

**Recreation Outdoor Coalition
4000 Beacon Drive
Anderson, California 96007**

May 28, 2008

Kathleen Morse
Forest Supervisor
Lassen National Forest
2550 Riverside Drive
Susanville, CA 96130

Dear Kathleen;

We appreciated the opportunity to meet with Chris O'Brien and Allen Nosler on May 20th to receive an update on the route designation process (RDP) and the Forest's OHV grants. Per their suggestion, I have enclosed ROC's proposal for route designation for the Lassen National Forest (LNF). Over the past month, ROC has reviewed all non-system routes and selected those that represent our members' views. We identified both system and non-system routes that create access to loops, vistas, and primitive campsites.

In preparing this proposal and the accompanying spreadsheets, we used the following information:

- LNF WEB maps dated June 8, 2007
- LNF OHV Resource Concern Maps dated September 11, 2006
- LNF OHV Route Resource Concerns spreadsheet dated August 2006
- LNF Final ML 3-5 Roads Analysis dated November 2006
- LNF INFRA Road Linear Events dated April 28, 2008
- LNF Share the Dream Traffic Study and Engineering Analysis dated September 2005

Key items associated with our route designation proposal include the following:

1. Allow non-highway legal vehicles on all unpaved passenger car roads unless a rare exception exists. Per the above databases, these roads are almost all single lane with design speeds less than 25 mph with average daily traffic (ADT) lower than 40. Non-highway legal vehicle travel has occurred on most of these roads for decades with no documented mixed-use accidents. FS passenger car roads provide important links to the LNF's ML 2 road system and motorized trails. It is ironic that the 17 Road from Mineral to the McGowan Lake Road is signed as a "shared use bicycle route", but is considered unsafe for motorized mixed use by your engineering staff. It has been safely used by OHVs from the community of Mineral for decades and is their primary access to the LNF. "Share the road" information, maps, and/or road signs will greatly enhance visitor safety on mixed use roads. None is currently provided now.
2. Allow non-highway legal vehicles on all unpaved county roads with county concurrence. Unpaved county roads provide important connectors to the LNF's road system. Per personal

discussion with Lassen and Plumas County sheriffs, they do not enforce State restrictions on non-highway legal vehicle travel. ROC will be proposing this to all County Boards of Supervisors and Public Works Departments for their review and decision.

3. For selected passenger car roads, lower their operational maintenance level (ML) to reduce maintenance costs. Based on the LNF's own roads analysis, you have several roads with ADTs less than 40 with moderate to high maintenance costs. The Forest's INFRA Road database also shows several objective ML 3 and 4 roads with lower operational MLs. ROC doubts the Forest's constrained road budget will ever allow you to fully meet FS road maintenance standards for all your passenger car roads. If MLs need to be temporarily raised to provide more economical commodity haul, do it at that time, then drop back to a lower operational maintenance level when the project is completed. Passenger cars can still be driven on ML 2 roads if drivers choose to do so. Most of the vehicles on LNF roads are high clearance (from a 2005 LNF Traffic Count and Engineering Analysis). Please refer to the attached ML paper that summarizes current national FS policy and ROC's suggestions.
4. Designate routes that access most primitive campsites. However, many popular sites need to have a parking area defined to reduce current impacts to riparian areas. This is consistent with direction in your Land and Resource Management Plan (as amended).
5. ROC did not identify all non-system routes or paved roads that access LNF developed recreation sites, trailheads, permitted uses, and other recreation sites. We assume your staff will add these routes to the LNF road system and motor vehicle use map (MVUM).
6. As noted on the attached spreadsheets, ROC recommends separate travel management planning near some communities where there is a proliferation of non-system routes (Spalding, Johnson Park, Prattville/Chester/Lake Almanor, etc). This should be a collaborative exercise with the public and respective counties. It may take more time than you have under your constrained schedule to complete phase I of route designation by December 2008. Otherwise, please request an extension to allow more comprehensive area planning with these communities.
7. Due to current State OHV grants and committed deliverables, ROC did not identify non-system routes and access to primitive campsites in the High Lakes and Front Country OHV Areas. Please add my name to your NEPA/public scoping mailing lists for these two areas.
8. ROC identified the non-system routes important for our members and for public access (both motorized and non-motorized). This amounts to approximately 202 miles out of the 1,158 miles that were inventoried (or 18 percent). Most the non-system routes ROC recommends should be added as motorized trails. The enclosed spreadsheets also include recommended non-system routes from the Districts or ones they wanted to field check. This increased the mileage to approximately 315. We have color coded the District routes on the spreadsheets. ROC recommends you defer designating any District non-system routes proposed solely for FS administrative access. Your focus right now should be on the non-system routes desired for public access. Please note, ROC also proposed some changes to LNF system roads.

9. Some routes have up to six resource concerns associated with them according to your GIS and pivot table data. ROC believes many of these concerns can be mitigated. Upon release of the DEIS, we will be requesting the specific reasons and field analysis why a route is rejected.
10. With the exception of groomed snowmobile trails, ROC did not identify a season of use although some routes may benefit from this when road or trail surfaces are wet or for other resource reasons. The Travel Management Rule allows the FS to adopt seasons of use and emergency closures. We suggested year-round use unless your staff proposes something different and provides appropriate rationale in the DEIS. Please apply a wheeled vehicle restriction to all groomed snowmobile trails from December 25 to March 31. This will prevent rutting of the trails and eliminate safety concerns.
11. Preliminary 2007 documentation for engineering judgments on selected LNF passenger car roads (e.g. Hog Flat area) contained statements that the straight road alignments and vehicle-hiding vertical curves provide for closing speeds in excess of 90 miles per hour and a severe crash probability (per Tim Dedrick). These conclusions are without merit and do not represent how prudent people drive or react when approaching another vehicle. First, prudent drivers do not drive 45 mph on unpaved LNF roads due to wash boarding, potholes, dust, and unexpected road hazards (windfall, rocks, washouts, etc.). The LNF INFRA Road database contains no Forest Service roads where the design speed is 40 or 45 mph. The database shows the majority of the LNF's passenger car roads are unpaved, single lane, have design speeds of 5 to 20 mph with a traffic service level of C (flow interrupted, use limited) or D (slow flow or may be blocked). Second, prudent drivers slow down or even stop to allow an approaching vehicle to pass. Since almost all LNF passenger car roads are single lane (with some turnouts), you have to slow down to pass. Biased, inaccurate engineering data will be challenged if these preliminary conclusions stand in your final engineering analyses.
12. Also enclosed is ROC's position paper that we sent to the WO last month. This paper documents our concerns and offers suggestions to improve the route designation process and provides suggested national policy direction. Current regional direction regarding mixed use should be amended to reflect differences between California national forests and public OHV travel. A "one size fits all" regional rule for conducting mixed use analysis on passenger car roads is neither helpful nor wise.
13. An active volunteer program is absolutely essential in having well managed recreation and OHV programs in California national forests. ROC has suggestions on how you can ramp up your volunteer program through personal outreach, WEB and other marketing, staff organization, and volunteer/FS recognition. Successful models exist. The LNF just needs to implement them. ROC's April position paper lists our past volunteer projects on the LNF. Enclosed is the current list of projects our volunteers are interested in helping LNF staff with.

ROC would like to work with your RDP staff to have our proposal included as an alternative in the LNF's DEIS. ROC's RDP team and I would appreciate the opportunity to discuss the above items with you in more detail in the near future. Thank you.

Sylvia Milligan

Chair, Recreation Outdoor Coalition

Enclosures:

ROC May 2008 Travel Management DEIS Alternative Spreadsheet
ROC May 2008 Maintenance Level Paper and FS Policy
ROC May 2008 Proposed Lassen National Forest Volunteer Projects
ROC April 23, 2008 Route Designation Position Paper and WO Letter

cc: Gregg Mumm, BlueRibbon Coalition
Don Amador, BlueRibbon Coalition
Dave Pickett, American Motorcyclist Association
Don Spuhler, Don Klusman, and John Stewart, California Association of 4 Wheel Drive Clubs, Inc.
Lois Silvernail, California Off-road Vehicle Association
Robert Reed, California League of Off Road Voters
Fred Wiley, Off Road Business Association
Tom Crimmins, National Off-highway Vehicle Conservation Council
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Honorable John Doolittle
Honorable George Radanovich
Honorable Dan Lungren