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Title: Executive Director

Comments: South Plateau Landscape Area Treatment project Objection

Citizens for Balanced Use formally commented on the South Plateau Landscape Area Treatment project and we are filing this objection on a specific point of the project which we provided comments.

Our objection is in regards to the Forest Service closing and decommissioning roads 1704B, 2543A, 2543B, 1756, 1752, and 478.

These roads are important for access to high quality recreation opportunities which the Forest Service failed to take a hard look at during their analysis. The Forest Service is using a fuel reduction project as a way to amend the Travel Plan. This action is deceptive to the public in avoiding proper notification to the public on their actions. The decision to close and decommission these roads through a fuel treatment project is both arbitrary and capricious by not providing proper notification to the public on a significant action of a Travel Plan amendment. In fact, prior to the release of the Draft EA, the Forest Service wrongfully obliterated portions of road 478 claiming they were planning to remove this road during the project and they had equipment in the area so it was convenient for them to obliterate this road prior to any public notice or EA being released. This shows a complete disregard for public notice, comment, or proper procedure. The action of removing this road prior to the release of the EA indicates the Forest Service had made a predetermined decision to remove this road no matter what information or comments they received from the public. This action is a clear violation of NEPA and ripe for litigation.

The Forest Service did attempt to repair road 478 which was wrongfully obliterated but the obliteration destroyed the road bed. Without extensive work of building a new road bed using the proper material, this road which was once stable and usable, became impassable.

The recreation report in the EA is insufficient in the analysis of road 478 and the quality of recreation experience it presents. The Forest Service is purposefully hiding from the public the true negative impact on the recreating public by using a fuel treatment project as way to amend the Travel Plan. The EA mentions a no net loss of road miles by moving the road but has failed to sufficiently analyze to quality recreation experience of the current road location compared to the proposed relocation. We request the Forest Service take a hard look at the quality of recreation experience of road 478 compared to the alternate route being proposed.

Road 478 provides access to several spur roads which provide dispersed camping opportunities. The EA fails to analyze these dispersed camping opportunities as quality experiences and discounts their importance. The Forest Service seems to believe moving the access to other roads in the area will provide the same opportunities which is false. Road 478 and these spurs are in an area where access to fishing, hunting, and scenic enjoyment is very desirable. The visual experience of road 478 along the river cannot be replaced by moving this access to another route which is in a dry timbered area.

One of the reasons the Forest Service is using to justify the closure of road 478 is based on erosion and sedimentation entering the river. This reason was stated to us during the tour with the District Ranger. We discussed possible solutions to the sedimentation impacts to the river and how they could be easily mitigated during a tour of the area with the District Ranger. No discussion in the EA was presented on any discussions of erosion or sedimentation mitigation that could be implemented. Again, another example of a pre-determined decision of road obliteration without public notification.

We look forward to discussing our objection during the hearing process.

Sincerely,

Kerry White

Executive Director

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