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NORTHERN CALIFORNIA REGIONAL CONSERVATION COMMITTEE

P. O. Box 485
Kingsburg, CA 93631

19 June 1976

Forest Supervisor
Sierra National Forest
Federal Building, Room 3017
1130 - "O" Street
Fresno, CA 93721

Attention: John Kruse

Sir:

1. These comments on the Sierra National Forest's proposed Off-Road Vehicle Plan are on behalf of the Sierra Club's Northern California Region.

2. In view of the fact that the regulations proposed for Zone D would permit practically unlimited ORV use everywhere, with very little by way of meaningful or enforceable controls, it seems inappropriate to place essentially half of the entire Forest in Zone D. We recommend that much of Zone D--in fact perhaps most if not all of it--be reclassified as Zone B.

3. Considering that Zone B consists of little more than those portions of the Forest on which motor vehicles have already been controlled for many years, it would appear that the proposed ORV plan would do little more than formalize the status quo. It thus appears that there is a very real risk that you are about to violate Executive Order 11644. We urge that you read the Order more closely, and make a greater effort to abide by its requirements.

4. Although the definition of Zone B implies that it includes the Inventoried Roadless Areas in their entirety, the map indicates otherwise. (This is especially true in the Kaiser area.) A Forest Service spokesman at the public meeting on June 12 stated that the intent had been to include the IRA's in their entirety. It is thus our understanding that they are so included in their entirety, regardless of what the map indicates. Please inform us as to whether this is also your understanding.

5. The Forest Service stated at the public meeting that the South Fork Merced River IRA has a corridor leading into it to permit the 2WD trail officially to exist. If this is so, it would indicate that the South Fork Merced IRA boundaries have been changed since they were first made public (in 1972?). We are aware that you have been continually revising the IRA boundaries, but this is the first time we have discovered its [redacted] having been done for the express purpose of permitting an intrusion to occur. Especially since the Sierra N.F. considers past ORV activity to disqualify an area [redacted] as Wilderness, permitting ORV's to use an IRA is totally unacceptable. Furthermore, to justify it by simply changing the IRA boundary appears to be a violation of the pre-trial settlement of Sierra Club vs. Butz. We urge that you closely re-examine

in general your practice of continually altering the IRA boundaries, and that you re-examine in particular your action on the South Fork Merced River IRA.

6. The proposed ORV plan map shows an ORV spur trail heading toward Hedrick Meadow from the Heitz Meadow ORV trail. Our observation is that this spur trail has been officially closed for a number of years, with very substantial physical barriers having been purposely placed at the beginning of the trail. We would be opposed to any plan to reopen the spur trail.

7. In Zone B snowmobiles should be limited only to the designated ORV routes. To permit them to travel everywhere is an open invitation to "conflicts of use" between and among Forest visitors. This clearly would be a direct violation of the Executive Order, and we strongly urge that this oversight be remedied. In effect, we are saying that the regulations proposed for Zone E should also be applied to Zone B.

8. The naming of specific dates in the section on seasonal use seems unnecessary and could prevent proper management. The manner in which the July 1 date is stated in both Zone B and Zone D regulations could be interpreted as indicating that no matter how wet the soil may be, the trails or areas would no longer be closed for that reason once the specified date has passed.

9. Requiring only six inches of snow depth in order to operate snowmobiles seems very inadequate. Some of the snowmobile owners at the public meeting agreed that this is so. The condition of the snow should be taken into account in determining whether it is adequate to support snowmobiles without damage to the terrain, flora, and fauna. We urge that a more adequate formula be devised.

10. The provision for a 600 foot wide corridor in Zone B(under Special Rule #3) is not acceptable. Any vehicular travel off the designated trail should be restricted to access to designated sites, which in no case should be more than 300 feet from the main trail. Otherwise what starts out as a "Designated Off-Road Vehicle Route" could end up being a 600 foot wide corridor of tracks, eroded soil, and damaged vegetation.

11. The Dusy Creek jeep trail (from Courtright to Thompson Lake) has repeatedly been, and continues to be, the subject of controversies of various kinds. I am not aware that the Sierra Club has previously recommended closure of the trail, but it now appears that the Forest Service should give serious consideration to this. In view of the long-standing problems, it seems hard to justify leaving this trail open. We would be interested in discussing this with you and with representatives of the jeep clubs. It does seem as though some equitable solution to the problems could be worked out if the concerned parties would simply start talking with each other.

12. Although the situation on Rancheria Creek (Crown Valley area) is different in several respects, we nevertheless feel that the jeep trail from Spanish Lakes to Chain Lakes should probably be closed. Again, we would be interested in discussing this with you and with representatives of the jeep clubs.

13. I would note that we are disturbed by your remark that the

final ORV plan "will basically be the same as the (proposed one) with slight revisions based on input from the public." (emphasis provided). We trust that you didn't really mean it that way.

14. In view of the exceptionally serious questions we have raised in paragraphs 3, 4, 5, 7, and 13, we are requesting that you respond to this letter with one of your own. The suggestion we made in paragraphs 11 and 12 regarding getting interested parties together for discussion also calls for a response on your part, although perhaps as a separate communication at some later date.

Very truly yours,

George W. Whitmore
Vice-Chairman for Federal Lands
Northern California Region.