



# Sierra Pacific Industries

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April 4, 2014

Mike Crump, Director  
County of Butte, Public Works  
7 County Center Drive  
Oroville, CA. 95965

Dear Mr. Crump:

The purpose of this letter is to deliver comments regarding the proposed Butte County, Department of Public Works, Ground Operations application grant to the California Off-Highway Motor Vehicle Recreation Division. (OHMVR).

Sierra Pacific Industries (SPI) is a family owned company in the business of growing and harvesting forest products. SPI timber lands are managed under the "[Sustainable Forestry Initiative](#)" in order to provide forest products while providing clean water, wildlife habitat and other resource values. To ensure that all natural resources on SPI properties are managed in a sustainable manner, SPI is directed to follow the California Environmental Quality Act (CEQA) and all rules and regulations contained in the Z'berg-Nejedly Forest Practice Act of 1973.

SPI will focus on the following topics: the proposed "maintenance activities on the County-maintained Concow and French Creek Roads" and the "improvement of motorized access to provide nonmotorized recreational opportunities" which are both discussed in the plan application.

SPI has a neutral position of the application's road maintenance activities and the goal to increase recreational opportunities on the Plumas National Forest ML2 roads. We do however have concerns regarding the impacts this proposal will have on adjacent SPI properties and resources.

The application from Butte County also proposes to maintain Concow Road from its "intersection with Rim Road some 25 miles to the north to Philbrook Reservoir." SPI is the primary land owner affected by this proposal with 72.68 percent of land ownership adjacent to Concow road. Thus, this grant proposal could have a significant effect on SPI private roads and timber land resources.

SPI does have concerns that Butte County may not truly understand the scope of the maintenance issues which exist on the Concow and French Creek roads. SPI is also troubled with the concept of "improvement of motorized access to provide nonmotorized recreational opportunities".

## Maintenance activities on the County-maintained Concow and French Creek Roads

SPI supports the county in their desire to improve the native surface road network.

As a land owner with thousands of miles of native surface roads, SPI fully understand the challenge and the expense of maintaining these assets. SPI spends hundreds of thousands of dollars each year on the Stirling District road system for maintenance and drainage improvements. This is a yearly expense. SPI has observed that our road maintenance work lasts longer if motorized vehicles use is controlled. SPI policy on our privately owned roads prohibits the unauthorized use of motor vehicles. Authorized use generally includes provisions for road maintenance during use. These provisions include road watering and periodic grading of roads

The contractors hired by SPI to perform road maintenance are required to have insurance with a minimum limit of two million dollars for each of the following: commercial general liability, auto liability and property damage. In addition, all contractors adhere to SPI Fire Policy which has provisions for weather related shutdowns, on-site fire suppression tools, fire incident action plans files with CDF and prompt communications with fire agencies.



The proposed maintenance activities on county roads are adjacent to our timberlands. The work will result in unavoidable contact with SPI property. The proposal also states that volunteer help will be on site. These men and equipment will expose SPI to certain risks. SPI would need assurances that operations would meet SPI insurance and fire preparedness standards.

In the grant application, the question is asked whether any rerouting of roads or trails is proposed. The answer was no.

SPI believes that answer demonstrates that the county may not truly understand the extent of the maintenance issues which exist on these roads. There are many portions of Concow and French Creek roads that require rerouting to avoid sections of roads which are beyond repair with maintenance activities.

These legacy road sections have been discharging sediment into the state's watercourses for many years. Areas near Rag Dump, Granite Springs and Ramsey's Bar are just a few sites where watercourse and spring location are adjacent to the road. Road rerouting is the only long term solution to this type of sediment discharge.

There are other locations on these roads which have tall cut banks on both sides of the road. Over time, these sections of road have been graded down below the water table, and sink holes have developed. There is no opportunity to remove water off these sunken road surfaces. Rerouting would be appropriate at these locations.

#### Improvement of motorized access to provide nonmotorized recreational opportunities

SPI has gated their private roads which intersect with the Concow Road. These gates are posted with our road use and land use policy. These protective policies include a prohibition of the unauthorized use of motor vehicles on our private roads and the exclusion of camping or camp fires on SPI properties. We have staff that patrols our property that enforces these policies.

Despite these posted prohibitions and patrol, the illegal use of motor vehicles, especially off-highway vehicles (OHV), continue to cause environmental damage to SPI private roads and timber lands. SPI has no designated campgrounds. There still is unauthorized camping on our timberlands. There are no known Forest Service campgrounds accessed by the Concow and French Creeks roads.

In 2008, SPI properties in Butte and Plumas counties were impacted by numerous lightning caused fires.

SPI has replanted the acreage of company timberland that was impacted by these fires. Unfortunately, many of these plantations have been negatively impacted by the establishment of unauthorized OHV trails traveling off from Concow Road.

(Photos 1 and 2). These unauthorized OHV trails have killed planted trees and significantly increased sedimentation flow. There are several streams in this area and the sedimentation has resulted in impacts to water quality. Many OHV users have utilized SPI company ownership as "OHV staging areas". OHV's users will unload their recreation vehicles on SPI properties and utilize SPI private lands to create unauthorized OHV routes of travel or as OHV open areas of travel.

Additionally, a high percentage of the illegal campers on SPI properties along Concow Road have OHV recreational vehicles. This illegal camping results in illegal trash dumping, illegal camping and camp fires and wood theft to fuel these camp fires. Several of these illegal camp sites are situated adjacent to fish bearing watercourses such as Kimsheew Creek at Ramsey Bar. These illegal camp sites result in destruction of riparian vegetation from OHV use which causes accelerated sedimentation of granitic soils into the nearby watercourses. (Photo 3).

SPI landholdings adjacent to French Creek Road are not as extensive as the Concow Road.

French Creek is a fish bearing watercourse and a tributary to the West Branch of the Feather River. The same environmental degradation and illegal use of SPI private timberland discussed above relating to the Concow Road proposal occurs in this area from the unauthorized use of OHV's. Illegal camping and OHV free play results in the movement of soil into French Creek. (Photo 4).

Butte County's application does not address how they intend to mitigate the illegal trespass of OHV's onto adjacent private properties or protect natural resources damage from the use of OHV's. The 2014 Law Enforcement OHV proposed project from the Butte County Sheriff's Department does not address any inclusion of law enforcement patrols to deal with illegal OHV activities on private lands.



While SPI remains neutral on the portion of the Butte County Ground Operations proposal regarding Plumas National Forest ML2 roads, we have concerns regarding the impacts this proposal will have on adjacent SPI properties and resources.

To mitigate these impacts, we are requesting that this portion of the proposal be amended to include funding and maintenance regarding signage to indicate private property adjacent to Plumas National Forest, including the posting of "No Trespassing", "No OHV Staging" and "No Camping Signs".

We are also requesting that the Ground Operations proposal include OHV staging areas on the Plumas National Forest Properties which are not near SPI properties. Additionally, we request that the Grounds operations plan make OHV funds available and authorize "Civilian Conservation Corps or other qualified third party contractors and volunteers from local OHV clubs" to construct, under the direction of SPI, barriers or water bars on illegal OHV routes of travel that have traveled off Plumas National Forest ML2 road onto SPI properties.

To summarize, SPI is concerned that an increase of authorized OHV recreational use on Concow and French Creek road may result in significant natural resource degradation and damage to timberlands owned by SPI. I appreciate the opportunity to comment on this grant proposal. Please contact me if you have any further questions.

Sincerely;

Steve Roberts

Sierra Pacific Industries

District Manager, Stirling District

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