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March 10, 2009

Travel Management Team
Plumas National Forest
159 Lawrence Street
Quincy, CA 95971

ATTN: Alice B. Carlton, Forest Supervisor

RE: Comments to the Draft Environmental Impact Statement for the Plumas National Forest Public Motorized Travel Management Project

Dear Ms. Carlton:

The Plumas County Board of Supervisors appreciates the spirit of cooperation that the Plumas National Forest has shown in approaching the many policy issues where the National Forest and Plumas County have shared interests. With respect to the Motorized Travel Management Project, we share your concern about protecting natural resources and water quality and ensuring motorized travel is appropriately managed. However, after reviewing the draft Environmental Impact Statement (DEIS), we are concerned that the proposed project is premature in its presentation and lacks content that is necessary both to adequately inform a decision as to the best alternative and to implement a successful and appropriate travel management program.

Plumas County offers the following comments on the DEIS in hopes of being able to work with the Forest to improve the travel management plan and effectively address the many issues and management actions that relate to travel management within the Plumas National Forest:

1. While labeled a "project," the DEIS actually presents a comprehensive plan for travel management which effectively amends the Land and Resource Management Plan for the Plumas National Forest. As such an amendment, the National Forest Management Act requires that the plan provide for multiple use and be coordinated with the land and resource management planning of local government. (16 U.S.C. 1604)

2. The DEIS does not adequately address land use designations under the Plumas County General Plan. There should be a comprehensive review of existing forest roads, whether officially recognized or not, taking into consideration zoning of private property, the potential for future use, and likely future access needs. Many private parcels use Forest Service Roads for ingress and egress. In particular, the standards for Limited

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Opportunity Areas state that all developments shall at a minimum have legal access by means of Forest Service roads or private road easements. In addition, fire-safe requirements dictate that development in Limited Opportunity Areas shall have a minimum of two access routes for roadways over one mile. An analysis needs to be performed to determine if any private properties will be affected by the project closures.

3. The County of Plumas has formally adopted the Herger-Feinstein Quincy Library Group Forest Recovery Act as a resource management plan. While the draft EIS acknowledges the pending HFQLG projects for purposes of considering cumulative effects, there is no analysis as to how the closure or elimination of existing roads may impact the feasibility of planned projects. Specifically, the EIS should compare the Forest-wide, landscape-scale DFPZ network of the Forest Health Pilot and HFQLG Pilot Project against a map of the Forest's proposed road closures and decommissionings. This comparison should be the basis for an EIS analysis and disclosure of any and all road closures potentially affecting access for forest treatments and for wildland fire suppression actions. Also, the travel management plan should address future fire suppression and forest management needs beyond the current scope of the HFQLG Pilot Project.

4. The County of Plumas has a Fire Plan that calls for identification or development of evacuation routes from communities at risk, particularly those communities that have only one primary access route. The travel management plan does not adequately consider the need for evacuation routes or whether existing roads that are proposed for decommissioning could provide evacuation routes themselves or serve as parts of new routes.

5. In 36 CFR 212.51(b), discretion is afforded to allow limited use of motor vehicles within a specified distance of designated routes for purposes of dispersed camping and hunting activities. This discretion should be exercised to allow long-established uses of the Plumas National Forest to continue in a reasonable manner.

6. The DEIS does not adequately coordinate uses between National Forest routes and the County road system or consider the opportunities for County roads to serve as connectors between National Forest routes for OHV use.

7. While specific mileage of all existing roads has not been provided, the travel management plan appears to propose that well over 1,000 miles of roads be "administratively abandoned." In consideration of this proposal, the following is pertinent:

    A. No map has been made available that depicts only the locations of the roadways proposed for administrative abandonment. Without such a map, the public is unable to review the proposal in a meaningful way and be made aware of the scope of its impacts.

B. The number of miles of roadway that will be administratively abandoned is not even stated in the "Proposed Action" or the "Significant Issues" sections of the "Summary of the Draft Environmental Impact Statement" at Pages iii-v of the DEIS document.

C. The fact that such roadways have been constructed in the past is evidence that they have been needed for various purposes. There is no correlating analysis stating the known, suggested, or unknown purposes for which the roadways to be abandoned were originally constructed, or whether or not those purposes are deemed to be no longer relevant, or how this conclusion was drawn.

D. The DEIS does not address the fact that existing roadways that may serve as access to future timber sale areas, or other areas involving the use of natural resources, should be preserved. By discontinuing roadways under the proposed plan, future use will require repair or reconstruction with new cost and the potential for additional environmental impacts.

E. Existing roadways may be needed to serve as access during future fire fighting efforts. The DEIS fails to adequately address this very important safety issue.

F. The existence of a "short" stub roadway is not, in itself, sufficient reason for administrative discontinuance of a roadway, regardless of how the roadway was created.

G. Instead of permanently closing roads that need a limited scope of improvements, such roads could be designated on a special list with the understanding that work would be undertaken as funds or volunteer help are available and thereafter the entire road could be added to the inventory.

H. Any roadway that is administratively discontinued as a result of the travel management plan is subject to being scheduled for physical obliteration without a subsequent road-specific public hearing.

I. Any existing roadway that is not presently experiencing erosion should remain open for public use.

8. The DEIS has not addressed how the Plumas National Forest will respond to future County revision of the zoning maps that pertain to developable areas.

9. The DEIS fails to assure the public that the roadway system mapping associated with any subsequent decision will be comprehensive as well as user friendly.

In conclusion, the DEIS is flawed in numerous, significant ways and does not provide adequate information for the public or the decision maker. It is the strong recommendation of the Plumas

County Board of Supervisors that the Plumas National Forest suspend the proposed travel management plan and undertake a comprehensive review of the proposal in coordination with Plumas County staff. We believe that such an approach will result in a travel management plan that is mutually acceptable to the citizens of Plumas County and the users of the Plumas National Forest.

Sincerely,

Sharon J. Thrall

Sharon Thrall
Chair, Board of Supervisors