



October 31, 2016

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*Sent via email*

**RE: Hancock Road Project Scoping**

Dear Lisa,

Thank you for accepting these scoping comments on behalf of the Klamath Forest Alliance and EPIC the Environmental Protection Information Center concerning the Hancock Road Project. The proposed action would authorize reconstruction and use of 0.44 miles of existing non-system road and construction and use of 0.05 miles of new road to allow AP Timber LLC (or its designee) further access and would issue a special use permit for use of the road.

**Purpose and Need**

The purpose and need for the project is in direct conflict with the spirit and intent of the National Environmental Policy Act. The analysis should not justify a decision already made. "The need to approve access" as stated in the scoping notice would be less biased if stated, "there is a need for the landowner to access the private parcel" or "there is a need to analyze reasonable access." The Klamath National Forest (KNF) is not obligated to approve construction of the proposed road, however, it is obligated to provide reasonable access. The use of helicopter to reach the private parcel is reasonable access. It appears from the map provided that there is already access from the northwest portion of this section.

## Existing and Desired Condition

The existing and desired future condition both speak to access on the eastern half of this section. From the map it appears that access to the eastern half could come from the western portion of this section, therefore reasonable access is already available. Further, the only area that may be accessible from the east is a very small portion of the section given the steepness of terrain and the location of Cottonwood Creek.

## Transportation System and Travel Management Rule

The KNF must identify the minimum road system needed of which it can afford to maintain. Adding another road to the system would be contrary to the direction from the Regional Office to work towards ecological restoration. Forest-wide condition surveys indicate that the current road maintenance funding only meets a small portion (approximately 25%) of the annual maintenance needs on the Klamath National Forest. (See KNF Forestwide Roads Analysis page 24). The deferred maintenance backlog for the Klamath exceeds \$55.5 million dollars and will continue to grow until additional funds can be found or road densities are reduced (see KNF Forestwide Roads Analysis page 25). The district must consider the ongoing monetary and environmental effects of adding another road to the transportation system.

## Wildlife and Botany

We are concerned with habitat fragmentation and the effects that the road construction and reconstruction will have on all plant and animal species. This includes Threatened, Endangered, Sensitive, Management Indicator Species, Survey and Manage, Migratory Birds and others. Please disclose if the proposed road is within Critical Habitat or near Activity Centers for Northern spotted owl. Please also analyze and disclose the effects or the proposed road on animal and botanical species and their habitat.

## Watershed and Cumulative Effects

Please analyze and disclose the cumulative watershed impacts of; private logging, yarding, and road construction in conjunction with proposed road work and tree removal on public lands, the increased fire hazard and fire risk to adjacent public lands, the cumulative recreational and scenic impacts of high elevation road construction, tree removal and logging and the effects to water quality.

## Conclusion

In summary, please note that on the north side of the Siskiyou Crest the Rogue River-Siskiyou National Forest has developed and considered helicopter access as a proposed action that provides reasonable access to private industrial timberlands within the federal checkerboard land ownership network. Such an alternative should be developed and considered here. Please also consider that this section of land is currently roaded, so reasonable access already exists. Thank you for considering our comments. Please send future information on this project to the EPIC office.

Sincerely,

Kimberly Baker  
Executive Director  
Klamath Forest Alliance  
And  
Public Land Advocate  
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