

SIERRA COUNTY

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17 March 2015

State of California-Department of Parks and Recreation
OHMVR Division
1725 23rd Street, Suite 200
Sacramento, California 95816

Subject: South Yuba River Citizens League (SYRCL) Restoration Application for Funding on the Tahoe National Forest-Sierra County

Dear Members of the State Commission and OHMVR Staff:

This purpose of this letter is to convey strong opposition concerning a grant application filed for the current funding cycle under the OHV Grant Program consisting of a restoration and road closure project on the Tahoe National Forest jointly sponsored by the Tahoe National Forest and the South Yuba River Citizen's League (SYRCL). This project is located north of the community of Downieville in Sierra County and the Sierra County Board of Supervisors on March 17, 2015 adopted a position of strong opposition and authorized the transmittal of this letter.

While this Board of Supervisors supports increased public recreation activities and opportunities in Sierra County, this proposed project will decrease public access to National Forest system lands. This proposed grant application was accomplished without any advance public notice from the grant applicant or the Tahoe National Forest and this absence of professional courtesy coupled with our strong opposition to the obliteration of public access opportunities is the foundation for the County's opposition. Sadly, the existence of this grant application for funding involving the Tahoe National Forest and its non-profit partner only came to our knowledge through the efforts of an informed citizen.

The Board of Supervisors is aware through the Tahoe National Forest-Travel Management Plan that some roads were subject to proposed closure. However, the closure of a road and the obliteration of a road and historic public access are two distinctly different actions and we deplore a process that appears to be one of less than full disclosure. The National Forest made the Travel Management Plan public, however, its implementation appears to now be working through an outside non-profit organization to take a second, and albeit, more permanent step to destroy public access transportation routes within Sierra County. A closed road can be monitored for a number of years to observe the extent of overall impact to a general region while an obliterated road is lost forever. We encourage and expect a more responsible, inclusive, and

transparent process to this effort. While the proponents suggest these roads cause resource impacts and said roads are no longer needed, there is no evidence of this conclusion in any documents supporting the proposed project. We ask that this program not proceed in order to allow an inclusive discussion over the evaluation of the impact of closure and obliteration of these roads over time.

While this grant application is proposing to remove up to 3.75 miles of Sierra County roads, we offer the following comments:

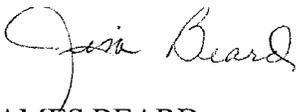
1. Some of these roads give the only vehicular access to public lands used by a variety of recreationalists, not all able to navigate narrow routes or using single track vehicles. The obliteration of these routes will disenfranchise those with varying degrees of mobility and disability.
2. Some of these roads are important for fire suppression as well as search and rescue activities in order to rapidly reach public lands visitors with full size vehicles with necessary medical equipment. The specific route from an area commonly known as the "A Tree to Spencer Creek" is the only such road to that site and an example of such need.
3. The area of Sierra County is 980 square miles of which 70% is National Forest system lands and the specific portion of Sierra County that comprises the Yuba River Ranger District of the Tahoe National Forest approaches nearly 90% National Forest system land ownership. Sierra County's population is now approximately 3,000 persons and was reduced a full 10% over the last decennial census. Such facts make the erosion and watershed concerns in any part of the county somewhat disingenuous when one compares any level of development to any of our neighboring counties.
4. Sierra County's current economic status is fragile and is in a great part due to the current management of the nation's National Forest system and its ignorance or sheer lack of concern for communities within its boundaries. Any actions, such as those proposed by this application, have the potential to discourage use of the National Forest and therefore negatively impacts local economic conditions. In addition, a number of these routes have a deep cultural and historic tie to the mining history of Sierra County. The above described "A Tree" route was an early and primary route from the Downieville mines region to the Johnsville area of Plumas County. To our knowledge, no review or comment has been sought from other interested stakeholders such as the Sierra County Historical Society, the Plumas County Historical Society, Plumas Eureka State Park, the Downieville Museum, or the State Historic Preservation Officer.
5. Instead of these discreet applications by entities working from outside of the County's borders, we would welcome these same institutions to work with the County to develop programs that could be developed with the input of all. The applicant acknowledges no public input as a part of this application process and the avoidance of any notification to the local County Board of Supervisors should not only alarm the funding agency but casts a dubious shadow on the entire project. Furthermore Sierra County has invoked the formal coordination process with the Tahoe National Forest and this effort to work with a non-profit partner for such an effort appears to be clearly not in compliance with that coordination process required of a federal agency.
6. There is no indication that a proper or lawful environmental review has been conducted for this specific project. The State Department of Parks and Recreation has an obligation to comply with the California Environmental Quality Act as part of its funding and project approval process and the National Forest has clear obligations under the National Environmental Policy Act (NEPA) to evaluate the impacts of its proposed actions. There

appears to be no record of a decision under NEPA and reliance by the National Forest on a programmatic document such as the OHV Travel Management Plan is no substitute for site specific or project specific identification of environmental impacts created by a road closure or obliteration of public access.

We appreciate this opportunity to comment, albeit later in your grant application review process. While we have no background of working with SYRCL, this application and its lack of transparency and tie to the Tahoe National Forest continues a litany of actions taken or proposed in which the local community and local government is kept in the dark on matters of public interest. Sierra County strongly opposes this grant application and would request that the State Department of Parks and Recreation identify how this Board can be kept informed on the status of the application review. Thank you for your consideration.

Sincerely,

SIERRA COUNTY
BOARD OF SUPERVISORS



JAMES BEARD
Chairman of the Board

Cc: Assemblyman Brian Dahle
Senator Ted Gaines
SHPO
Sierra County Historical Society
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