



SIERRA ACCESS COALITION

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Plumas NF Planning Staff Officer

Re: Request for Public Comments on Travel Management Subpart A

Sierra Access Coalition (SAC) is submitting the following comments regarding the planning for Subpart A of the Travel Management Plan.

SAC members considered submitting individual roads on the forms provided by the Forest Service. This is a monumental task, particularly in such a short timeframe and a request for a time extension was denied. Also the public did exactly the same thing during Subpart B of the Travel Management Plan and submitted forms for hundreds of individual roads, only to have hundreds of the forms either lost or disregarded. Therefore, this time we feel a general letter might be more useful than submitting forms.

We remain confused that this is a planning process without a decision, rather than a NEPA process. 36 CFR 212.5(b) states "In determining the minimum road system, the responsible official **must** incorporate a science-based roads analysis". By definition, a science-based analysis would involve the NEPA process, yet NEPA is not being used for the Subpart A analysis. SAC requested documentation for the science-based analysis that is being used, but has been told the only documentation is the spreadsheet that has been distributed at the public meetings. The spreadsheet does not meet any definition of a science-based analysis, especially since there was no field observation of the roads. When SAC asked what constituted a H, M or L rating in the spreadsheet columns, we were told it was just a judgment call. Neither judgment calls nor reduced budgets constitute a "science-based roads analysis."

SAC representatives were at each of the six public meetings. We were told at the first meetings that the driving force behind Subpart A was declining budgets. Then at later meetings, we were told resource concerns were driving the process. Again, the conflicting information is confusing which makes it difficult for the public to make meaningful comments.

At the public meetings, we were told the PNF was directed to identify the minimum road system that is necessary for safe and efficient travel, for administration, utilization, and protection of NFS lands. PNF officials stated the "minimum road system" could consist of zero miles of road closures or several hundred miles of closures. If this is the case why has the PNF taken such an extreme interpretation by proposing 722.1 miles of road closures (nearly 20% of the existing road system), when a more conservative approach is allowed to be taken? Again, environmental issues are not supposed to be taken into account at this time.

At some of the public meetings, PNF officials stated that Congress mandated implementation of Subpart A. Tim Holabird, Congressman LaMalfa's aid, stated that is not correct. The Agency has directed itself to do Subpart A, not Congress.

At some of the meetings, the public was told the comments would be kept in a database and would be retrieved and used as comments on future projects. At other meetings we were told the PNF could not keep track of the comments that will be received during the Subpart A analysis. We have received conflicting information. Which is the process that will be used for future use of the comments that are submitted?

The following are SAC's comments and we want them to be added to the official record.

- It appears that roads which have been identified as "unneeded" have not had proper science-based analysis. SAC requested specialists' documentation, but was told there is no documentation available.
- All system roads on the PNF were identified as being needed as access for past land management activities. We fear that roads that are needed for future land management, such as timber harvest, thinning, fire suppression, and other management activities will be identified as "unneeded" in this process and will never be available for resource management in the future. This is a serious threat to the local economy. Our rural economy is based on the forest, such as vegetation management, recreation, and other uses. Road access is vital to our communities for many reasons, and the discussions at the public meetings gave no indication that economics has been given any consideration. If future projects to harvest wood products become uneconomical due to the cost of new road construction, our economy will suffer. If roads are too expensive to build, thinning projects will be too costly to implement, DFPZ's will not be built, and other land management projects will become uneconomical. Our communities will see increased threat of fire.
- As stated at the public meetings, under Subpart A the agency is only required to categorize roads as either "needed" or "unneeded". However, the spreadsheet includes environmental issues, which should not even be considered since roads are merely required to be classified as either needed or unneeded. Environmental issues are important, but they should not be part of this Subpart A process since the forest has stated Subpart A is not a NEPA analysis.
- Firewood cutting is a big issue to the general public. ML3 roads are not often used for wood cutting. The vast majority of firewood is available on ML2 and ML1 roads. SAC requests all roads within a minimum 10 mile radius of communities must be categorized as "needed" for firewood cutting. This will help the agency reach their goal of energy conservation by allowing access to remove snags and hazardous fuels near our communities, which in turn reduces fire hazard. The USDA Climate Change Program Office (CCPO) has identified one of the Forest Service's objectives regarding climate change is to promote "more use of excess and waste wood as renewable sources of heat." Closing roads used for firewood cutting is in direct conflict of the CCPO's objective.
- All roads should be categorized as "needed" within a minimum 10 mile radius of developed recreation areas such as lakes, to allow dispersed camping. Not everyone wants to camp in a developed campground, and the public should be given full opportunity to camp on quiet, secluded roads near all recreation areas. This is particularly important for hunters who have guns, OHVs, and harvested game animals which are not usually welcome in campgrounds.
- The road infrastructure must be preserved for fire suppression, search and rescue, and other emergencies. Evacuation of injured firefighters requires roads. The Hough Complex demonstrated the need for roads when on Aug. 19, the first morning after the lightning strikes, a fire crew was heard by the public on the radio asking for a dozer to open a road that had been previously closed by the Forest Service because they needed the road opened for suppression activities. The response was that a dozer was a minimum of 4 hours away. The Forest Service has admitted to similar incidents involving closed roads that were needed for fire suppression efforts during the American Fire this year and last year's Chips Fire. These are clear examples of road closures that have resulted in additional resource damage. We need to keep as many roads open as possible for fire access. This is vital to our communities, and this must be fully analyzed by a full fire team.

- RS 2477 roads must be eliminated from Subpart A. At a previous public meeting, Lee Anne Schramel Taylor said the PNF knows which roads are RS 2477 and has them mapped, so it should be an easy task to overlay these roads on the Subpart A maps and remove them from the “unneeded” list. The Forest Service does not have authority to close RS 2477 roads.
- Several roads that are proposed for closure are the only access to private lands, mining claims, and dispersed campsites. These roads must remain open.

It has been stated the reason for Subpart A road closures is declining budgets. We would like to suggest the Forest find unconventional ways to maintain their roads, such as:

1. The PNF should be more proactive in their State OHV grant applications to obtain funding for road maintenance. For example, their 2013 grant application requested \$435,000 but only 55.1 miles of maintenance was included in that grant application. The forest can apply for up to \$1-million for ground operations, but the vast majority of that grant request is only to cover employee salaries and toilet pumping, not for road or trail maintenance work. This has been the norm for years, and this source of funding for road maintenance is underutilized. This results in road closures.
2. At the Subpart A public meetings, it was stated that people would be cited if they performed any road maintenance activities without a signed volunteer agreement, which is extremely hard to get. Modifications to the current policy for volunteer work would make it easier to allow the public to do limited road maintenance, such as brush clearing, hand cleaning of culverts, and other maintenance that does not involve heavy equipment. These maintenance items are already covered by a Categorical Exclusion (CE) under NEPA and do not require specialists to analyze impacts from these activities. Allowing and encouraging volunteer work for minor maintenance would help fund road maintenance. It should be noted that SAC was turned down four times this year when we offered to do volunteer work.
3. At each Subpart A meeting, the public argued that if a road is not being used, it will grow over and close itself. The PNF response was this is unacceptable if there are culverts or ditches that could plug and cause erosion. So SAC proposes that all roads without culverts and ditches should not be proposed for closure, but allowed to close themselves over time if they are not used. Hydrologists at the meetings agreed there are usually no significant water quality issues on these types of roads. The information regarding locations of existing culverts and ditches is available in the INFRA database.
4. A greater percentage of the funds collected for firewood permits and Christmas tree permits could be deposited in road maintenance accounts.

Thank you for the opportunity to comment on Subpart A.

Corky Lazzarino
Executive Director

cc: SAC Steering Committee
Bob Perreault
Mike Crump
Lori Simpson
Tim Holabird
Amy Granat