The plans now recognize that logging and grazing are threats to some at-risk species. Protections for Yosemite toad have been very much improved.

Significant Improvements Needed:

- Protect more high-quality habitat (dense, large structured forests) for old forest dependent species like spotted owl, Pacific fisher, Pacific marten, great gray owl and northern goshawk.
- Add standards and guidelines to increase habitat quality of meadows historically occupied by willow flycatcher and ensure high quality meadow foraging habitat is provided for reproductive great gray owls.

- Add conservation measures for species considered at-risk by experts and wildlife agencies; these include black-backed woodpecker and western pond turtle.
- Follow all recommendations made by scientists in the Fisher Conservation Strategy, including a 24" diameter limit.
- Add standards and guidelines, especially for logging and grazing, to ensure that habitat quality for at-risk species will maintain population viability or contribute to recovery.

Aquatic and Riparian Ecosystems

What's Good: The draft plans establish five Conservation Watersheds (2 on Sierra NF and 3 on Sequoia NF) to provide for continued high-quality water sources and the long-term persistence of at-risk species. Improvements were made to protections for riparian areas, meadows, and special aquatic features. Riparian areas now not considered part of the timber base.

Significant Improvements Needed:

- Add the Critical Aquatic Refuges identified in Alternative C to protect areas of high biodiversity and aquatic/riparian species that are at-risk.
- Adopt a standard that does not allow management actions, e.g., grazing, to impede the recovery of a meadow or other special aquatic feature.
- Eliminate grazing in meadows that are degraded, poorly functioning, or that sustain at-risk species.
- Remove standard that allows 20% of a fen to be disturbed and eliminate grazing and other human-caused disturbance from seeps, springs, fens, and other special aquatic features.
- Increase number and acreage of meadows improved or restored.

Recreation

What's Good:

- The draft plans recognize the importance of high quality forest recreation and the need for sustainable recreation opportunities that can be maintained into the future without harming the land. The draft plans recognize changes in use of recreation on the forests and the need for partnerships to sustainability manage recreation. In an attempt to better address emerging recreational interests, the plans also revise the Recreational Opportunity Spectrum.

Significant Improvements Needed:

- Provide quantifiable visitor use levels for each type of recreation and projections of how these levels would be affected by declining federal budgets.
- Include plan components, beyond desired conditions, to assure adequate protection and maintenance of national forest recreation areas.
- Better integrate recreation to other aspects of the plan such as fire and ecological integrity.
- Provide direction to improve education and interpretation so that all visitors better understand how to enjoy the forest responsibly.
- Commit to more robust partnerships with local communities, conservation groups and others to help achieve desired conditions for recreation.
- Improve Recreational Opportunity Spectrum (ROS) understanding by providing more detailed maps, including standards and guidelines for the management of each ROS allocation, and by

adjusting some primitive and non-motorized boundaries to better protect inventoried roadless areas.

- Identify and address different seasons of recreation in the plan, including differentiating between summer and winter ROS. This can help lay the groundwork for winter travel planning.

For more information about Wilderness and Wild & Scenic Rivers, contact Steve Evans at CalWild at sevans@calwild.org or (916) 708-3155. For more information about Fire Management, Old and Early Forests, Wildlife Species at Risk, and Aquatic and Riparian Ecosystems, contact Jamie Ervin at Sierra Forest Legacy at jamie@sierraforestlegacy.org or (828) 403-0418.