



## **NATIONAL FOREST RECREATION ASSOCIATION**

Responsible Recreational Use of America's Public Lands and Waters

Planning Team Leader  
Forest Plan Revision  
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Dear Planning Team Leader,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement for revision of the Inyo, Sierra and Sequoia National Forests. These comments are submitted on behalf of the National Forest Recreation Association (NFRA).

The National Forest Recreation Association was founded in 1948, and represents recreation businesses located on national forests throughout the United States. NFRA members have a wealth of experience providing front line service to the public and maintaining safe, desirable facilities. NFRA members have facilities on the Inyo, Sierra and Sequoia National Forests.

Examples of the recreation facilities and services offered by NFRA members include:

- Campground concessionaires operating campgrounds, picnic areas, boat launches, swimming areas, and cabins.
- Resorts, Pack Stations and Marinas offering lodging, horseback trips, interpretive programs, boat rentals, RV parks, tour boat rides, stores, cafes, and shuttle services.
- Outfitting and Guiding.
- Private and organized youth and family camps.

Members of the National Forest Recreation Association embrace the concept of being partners with the Forest Service in providing recreation services to the public. The specific types of permits that NFRA Members have include:

- ✓ Term Special Use Permits (authorizing the operation of privately constructed facilities on national forest lands);
- ✓ Granger-Thye Permits (authorizing the private sector to operate and manage government owned facilities such as campgrounds, day use areas, resorts and lodges);
- ✓ Outfitter and Guides; and
- ✓ Youth Camps.

Professional management of the recreation special uses program is a critical link to the delivery of services. NFRA members are vital partners in providing recreational services, facilities, and opportunities to the public. NFRA members are integrally involved in the local communities in which they operate. They contribute significantly to local economies by hiring hundreds of employees (both seasonal and permanent); utilizing local contractors; purchasing products and supplies; and paying local, state and federal taxes. They provide recreation services and facilities to a diverse spectrum of visitors.

## **Recreation**

The DEIS and the Draft Plans for the Inyo, Sequoia and Sierra all use the term ‘Sustainable’ as an adjective for Recreation. The other resource areas (Timber, Fire Management, Air, Water Quality, Aquatic, Wilderness, etc.) do not have a subjective descriptor preceding the topic. We request this term be eliminated. ‘Recreation’ should be evaluated as a resource as it is stated in the Multiple Use Sustained Yield Act, and subsequent laws pertaining to forest management. ‘Sustainable’ is poorly defined, nebulous, and vulnerable to broad interpretation that is not grounded in law, policy or direction. Every single person will have a variation of how they define ‘Sustainable’ and it should be not left up to the agency to establish what is and is not ‘sustainable’ for recreation services and facilities. Recreation uses continue to change with new sports, equipment and activities evolving with each generation of users. When the Forest Service locks itself into a narrow prescription, they are unable to accommodate the changing demographics and needs of the public. An example of this is the number of campers allowed at a campsite. Usually the limit is 6 persons per site. However, many families of diverse ethnic backgrounds come to the forest in larger extended family groups. The number of campsites that can accommodate larger groups is very few, thus it is difficult in most cases to meet the desired condition of attracting ‘culturally diverse’ visitors to the forests. Snowboarding, mountain biking, and paddle sports are relatively new activities which are hugely popular. This illustrates the need for the forests to have the flexibility to provide for the public, rather than restricting and reducing use. The DEIS should reflect this diversity, the evolution of changing needs, and establish guidelines for recreation visitors to be accommodated.

There should be definite and affirmative statements regarding the partnerships with the Recreation Special Use Permittees on each forest, and to re-affirm their importance in providing recreation services and facilities to the public. With the projected declining budgets and personnel for the Forest Service, there will be an increasing importance on these partners to provide the public the services, facilities and opportunities for recreation. References to the wide range of recreation service partners that exist on each forest are acutely lacking. Their role and importance needs to be identified as critical to the delivery of the recreation program, and they need to be given high priority for the continuation of their operations. Working cooperatively with the Recreation Service Partners needs to be a priority and specifically identified in every desired condition and strategy pertaining to Recreation and Congressionally Designated areas (such as, but not limited to: Wilderness, Wild & Scenic Rivers, & Monuments).

There is an opportunity with the forest plan revisions to emphatically state that recreation is a high priority for the Forest Service, and that recreation service partners are a valuable and necessary component of the delivery of recreation activities to the public. It should also be stated that responsible recreation is an acceptable use, and that there should be opportunities for future growth to accommodate the increased demand.

We agree with the prominent theme that there is a need for more flexible and adaptive land management plans (Volume 1, page 6). Recent fires and loss of millions of drought and beetle killed trees clearly show the need for more action to actively manage these public lands. Loss of recreational uses is one result of the impacts from fires and drought.

Tables 6-8 beginning on page 50 shows a wide range of projected treatments between the three forests and the alternatives. Based on falling budgets and staff levels it is unlikely that any of these levels of treatment can be accomplished without expanding partnerships, including expanding the role of special use permits to provide recreational opportunities and maintenance of facilities. Increased public use and awareness could provide added support for the needed management actions necessary for the ecological survival of these lands.

Table 14 on page 53 and Table 106 on page 487 indicate a reduction of lands classified as Roaded Natural (RN) on all three forests. Driving for pleasure is one of the most popular activities, yet we see no analysis of the effect of reduced RN areas on this recreational use. If some roads will be closed due to the re-classification this must be disclosed and addressed in the DEIS. Since RN areas are where roads are found that support this activity we would like to see an analysis of the effect of reduced RN areas on driving for pleasure and the effect on special use permittees that support this use.

Assumptions for the analysis found on page 461, indicate budgets and staffing are falling and recreational demand is rising. We agree with these assumptions and feel there needs to be greater priority placed on supporting additional partnerships and special use permits to help meet public demand. This lack of budget and staffing needs to be addressed in the analysis to clearly show the effects on the alternatives.

The niche statement for the Sequoia NF beginning on page 472 needs to be re-written to more accurately represent the area. The statement includes “scenic lakes and reservoirs” in the description but there are no natural lakes outside of Wilderness on the Sequoia NF and the few that exist are difficult to reach and not visible to visitors outside of the wilderness. Another quote states “Some of the most outstanding visual attractions include...the Little Kern River drainage characterized by many streams, small lakes and alpine meadows surrounded by majestic mountain peaks.” The Little Kern drainage has very few lakes or alpine meadows and the area is virtually invisible to all but visitors to the Golden Trout Wilderness. The North Fork of the Kern River, where it is accessible to most visitors is a highly impacted river corridor with a multitude of campgrounds, roads, and impacted recreation sites. Further on the statement says “The most common developments on the Sequoia that alter scenic integrity include...geothermal developments...propane tank storage...ski areas.” These features are not common developments on the Sequoia National Forest. The ski area is a small facility that is unobtrusive and beloved by its loyal customers. I believe the most common development that alters scenic integrity on all three forests is roads.

The planned level of vegetation treatment in Alternative B is inadequate to improve the forest health needed to adequately protect wildlife habitat, watershed condition, communities, and public use of these national forests. The current impact of fires and drought are the direct result of overstocked stands in the montane forests of the Sequoia and Sierra National Forests. Over reliance on managed wildfire and prescribed fire that is not preceded by mechanical treatment will increase the impact of smoke on visitors and nearby communities. Nature is thinning the forests through drought and fire in a manner that is not acceptable to most of the public that value these lands.

Each forest plan identifies the importance of maintaining the Class 1 Air sheds, as well as ensuring there is adequate quantity and quality sustained for the watersheds. With the restrictions on tree size and harvesting in the alternatives, all 3 forests are in constant violation of the air quality standards, and the erosion and soil sterilization from massive fires is permanently devastating. In addition to the impacts to air and water quality standards, there are short and long term impacts these fires cause to recreation activities and facilities.

Attached is a map of the Cedar Fire, on the Sequoia National Forest, showing the tree mortality that has exacerbated the fire situation. Also attached is a report showing the closure of recreation facilities, and another press release regarding the health risks to communities from the smoke. In addition, the daily report shows the cost of the 9 day old fire to be \$20.3 million, with only 10% containment. The daily report lists all of the communities that have been evacuated. It is no wonder there is no funding for recreation if a fire consumes \$2.2 million per day. Aggressive forest management must begin if the other attributes and desired conditions of the plan are ever to be achieved.

### **Wilderness, Wild and River, and Special Places**

The Inyo and Sierra went through 10 years of developing a Wilderness Management Plan and Needs Assessment for commercial services for the John Muir, Ansel Adams and Dinkey Lakes Wilderness Areas. The Final EIS for those Plans is comprehensive. As an intervenor in lawsuits regarding that planning effort, NFRA would object to any changes to those plans. The EIS for the forest plan revision should fully adopt the Plans as they are. If there are any changes proposed, a full NEPA process to amend the Plan would need to be completed.

For any new wilderness, wild & scenic, or other specially designated areas being recommended to Congress, NFRA can only support such additions if the following language is included in the text of the legislation:

- ✓ Recognition of pack and saddle stock use (commercial and recreational) as appropriate and consistent with the character of the area.
- ✓ Recognition that management of a trail system and associated trail structures (bridges, turnpike, drainage, etc.) to a standard sufficient to accommodate pack and saddle stock is appropriate (where that use existed at the time of designation).
- ✓ Recognition that a sustainable level of pack and saddle stock grazing is appropriate to accommodate the use, especially where that use existed at the time of designation.
- ✓ The designation does not prohibit or preclude the traditional and historic use of all trails, roads, paths, campsites, meadows, and cross-country areas in the designated area by both recreational and commercial pack and saddle stock, including but not limited to: horses, mules, donkeys and ponies.

- ✓ All access and use of these lands by recreational and commercial pack and saddle stock shall be allowed to continue in the same manner and degree at levels no less than the highest average of the past 5 years. The uses include travel on designated system trails, historic user trails, cross-country travel, grazing, and camping. Campsites and meadows with improvements such as, but not limited to, corrals, hitch rails, fences, and water troughs that were in existence at the time of designation shall be maintained and improved if necessary, for their continued use.
- ✓ There shall be no reduction of group/party/stock size from current levels, no further restrictions of camping stay limits, no further restrictions on trails and campsites used, and no fees for stock groups that differ than fees for other public users.
- ✓ If commercial pack and saddle stock use exists at the time of wilderness designation, no further analysis is necessary to determine the ‘need’ for this use, or the ‘extent necessary.’ It shall be considered redundant to conduct any further analysis, and shall not be required under this legislation. The historic levels of use will be the base level, and will not be reduced from the highest level in the past 10 years.

Wilderness designation has a negative economic impact to local communities. The attached study, titled: ‘The Economic Costs of Wilderness’ provides validation.

## **Cultural Resources**

Page 20, states:

“Historically, Region 5 and the Sierra National Forest have viewed cultural resources through the framework of legal compliance with Section 106 of the NHPA”.

A condition for a need to change for: “Recreation USE”, page 22, in part states:

“Cultural Resources are impacted by a variety of recreational activities; however, direct physical damage is generally the most destructive. “Many existing recreational facilities are currently located on or near cultural resources (obsidian chips, TCP’s and Contemporary Native American use), and their impact free management (in accordance with NHPA law & FS policy) is problematic”.

The Plan wrongfully compromises existing facilities for perceivably impacting resources that are mostly common obsidian chips. These chips can easily be scattered around by anyone. A new twist in defining resources that could affect facilities includes: Native American contemporary use areas.

- Any Forests’ action applying resource impact mitigation actions against existing facilities to allegedly protect resources is inconsistent with historic law (NHPA), Forest Service Policy and unjust to facility owners and recreation users.

Guided by historic law, obsidian chips are protected in many ways by Forest Service Policy without affecting recreation facilities. Obsidian chips can be buried or archived. The Forest has never exercised these options to protect obsidian chips found on resort and campground property. But, the proposed Plan protects common obsidian chips by leaving them in place, canceling existing facility use and limiting facility activities to what enhances the public understanding of the common non-historic obsidian chip resource, i.e. the confiscation of facilities.

Obviously, the Plan imposes extreme penalties on recreation facility owners and takes away valuable public recreation opportunities. Plan language that compromises existing facilities to protect any kind of resource should be deleted.

The 2016 Sierra National Forest Draft Revised Land Management Plan language:

Forest Service and tribes should not manage obsidian chips or sacred sites on facility property that is under a Special Use Permit to another party.

Under Desired Conditions: Sustainable Recreation (existing recreation) (required to be explicit and non-ambiguous), chapter 2, page 44, states:

“Cultural resources, traditional cultural properties and sacred sites are protected through project design and consultation with Indian tribes, tribal cultural leader and consulting parties”.

The resource protections should be, as required, following NHPA law that exempts existing facilities from being subject to resource impact mitigation measures.

Under Potential Management approaches, Sustainable Recreation, chapter 3, page 89 states:

“Use management strategies to mitigate recreation use and resource conflicts”  
(Appendix D).

Appendix D, page 149, states: Management strategies can be applied to or new recreation sites and uses whenever a conflict between recreation uses or sensitive resources is detected. Sensitive resources include at risk species and habitats, riparian habitats, soil and watersheds, heritage resources and other resources”.

This Plan component states that existing recreation sites are subject to resource impact mitigation action that may severely compromise existing facilities. Also, the above mixing in of non-cultural resources that are protected by a myriad of laws and regulations is also inappropriate. This component should be deleted from the Plan.

All the Management strategies for Appendix D: Perimeter Control, Presence and Direct Actions are worded to affect existing recreation facilities: for example: the direct action in part, page 149, states: Locate new facilities and areas for redistributing human use away from sensitive resource... if monitoring and evaluation indicate that closure is ineffective, take steps to decommission facilities and permanently discontinue facilities and permanently discontinue visitor use.

The total of the Appendix D actions, on page 149-150, are somewhat ambiguous that may work to the advantage of cultural resource advocates. Regardless, clearly most of the language is targeted at existing recreation facilities. That, in turn, will potentially compromise the very existence of a recreation facility and valuable recreation use. All these components should be deleted, or modified to not affect existing or new recreation facilities in any way.

Under Tribal Relations and Uses, page 90:

Manage Mono Hot Springs to maintain a near-natural setting for traditional Native American use. This appears redundant. This statement is in the 1991 LMP that preserves the natural concrete lined hot springs for Native American use that does not exclude others.



Under Design Criteria, Guidelines, chapter 4, sustainable Recreation, page 103 states: “recreation uses should be managed adaptively to prevent impacts to other resources and recreation setting, while considering the recreation place inventory; and redesign, restore, or rehabilitate recreation sites where recreation activities have caused unacceptable natural resource and social resource impacts.” and Cultural Resources, page 104 states: “to protect the cultural setting of a site and visitor experiences, commercial use of heritage-based interpretive sites should be limited to activities that enhance the public understanding of the resource, protect and preserve the resource, and are consistent with tribal interest”.

The Plan language limits existing recreation facilities to activities that enhance the understanding of the resource (obsidian chips etc.) to be protected, and supports the Plan Assessment for changes resolving the “problematic” existing recreation facilities. This Plan component should be deleted from the Plan.

Under Appendix B. Proposal and Possible Actions: Sustainable Recreation, page 138, states: “Complete regular patrols at developed facilities to check for public safety and facility and resource protection”.

This language validates that there will be Forest efforts to compromise developed existing facilities to protect resources; therefore, this Plan component should be deleted.

**Summary:**

We believe there should be more priority placed on the Recreation Special Uses program to expand recreational opportunities, services and facilities to meet the needs of the public and to promote outdoor recreation as directed in the Multiple Use Sustained Yield Act of 1960.

Thank you very much.

Sincerely,

*Marilyn Reese*

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Executive Director, National Forest Recreation Association

Enclosures