

Summarized Public Comments

Susan Kane: Director, Sierra Cascade Land Trust Council

I just read through the Plan again and one item in particular caught my eye: P. 19 --- the lack of comprehensive data re land mgt and impacts on water.

This is something we wanted to address in the Foothills Report but did not have enough funding to do a comprehensive study. It is an extremely critical issue (as Dan Macon knows) that cuts across everything else outlined --- water, local food, keeping ranches and farms in production through conservation easements (preferably), and tourism and rec.

The overall plan looks great-- and ambitious.

SNC response: no change needed to Strategic Plan; input will be considered as Action Plan is developed

Bob Kirkwood: Sierra Nevada Conservancy Boardmember

"(f) Assist the regional economy THROUGH THE OPERATION OF THE CONSERVANCY'S PROGRAM." 23.3 of the PR Code section 33320. The other program areas--except the two omitted as attitudinal not programmatic--are accurately reflected in the draft plan with a change of syntax. The current plan quotes the full language above. Without the qualifying phrase this has proven to be misleading to many when it was used. As I recall this issue came up in connection with our current plan and I see it was resolved on page 7 by quoting the full statutory clause. I recommend that we do the same this time in every place where the language appears. I spotted it on Pg. 5, 16, 19, 22 and 25.

Make sure full statutory language is quoted in all cases:

"(f) Assist the regional economy THROUGH THE OPERATION OF THE CONSERVANCY'S PROGRAM." 23.3 of the PR Code section 33320.

SNC response: change made

Betony Jones: Managing Partner, Fourth Sector Strategies

First, the Priority Areas for the next five years look overlap a lot with the successes of the past five years. Although I am sure there is a lot more that can be done in those areas, I was hoping for more ideas of new opportunities for the region.

Second, I would like to see more overlap with economic goals for the region, beyond tourism and recreation. Tourism is an important economic driver, but economic diversification in the Sierra and working toward new ways of linking a healthy economy to a healthy environment (i.e. ecosystem services, energy efficiency, low-carbon technology, etc.) should be a priority for SNC. The low-carbon economy is expected to triple by 2020, and California is leading the way in addressing global environmental

challenges and demonstrating profit from doing so, but the Sierra Nevada remains a playground for the people dedicated to that. Couldn't we try to do more?

Third, the economic recession further undermines workers rights across all areas of employment. I think we need to do a better job of linking environmental quality to social and economic well-being. 10 years ago, forest management in the Sierra was a hugely controversial topic, and today more groups and interests are finding common ground. Now living/prevaling wage is the hot-button issue, especially in rural areas, and if we want people to find common ground, we have to encourage constructive dialogue. For example, why is there more passion around bringing urban youth to work on our National Forests than creating good living wage jobs for the people who live in forest communities? Why does so much of the energy efficiency work in the Sierra get outsourced to urban firms? Why does almost no one in the Sierra (it seems) support the notion of paying workers prevailing wage? These are questions we need to think about and encourage discussion around, and SNC as a convener could help with that.

Finally, noticeably absent from the Strategic Plan is any mention of Climate Change mitigation or adaptation. This is alarming and somewhat frightening. Is it too big? Too overwhelming? Too depressing? Too controversial? I believe that at this point, climate action will only be effective at the community level. Highlighting the opportunities and community co-benefits of climate action (rather than the environmental risk) is the only way I think we will move forward over the next five years. With California primed to target climate action head-on, SNC could do more to help Sierra communities understand and develop ways to contribute to and benefit from the state's climate policy.

SNC response: the areas of focus for the plan align with the mission and program goals of the SNC, which are statutorily mandated. As pointed out in other public comment received, our role in assisting the regional economy is tied to the implementation of our programs. True to that statutory direction, there's a significant economic component built into three areas in the plan—healthy forests, preserving ranches and agricultural lands, and promoting sustainable tourism and recreation. This includes efforts to identify ecosystem services and the opportunities for investment in the Region to ensure the continuation and enhancement of those services. There's also a link between economic vitality and the objectives within every area of focus in the plan related to advocating for the Region and bringing additional funding into the Region. We believe the roles set forth in the Plan for the SNC will involve us in improving local and regional economic vitality in ways that align with our mission and program goals and the input we received through extensive public outreach during the course of developing the Plan. Although the term "climate change" is not specifically called out in the Plan, it is implicit in many of the objectives and strategies and climate change will be addressed as part of the actions that will support these objectives and strategies. This integration of climate change into all of the areas of focus is consistent with direction given by our Board in December 2010.

National Park Service, Sequoia and Kings Canyon National Parks

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IN REPLY REFER TO:
N2221

7/24/2011

National Park Service
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Sierra Nevada Conservancy
Attn: Janet Cohen
Auburn, CA 95603

Dear Ms. Cohen:

On behalf of Sequoia and Kings Canyon National Parks, we would like to thank the Sierra Nevada Conservancy (SNC) for this opportunity to review and comment on your "Strategy Plan 2011 Public Review Draft" dated June 23, 2011. Our comments are divided into two groups: "specific" and "general." If you have any questions, please contact Charisse Sydoriak, Chief Division of Resources Management and Science at charisse_sydoriak@nps.gov or (559) 565-3120.

Specific Comments

Page 3—Vision Statement: "...vibrant communities and landscapes sustained for future generations." It would be helpful if the term "landscapes" was defined. As drafted, any landscape regardless of character or qualities is acceptable. May the reader assume that the intent is "rural", "working", or "fully-functional ecosystems" driven by natural processes, biologically connected, and occupied by native species? Or does the SNC envision developments that increase the tax base such as more subdivisions, mines, timber mills, and similar job generating developments?

Page 3—Features: Please consider adding clean air as a valued "feature." While we note that air quality is identified under "program areas" (page 5) in other parts of the document, it does not appear as an explicit value in the Features discussion. The Sierra Nevada boasts the largest contiguous wilderness area in the State. The airshed of this area is supposed to receive the highest level of legal protection (Class I) under the Clean Air. Clean air, not only enhances public health, it also frames the spectacular scenic vistas of the Sierra Nevada.

Page 3—Features: Bullet 5 refers to preservation of the Region's cultural, archeological and historical resources. How are these resources defined by the SNC?

Page 4—Service Area: The area’s air quality/viewsheds should be identified as an extraordinary resource even though the southern Sierra Nevada air quality is impaired at times by the worst air pollution (particularly ozone) in the state and country.

Page 8—Climate Action Plan: The last sentence in this section states that while some actions prescribed in this plan have been implemented, “other actions...still need to be completed [and these actions] are included in this new Strategic Plan as actions under individual Areas of Focus.” The Areas of Focus do not clearly identify these Climate Action Plan related actions.

Pages 10-11—Supporting our Partners: Only two efforts are mentioned (Sierra Water Group and California Natural Diversity Database and Vegetation Mapping). Are these really the only Partners that resulted from “Our First Five Years”? How does the SNC define its past and present “Partners.”

It could be very helpful if (at a minimum) this entire section were reorganized within a strategic framework to give the reader a sense of organizational design, direction, progress, gaps, and connections (context) to justify the Five Focus Areas (page 12) in the Development of this New Strategic Plan section. We suggest that the list of efforts outlined in the First Five Years section be given significantly more structure by organizing the identified efforts around the allowed activities in the statute governing the SNC (page 13) which do not appear until 1 ½ pages into the Development of the New Plan section. Better yet, move the fundamental information about what the SNC is empowered to do from pages 13 and 14 to just before the “Governance” section. This modification would enable a shorter introduction to the five “Areas of Focus” and provide essential pragmatic information about legislated operating boundaries at the beginning of the Strategic Plan.

If an overarching business framework were available for reference, the reader could potentially appreciate why elements in “previously adopted plans were deemed to be no longer relevant due to actions already taken....” (page 12, paragraph 3). What happened to make an action “no longer relevant”?

Page 15—Healthy Forests Discussion: The second sentence of the first paragraph is run-on and does not make sense. Please note that the statement that “It is vital that the...ecological health of the Sierra forests [be] restored....” should be rewritten since restoration of past conditions (generally how we have been defining a healthy forest ecosystem) is impossible except through extraordinary investment of effort in small areas (showcasing past environments). Accelerated climatic change, altered fire regimes, invasive plants, fragmented landscapes due to developments, and pollution compel us to adopt a new paradigm for Sierra forests. This paradigm would define healthy forests based on the presence of critical structural elements and processes (like frequent low-intensity fires). The forests of the future will undoubtedly be very different. To try to restore past conditions and maintain existing ecosystems in perpetuity is fool-

hardy. While the first paragraph is problematic in setting the stage for action, the ideas put forth in the following paragraphs are on track.

Page 19—Preservation of Ranches and Agricultural Lands: A critical topic that is missing from the discussion is the fact that fertilizer and pesticide applications in the Central Valley are having a serious adverse impact on human health and the environment. For example, Fresno County has the highest incidence of asthma in the nation. These agriculture-related chemicals are also affecting the ranchers and farmers because they are very expensive. Central Valley fertilizers and pesticides are contaminating middle and high elevation Sierra water bodies which have very poor chemical buffering capacity.

Page 21—Watershed Protection and Restoration: Please insert a map or cite the source for the “31 major watersheds” mentioned in the first sentence of the discussion.

Page 24—Promote Sustainable Tourism and Recreation. Local recreation opportunities and tourism could be enhanced by collaborating at a regional scale to reduce pollution. Please consider adding an objective to address regional air and water pollution to support sustainable recreation and tourism throughout the Sierra. Some people avoid the southern Sierras or leave the region prematurely because recreating here is harmful to their health.

A subtopic under this objective is episodic fires and associated smoke impacts. There is understandable tension between enabling sustainable and healthy fire-dependent ecosystems and minimizing particulate matter in the air, but the greater pollution source by magnitudes is the release and transport of pollutants from burning fossil fuels and applying chemicals on agricultural lands.

General Comments

We suggest that all factual statements throughout the document be supported by a citation where the statement is made.

The Draft Plan mentions both generally and specifically the importance of enabling understanding and access to tools, information, data, and science-based knowledge. If the intent of the SNC is to broadly facilitate understanding and access, we wholeheartedly support the concept. Unfortunately, the Strategic Plan does not provide any information on what understanding and access might look like, how success will be measured, or any tangible direction or discussion of capacity for a centralized information and data access clearinghouse accessible to everyone. Information management, packaging for customized delivery and access to expert knowledge to facilitate learning is a missing component of the Draft Plan.

We encourage the SNC to adopt “Adapting to Accelerated Climate Change” as a stand-alone Focus Area. If this cannot be accomplished, an option is to explicitly address the topic as an action item within each Focal Area.

We were pleased to note that the SNC plans on "...offering technical and other assistance for collaborative efforts in cooperation with nonprofit, tribal, and government partners at all levels." (page 5); and that the "Guiding Principles" include: "build[ing] upon existing ...efforts"; using "the best available information and science;" and giving "priority to multi-benefit projects and integrated activities...that leverage other organizations' (government, private and nonprofit) competencies and funding" (page 6). The SNC, through informal staff networking has been an important contributor to the nascent Southern Sierra Conservation Cooperative (SSCC). We are very hopeful that the SNC will formally join the SSCC by signing the memorandum of understanding (MOU) this summer since the mission of the SSCC¹ and the purpose of the SNC are congruent.

The SSCC has elected to focus on sponsoring a Science in Support of Management in the Southern Sierra Nevada Symposium in the fall of 2012. We are hopeful that the SNC can assist us by becoming a "State Sponsor" for this Symposium which will inform federal, state, non-profits, and interested publics about natural resource conditions and stressors relevant to the Southern Sierra region. One of the potential outcomes of the Symposium could be the formation of working groups to look for potential opportunities to implement climatic change adaptation plans across jurisdictions. If you would like to discuss this sponsorship opportunity further, please contact Charisse Sydoriak, the parks' Chief of Resources Management and Science, at (559) 565-3120; or contact Koren Nydick, the SSCC Chair at (559) 565-4292.

Sincerely,

/s/ Karen Taylor-Goodrich
Superintendent, Sequoia and Kings Canyon national Parks

SIGNED ORIGINAL ON FILE

cc: Charisse Sydoriak, Chief, Resources Management and Science

¹ The mission of the SSCC is "*to leverage partners' resources and efforts to conserve the regional native biodiversity and key ecosystem functions within the Southern Sierra Nevada Ecoregion in the face of accelerated local and global agents of change.*"

SNC Response: After review and comment by the SNC Board on the first draft of the Strategic Plan in June, we are not prepared to make wholesale changes in how the Plan is organized or formatted. We also believe that some of the comments will be addressed through the development of our annual action plans, which will provide more details as to what we will be doing to implement the objectives and strategies contained in the Plan. With regard to requests for more information included in the comments above, we would be happy to meet with Karen to provide that information.

Responses to other specific comments are provided below:

- The SNC's vision and its associated features were firmly established shortly after the agency was formed. It was developed through a highly collaborative process that included extensive public input.*
- We will add viewsheds as an extraordinary resource of the Region on page 4 of the Plan.*
- The SNC Board decided not to include climate change as a separate area of focus in the Plan at its meeting in December 2010. Although the term "climate change" is not specifically called out in the Plan, it is implicit in many of the objectives and strategies. Climate change will be addressed as part of the actions that will support these objectives and strategies. This approach was confirmed by the Board Strategic Plan Subcommittee in August 2011.*
- With regard to "partners" we believe that this comment has arisen because of a misreading of the Draft Plan. "Supporting Our Partners" is included in a list of key programs and initiatives launched in our first five years. The Sierra Water Group and the California Natural Diversity Database are also included in this list and are not sub-programs of "Supporting Our Partners." In fact, all of the activities listed in that section of the Plan involved collaboration and partnerships.*
- With regard to the overarching framework of the report, we decided on the current structure to reflect on-the-ground experience gained in the past 5 years by our staff and input received from our stakeholders in a variety of venues. This approach is designed to better reflect the integration of many aspects of our work within the context of our statutory framework, but is not driven by our statutory framework in the manner you suggest.*
- The comments regarding the restoration of forest health suggests that this is synonymous with returning to historic conditions. We concur that this is not attainable in most situations. Forest health is defined in a variety of ways by a variety of interests and SNC is not attempting to develop the "ultimate" definition. By working collaboratively with interested parties the SNC intends to be a key partner in achieving forest health objectives that are place based and scientifically supportable.*
- The use of fertilizer and pesticides in the Central Valley is regulated by state and local agencies and is outside of the purview of the SNC.*
- With regard to addressing regional air and water pollution, we believe that objectives and strategies in the Plan related to preservation and stewardship of resources within the Region will help to address these issues. Given our current resource constraints, we are not prepared to add a separate objective under the*

Tourism and Recreation area of focus to specifically address all of the issues associated with air and water pollution in the Region.

- *The SNC plans to continue to participate in and support the Southern Sierra Conservation Cooperative.*