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Comments: Access Management, NEPA, and Forest Plan Questions

I have continued to read and study the SF RAMP Draft EA. I have reviewed available Recreation and Roads study and research information available on the web. Here are the references:

Updated Outdoor Recreation Use Values on National Forests and Other Public Lands

General Technical Report PNW-GTR-658, John Loomis

https://www.fs.fed.us/pnw/pubs/pnw_gtr658.pdf

The Recreation Opportunity Spectrum: A Framework for Planning, Management, and Research

General Technical Report PNW-98 December 1979, Roger N. Clark and George H. Stankey

https://www.fs.fed.us/pnw/pubs/pnw_gtr098.pdf

USDA Forest Service

Road Management Website

1400 Independence Ave., SW Washington, DC 20090

https://www.fs.fed.us/eng/road_mgt/qanda.shtml

Annual recreation use has increased from less than 250 million Recreation Visitor Days (12 hours of on-site use by one or more persons) to more than 800 million and is projected to increase further. An estimated 1.7 million recreational vehicles travel forest roads each day. Eighty percent of this use is on 20% of the system, mostly on roads that are accessible to low-clearance vehicles. An estimated 15,000 log trucks and associated timber harvesting vehicles use forest roads each day, down from 42,000 in 1990.

The policy would apply to all Forests. Forests that have completed access and travel management plans will need to ensure that the plans have incorporated the components of a scientifically based roads analysis procedure in their planning. If not, then the forest needs to do that before road decisions can be implemented.

The Effect of Sediment Deposition on Sierra Riverine Ecosystems Following High-Intensity Fires Nicole Aha, Margot Boorman, Sasha Leidman, & Scott Perry University of California, Davis, Center for Watershed Sciences June 27, 2014

https://watershed.ucdavis.edu/education/classes/files/content/page/Eddy%20Sharks%20Final%20Paper.pdf

This effort has raised more questions than answers than your EA draft has answered. Can you answer or address these questions in your final document?

Recreation:

What studies have been used to show the minimum road density necessary to provide for public access to accommodate the recreational use supply and demand? Why were the above not used or referenced?

What can be done to allow dispersed camping more than one car length from a primary road?

Why does the Forest Service not provide cost analysis information for mitigation measures and costs associated with allowing roaded Motorized Dispersed Recreation use and opportunity compared to closure and obliteration?

Is there any scientific evidence that shows the value of the sediment reduction by limiting use to only motorcycles, ATV's UTV's or TOV's and still leaving the roadbed?

Why has recreation and access not been better represented in the NEPA and Forest Plan process?

Why has the Forest Service not planned for a system of secondary roads and trails to accommodate increases in recreation and disperse use?

Has the forest service properly evaluated the safety issues associated with limiting nearly all motorized recreation traffic to primary roads?

Sediment and Fisheries:

Why do T&E fisheries in the Wilderness area not show any better recovery or population stability than the roaded areas?

How can roads be such a sediment producing concern when they have been in existence for over 75 years and are still usable and stable?

Why do hatchery and native returns show a similar return impact when sediment is not a factor for the hatchery program?

Can you quantify that reducing 80 tons of sediment over nearly 200 miles of roads justifies not keeping Key access routes open to trailheads, Roadless areas, and popular destinations such as high mountain lakes.

Is there a measurable sediment value to closing the road to the public but leaving the road open to mining, private and/or administrative use?

Is the impact of sediment any different if it is a given distance or downstream of spawning grounds?

Why does landscape level fire produced sediment and stream channel alterations not have the same or greater concern then road sediment?

Is the effect of road sediment impacted, reduced, or negated by landscape level fire produced sediment?

How can sediment and stream channel erosion be separated from road impacts verses fire impacts?

Why is the value of constructed existing roads and bridges not shown in the decision process to close or obliterate roads?

What percent of the fish habitat has been restored and recovered and what affect has it had on fish returns?

How much money has been spent on fish recovery and restoration since 1960?

Forest Plan:

Have you completed a scientically based roads analysis? If so where can it be referenced?

Why is resource protection the only achievable objective of the forest plan?

Why the reductions of roads are not considered a significant loss to Recreation Opportunity and require an EIS?

Are Special interest groups supporting extreme measures of resource protection and road closures to covertly further their cause, especially wilderness?

Why are special interests groups allowed and selected to dominate the collaborative groups?

What assessment is performed to assure that no conflict of interest exist in the collaborative group members?

Why do the results of the collaborative groups dominate the NEPA process rather than public comment?