

EXHIBIT 4

**SIERRA ACCESS COALITION**

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Sierra Access Coalition would respectfully like to request a 90-day time extension to analyze and respond to the Plumas Draft Environmental Impact Statement (DEIS) for Motorized Travel Management.

There are many discrepancies, errors, omissions, and contradictions in the DEIS which make it very time consuming to read, research, and understand. Some examples are:

- The letter dated December 18, 2008 File Code 1950-3 that accompanied the release of the DEIS states that Alternative 2 is the "Proposed Alternative." However, page i states that Alternative 5 is the preferred alternative. This is very misleading and confusing.
- Alternative 1 is missing all inventoried unclassified route numbers making it difficult if not impossible to comment on individual routes.
- The spreadsheets that show what decisions were made on each individual inventoried route are not in the DEIS.
- Page 26 2.3.44 #2 says "Error! Reference source not found." Is there missing data?
- Page 45 says Alternative 2 "provides the greatest amount of access to dispersed use areas", but on page 46 it says Alternative 5 "provides the greatest amount of access to dispersed use areas". Which alternative has the most? Where are the areas located?
- Page 55 1B1 says that routes currently open to the public were determined to have "minimal safety concerns". (This refers to all inventoried routes which are currently open to the public under the Forest Order). 1B2 on the same page says the routes would "continue to have potential safety and exposure concerns". Which statement is true?
- Page 55 1B2 says there are 11.3 miles of mixed use. Which roads are they? There doesn't appear to be list of roads in the DEIS.
- Page 77 Indicator #2 Methodology states that there are "errors in the stream and meadow layers" of GIS and that other determinations were "based on an office exercise" so these are "not always accurate". But there is no documentation of how the assessments and analysis compensated for these admitted errors.
- Page 88 states "126 route/stream crossings" were observed and "85 miles were rated "extreme" and unmitigatable. However the DEIS doesn't appear to contain

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documentation to support this. Is there an Engineering report that made this determination?

- Pages 90-91 states Alternative 2 would result in prohibition of traffic on 738 miles. This mileage appears to be incorrect.
- Page 92 states Alternative 3 would allow 3922 miles of routes. This mileage appears to be incorrect.
- Page 94 – Which roads are affected?
- Page 96 states Alternative 4 allows 4058 miles of routes. This mileage appears to be incorrect.
- Page 100 states Alternative 5 would allow 4172 miles to be open. This mileage appears to be incorrect.
- Page 114 3. Cumulative effects refers to the “No Action” alternative, and the “Cross-country ban only”. What is the “**Cross-country ban only**”?
- Page 115 3.6.4 refers to Table 1 as being a list of TES. But Table 1 on page 16 is a list of roads, not a list of TES.
- Page 120 references “Mark, T personal communication”. What does that mean?
- Page 133 – Which Bucks Creek is being referenced (Bucks Lake or Feather River?) Which Rock Creek (Meadow Valley or Feather River Canyon?)
- Page 172 says “ERROR! Reference source not found” Is there missing data?
- Page 180 references Table 8, which is on page 43 and is a reference to recreation, not wildlife.
- Page 182 references Table 10 which is on page 44 and is a reference to recreation not wildlife.
- Page 182 references Table 11, which is on page 49 and is a reference to recreation not wildlife.
- Page 187 references Table 14, which is on page 54 and is a reference to serpentine ecosystems not wildlife.
- Page 200 references Table 24, which is on page 116 and is a reference to aquatic species, not terrestrial wildlife.
- Page 200 references Table 25, which is on page 200 and is a reference to aquatic species, not terrestrial wildlife.
- There is no explanation for the Cultural Resource codes.
- Water Resource – there is no explanation on the location of roads the water resource decision affects. Small maps in the back of the book don't help (page 422,423)

This is just a partial list of errors, discrepancies, omissions, and contradictions in the DEIS. These errors make it time consuming to read the document. It takes considerable time to

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understand what the document is trying to say, and to figure out which statements are true. There are also numerous references to other documents that SAC will probably need to request at a later date to enable us to understand the DEIS.

We have spent several weeks reading the DEIS, and as you can see by our references we are only up to page 200. In order to work our way through the document, an additional 90-days will be required to produce a comprehensive comment to the DEIS.

Please give me a call if you have any questions.

Thank you,

*Mike Lazzarino*

Mike Lazzarino  
Executive Director  
Sierra Access Coalition

cc: Sierra Access Coalition Steering Committee  
cc: Plumas County Board of Supervisors  
cc: California Off-Road Vehicle Association  
cc: Paradise Ridge Riders  
cc: Recreation Outdoors Coalition  
cc: Dave Wood  
cc: Don Amador, Blue Ribbon Coalition