



Dear Region 5 Forest Plan Revision Team,

Thank you for your hard work revising the draft forest plans and draft EIS (RDEIS) for the Sierra and Sequoia National Forests. Our organizations – representing stakeholders from the conservation and human-powered recreation communities – submit this letter and attached GIS dataset to clarify several errors in the existing Alternative E related to Recommended Wilderness Areas (RWA) and Backcountry Management Area (BMA) boundaries.

In the spring of 2018, our organizations worked collaboratively to create a proposal for protecting roadless areas across the two forests that we feel provides a good model for balancing management of wilderness and recreation resources in a forest plan revision¹. The proposal includes 1) a set of carefully drawn RWA boundaries that avoid mountain bike trails, developed climbing areas, and most motorized trails on the ten potential RWAs of highest priority to the conservation community; and 2) a concept for BMAs intended to protect roadless character while allowing for a wider variety of recreational activities than recommended wilderness.

We appreciate that the USFS included our proposal in the RDEIS as Alternative E. However, the data that was ultimately included in the Alternative E maps is an incomplete early draft that misses several important edits. In comparison with the current Alternative E, the final dataset:

- Better reflects on-the-ground knowledge of existing mountain bike trails and provides a minimum 50-foot buffer between trails and RWAs to account for trail re-routes;
- Excludes a known roaded area along the southern end of the Monarch Wilderness Kings River Addition;
- Eliminates several smaller BMAs.

The proposed RWAs also include several rock climbing areas, most notably Patterson Bluffs within the Sycamore Springs RWA. While rock climbing is a common and accepted use of wilderness areas throughout the Sierra Nevada, the USFS' current lack of an agency-wide policy on the use and placement of fixed anchors in wilderness leaves the impact of wilderness recommendations uncertain for both climbers and wilderness advocates. We urge the Forest Service to adopt an agency-wide policy on fixed anchors that is similar or identical to Directors Order #41 within the Department of Interior². In the absence of such a policy, we feel that the following legislative language – developed collaboratively by

¹https://www.sierraforestlegacy.org/Resources/Conservation/ProjectsPlans/ForestPlanRevisions/SupportLetterRWA_4-9-2018.pdf

² https://www.nps.gov/policy/DOrders/DO_41.pdf

The Wilderness Society and the Access Fund – provides an appropriate template for clarifying when and where the placement, use, and maintenance of fixed anchors is appropriate in wilderness areas:

(b) RECREATIONAL CLIMBING.—Nothing in this Act prohibits recreational rock climbing activities in the wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this Act—

(1) in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and

(2) subject to any terms and conditions determined to be necessary by the Secretary.

While the conservation community ultimately supports wilderness protection for more areas than those identified in Alternative E, the USFS should always consider the impact of wilderness recommendations on outdoor recreation resources. We consider the approach to RWA boundaries used in developing Alternative E to be an appropriate model that we hope will be used in the future.

Finally, we encourage the USFS to include a collaboratively-developed wilderness alternative in future forest plan revisions in the Sierra Nevada. Our work in creating Alternative E could have been greatly improved by a true collaborative process completed prior to the release of the Draft EIS involving a wider variety of stakeholders. Our organizations would be willing to commit time and energy to such a process in the future.

Thank you.

Sincerely,

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