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Comments: The Paragraph on p. 55 of the draft plan needs to be omitted as it is a false statement.

\* To maintain existing access to National Forest System lands from historic roads, the Forest Service will work with counties in the event of potential loss of such historic access. Such historic roads are public roads rather than National Forest System roads, unless there is an express easement to the United States or a reservation in a conveyance from the United States.

The Forest service is well aware that not all historic roads are public roads as stated in this paragraph. In fact, p.13 of the 2010 travel management plan states that a landowner controls access through their land if there is no legal mechanism in place such as an easement or right of way.

A public road needs to be a legally documented right of way or needs to be proven through certain criteria in a court of law.

The assumption of all historic roads are public roads is false unless the criteria is explained.

Statements like this will likely leave a gray area to ownership of private land and will certainly lead to future litigation.