



United States  
Department of  
Agriculture

Forest  
Service

May 2016



# Environmental Assessment

## Forest-wide Unauthorized Route Decommissioning

Cleveland National Forest  
Orange, Riverside, and San Diego Counties, California



Location of Action: National Forest System lands on the Cleveland National Forest in Orange, Riverside, and San Diego Counties, California

Type of Document: Environmental Assessment

Lead Agency: USDA Forest Service

Responsible Official: Forest Supervisor, Cleveland National Forest

Contact Person: Jeff Heys, Forest Planner  
Cleveland National Forest  
10845 Rancho Bernardo Road, Suite 200  
San Diego, California 92127

*The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).*

*To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410, or call (800)795-3272 (voice) or call (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.*

# Table of Contents

**1 - Introduction ..... 1**

    1.1 Document Structure .....1

    1.2 Location .....1

    1.3 Purpose and Need for Action .....2

    1.4 Decision Framework .....3

    1.5 Public Involvement .....4

    1.6 Issues .....4

**2 - Alternatives, including the Proposed Action..... 4**

    2.1 Alternative 1: No Action .....4

    2.2 Alternative 2: Proposed Action .....5

    2.3 Comparison of Alternatives .....27

**3 - Environmental Consequences ..... 28**

    3.0.1 Scope of Cumulative Effects Analysis .....28

    3.1 Physical Environment .....28

        3.1.1 Soils and Water .....28

        3.1.2 Air Quality.....37

    3.2 Biological Environment .....39

        3.2.1 Threatened and Endangered Species .....39

        3.2.2 Regional Forester’s Sensitive List Species.....42

        3.2.3 Management Indicator Species.....43

        3.2.4 Weed Risk Analysis .....44

    3.3 Social Environment .....44

        3.3.1 Recreation and Public Safety .....44

        3.3.2 Cultural Resources .....45

**4 - Persons, Groups, Organizations, and Agencies Consulted ..... 47**

**5 - References ..... 47**

**List of Tables**

    Table 1. Lengths and numbers of routes proposed by action type and Ranger District. ....5

    Table 2. Proposed Action by route .....9

    Table 3. Comparison of Alternatives.....27

    Table 4. Riparian Conservation Areas.....29

    Table 5. Federal and State air quality attainment status for the San Diego Air Basin .....37

    Table 6. Federal and State air quality attainment status for the South Coast Air Basin .....37

    Table 7: Potential sensitive receptors within and near the project .....38

    Table 8. Alternative 2 total modeled emissions. ....39

**Appendix A - Responses to Comments.....48**

    Access.....48

    Recreation Management.....56

    Carveacre Road .....76

    UND114 .....87

    Border Patrol .....100

    Natural Resource Concerns .....104

    Cultural Resource Concerns .....122

    NEPA Process .....123

---

**Appendix B - Alternative 2 Maps ..... 128**

Anderson Valley, Capitan Grande Indian Reservation Area.....129

Bear Valley Area.....130

Boulder Creek Road South Area.....131

Buckman Springs Area.....132

Carveacre Area.....133

Corte Madera Area.....134

El Cajon Mountain Area.....135

Hauser Wilderness Area.....136

Japatul Valley Road Area.....137

Kitchen Creek Central/Sheephead Area.....138

Kitchen Creek North/Wooded Hill Area.....139

Kitchen Creek South Area.....140

Lake Morena Area.....141

Long Valley Area.....142

Mount Laguna Area.....143

Pine Creek Area.....144

Tule Springs Area.....145

Boulder and Cedar Creeks Area.....146

Boulder Creek Road Area.....147

Cedar Creek Area.....148

High Point Area.....149

Inaja & Upper San Diego River Area.....150

Indian Flats Area.....151

Pamo Valley Area.....152

Will Valley Area.....153

Bedford Area.....154

Elsinore Peak Area.....155

Fox Spring & Lucas Canyon Area.....156

Long Canyon & Ortega Highway Area.....157

Margarita Peak Area.....158

North Main Divide Area.....159

Silverado Canyon Area.....160

Trabuco Canyon Area.....161

Wildomar - South Main Divide Area.....162

---

# 1 - INTRODUCTION

## 1.1 - Document Structure ---

The Forest Service has prepared this Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal laws and regulations. This Environmental Assessment (EA) discloses the direct, indirect, and cumulative environmental impacts that would result from the Proposed Action and alternatives. The document is organized into four chapters:

- *Chapter one - Introduction:* This section includes information on the existing condition and purpose and need for the project, including a summary of Cleveland National Forest Land Management Plan direction as it relates to the project. This section also provides an overview of how the Forest Service informed the public of the Proposed Action.
- *Chapter two - Alternatives, including the Proposed Action:* This section provides a description of the Proposed Action as well as possible alternative methods for achieving the stated purpose. These alternatives were developed based on issues raised internally, by the public, and by other agencies.
- *Chapter three - Environmental Consequences:* This section describes the environmental effects of implementing the Proposed Action and alternatives. This analysis is organized by resource. Within each section, relevant information on the affected environment is described, followed by the effects of the No Action Alternative that provides a baseline for evaluation and comparison of the other alternative.
- *Chapter four – Persons, Groups, Organizations, and Agencies Consulted:* This section provides an overview of the persons, groups, organizations, and agencies consulted as part of this project.
- *Chapter five – References:* This section lists the references to published and unpublished sources cited in the body of the EA.
- *Appendices:* The appendices include responses to the comments received during the project’s scoping and comment periods as well as the maps of the Proposed Action.

Additional documentation, including more detailed analyses of the project’s effects on natural resources, additional background information, and public comments, may be found in the project record located at the Forest Supervisor’s Office in San Diego, California.

## 1.2 - Location ---

The project area includes unauthorized routes that are scattered across all three Ranger Districts of the Cleveland National Forest. Numerous maps of the Proposed Action are included in Appendix B to provide detailed location information by route.

---

## 1.3 - Purpose and Need for Action

---

Motorized use of the Cleveland National Forest is regulated by its 2005 Land Management Plan and its 2008 Motorized Travel Management decision, both of which involved substantial public input. To summarize their direction, roughly 200 miles of Forest roads are open only to highway-legal vehicles, while an additional 80 miles of roads and trails are open to off-highway vehicles (OHVs). Public motorized use of the National Forest is restricted to these routes in order to prevent resource damage. Nevertheless, an estimated 100 miles of user-created, unauthorized routes exist on the Cleveland National Forest, and their use and lack of maintenance leads to a variety of impacts to sensitive resources.

Nearly three-quarters of known unauthorized routes pass through the habitats of federally-listed threatened and endangered species, not to mention other sensitive species. Over half of the routes cross or follow riparian areas, thereby contributing to soil erosion, habitat degradation, and water quality impacts. One-quarter of the routes lie within areas managed as Wilderness, where vehicles are prohibited altogether, or Inventoried Roadless Areas, where road-building is particularly restricted. Fifteen percent of the routes pass through known archaeological sites, presenting risks to priceless resources. Finally, unauthorized routes contribute to other illegal activities on the Forest, such as dumping, target shooting, and dispersed campfires, that can lead to costly and damaging wildfires.

The primary purpose of this project is to decommission the highest priority unauthorized routes on the Cleveland National Forest, returning the landscape to its desired condition and educating and directing motor vehicle users to legal opportunities. A secondary purpose is to make minor adjustments to the National Forest Road and Trail Systems that are needed to provide for public or administrative access or to prevent resource impacts and safety issues.

### **Relevant Cleveland National Forest Land Management Plan Direction**

The Proposed Action works toward the forest management goals as described in the 2005 Revised Cleveland National Forest Land Management Plan (LMP) (USDA, 2005) and is expected to meet the following guidance in particular:

Goal 3.1 of the LMP directs the Cleveland NF to remove roads and trails that have been determined to be unnecessary by Roads Analysis and National Environmental Policy Act analysis for landscape restoration. The transportation system of roads and trails is safe, affordable, and environmentally sound; responds to public needs; and is efficient to manage.

Goal 3.2 directs the Cleveland NF to retain a natural evolving character within Wilderness.

Goals 5.1 and 5.2 direct the Cleveland NF to improve watershed conditions and riparian conditions.

Goal 6.2 directs the Cleveland NF to ensure that habitats for federally listed species are conserved and that listed species are recovered, or moving toward recovery.

#### **Part 2: Strategy**

##### **Trans 2 – Unnecessary Roads**

Reduce the number of unnecessary or redundant unclassified roads and trail and restore landscapes.

- 
- Decommission roads and trails that have been determined to be unnecessary for conversion to either the road or trail system through site-specific analysis.
  - Establish the level of restoration through project planning.

### Part 3: Standards and Guidelines

CNF S3: Off-highway vehicle use is limited to designated routes and areas.

S9: Design management activities to meet the Scenic Integrity Objectives (SIOs) shown on the Scenic Integrity Objectives Map.

S11: When occupied or suitable habitat for a threatened, endangered, proposed, candidate or sensitive (TEPCS) species is present on an ongoing or proposed project site, consider species guidance documents to develop project-specific or activity-specific design criteria. This guidance is intended to provide a range of possible conservation measures that may be selectively applied during site-specific planning to avoid, minimize or mitigate negative long-term effects on threatened, endangered, proposed, candidate or sensitive species and habitat. Involve appropriate resource specialists in the identification of relevant design criteria.

S12: When implementing new projects in areas that provide for threatened, endangered, proposed, and candidate species use design criteria and conservation practices so that discretionary uses and facilities promote the conservation and recovery of these species and their habitats. Accept short-term impacts where long-term effects would provide a net benefit for the species and its habitat where needed to achieve multiple-use objectives.

S24: Mitigate impacts of on-going uses and management activities on threatened, endangered, proposed, and candidate species.

S35: Manage dispersed recreation activities to ensure that environmental sustainability is maintained by utilizing the following measure: motorized and non-motorized vehicle travel is restricted to National Forest System roads and trails and limited areas that are designated for vehicle use.

S47: When designing new projects in riparian areas apply the Five-Step Project Screening Process for Riparian Conservation Areas as described in LMP Appendix E - Five-Step Project Screening Process for Riparian Conservation Areas (RCAs).

S50: Mitigate negative long-term impacts from recreation use to soil, watershed, riparian or heritage resources.

## **1.4 - Decision Framework**

---

The environmental assessment (EA) discloses environmental effects of the No Action alternative and the Proposed Action. The **Responsible Official, the Forest Supervisor**, will make a decision based on the review of the EA. The Forest Supervisor's decision will include:

1. Whether to proceed with the Proposed Action or No Action alternative.
2. Whether the decision that is selected would have significant impacts. If a determination is made that no impact would be significant, then a "Finding of No Significant Impact" (FONSI)

---

would be prepared. Significant impacts would require the preparation of an Environmental Impact Statement [40 CFR 1501.4 (c) and (e)].

The Forest Supervisor's decision will be documented in a separate Decision Notice (FSH, 1909.15 - 40).

## 1.5 - Public Involvement

---

The proposal was first listed in the Schedule of Proposed Actions in February 2014. A letter announcing a 30-day scoping period was sent to 978 individuals and organizations anticipated to have interest in the Proposed Action on February 17, 2015. Altogether, 206 scoping comments were received during the 30-day scoping period.

The Draft EA was made available on December 4, 2015, for public review prior to the publication of a legal notice in the *San Diego Union-Tribune* on December 18, 2016, to initiate a 30-day comment period. Everyone who expressed interest in the project during scoping was notified about this opportunity directly, as were newly identified parties that might be interested. Due to an unexpected website malfunction during the final three days of the comment period, the period was extended for an additional three days. Altogether, 91 comments were received during the comment period.

All input received during the scoping and comment periods was considered by an interdisciplinary team. The comments either resulted in changes to the proposed action or did not generate significant issues related to the proposal. Responses to these comments can be found in Appendix A.

## 1.6 - Issues

---

Based on internal and external scoping, the interdisciplinary team developed a list of issues. The team decided the following issues warranted full analysis in this EA to determine their significance and/or contributed to project design features.

- **Impacts to soils and water:** specifically erosion and compaction resulting from unauthorized routes and water quality both on site and downstream.
- **Impacts to air quality:** including dust and greenhouse gas emissions.
- **Impacts to biological resources:** including federally listed threatened and endangered species, Forest Service Management Indicator Species, R5 Regional Forester Sensitive Species, and invasive weeds.
- **Impacts to recreation and public safety:** specifically recreation access, the quality of visitor experiences, scenery, and safety.
- **Impacts to cultural resources:** including pre-historic and historic sites.

## 2 - ALTERNATIVES, INCLUDING THE PROPOSED ACTION

This chapter describes and compares the alternatives considered for this project. This chapter includes a description of each alternative and a table that allows for the comparison of the alternatives.

## 2.1 - Alternative 1

### No Action

Under the No Action alternative, no unauthorized routes would be decommissioned, and no changes would be made to the Cleveland National Forest Road or Trail Systems. The Cleveland National Forest Land Management Plan and Motorized Travel Management decision of November 12, 2008, would continue to restrict motor vehicle use to certain routes. Accordingly, the use of unauthorized routes by motor vehicles would remain illegal.

## 2.2 - Alternative 2

### Proposed Action

The unauthorized routes and National Forest System Roads proposed for decommissioning are shown in Tables 1 and 2 and associated maps (found in Appendix B), along with the proposed management recommendation by route. For most routes, restoration would be accomplished through earthwork by heavy equipment or by hand and the installation of pipe-rail barriers or boulders to prevent re-entry. Particular routes would require additional strategies to prevent resource impacts, including seeding of native plant species where disturbance would exceed 10 feet in width. Signage would be installed at each site to direct riders to authorized areas for vehicle use. Finally, each site would be monitored annually for a period of five years, to ensure that the barriers remain effective at preventing re-entry and that soil erosion has been reduced.

Unauthorized routes that would be added to the National Forest Systems as administrative or public Roads and non-motorized or motorized Trails are also shown on the maps and in the tables. The only routes proposed for addition to these Systems were those with an identified, legitimate need and without resource concerns. These routes would be improved through earthwork, signed as appropriate, and maintained over time to prevent resource impacts. “Add for Administrative Use” refers to incorporating a route into the National Forest Road System only for administrative use, not for public use. “Add for Public Use” refers to incorporating a route into the National Forest Road System for public use, with the exception of a single route off Bear Valley Road that would become a motorized, 50-inch-wide National Forest System Trail. “Add for Non-Motorized Use” refers to incorporating a route into the National Forest Trail System as a non-motorized trail. All Road additions would be maintenance level 2, which means open for use by high-clearance vehicles.

**Table 1.** Lengths and numbers of routes proposed by action type and Ranger District (DRD: Descanso, PRD: Palomar, and TRD: Trabuco).

Action Type	Length in Miles				Number of Routes			
	Total	DRD	PRD	TRD	Total	DRD	PRD	TRD
Add for Administrative Use	1.7	1.4	0.2	0.1	10	6	3	1
Add for Non-Motorized Use	4.4	2.5	0.6	1.3	11	6	1	4
Add for Public Use	1.0	0.8	0.2	0	6	3	3	0
Decommission	70.6	51.2	13.0	6.3	216	146	38	32
<b>Grand Total</b>	<b>77.7</b>	<b>55.9</b>	<b>14.0</b>	<b>7.7</b>	<b>243</b>	<b>161</b>	<b>45</b>	<b>37</b>

Two National Forest System Roads would be decommissioned under Alternative 2 and are included in Tables 1 and 2:

- 1) An impassable, administrative, 2-mile-long segment of 17S08, South Boundary Road, is severely eroding. A passable road through private lands connects to both of its ends, and so it is not needed.
- 2) A steep, 1.6-mile-long segment of 16S03, Carveacre Road, is currently passable only by high-clearance, 4-wheel-drive vehicles. It is severely eroding and impacting sensitive biological resource areas, and its use presents unacceptable fire hazards and safety risks. Its decommissioning would also render an additional 2.6 miles of 16S03 inaccessible to motorized use by the public. Administrative use of this additional length would continue, given its gated connections to other roads at both ends.

The Cleveland National Forest prepared a draft Travel Analysis Report in September 2015 that found South Boundary Road to be “likely needed” prior to field survey of its condition and the steep segment of Carveacre Road to be “likely not needed.” Following up on the report, this EA and its associated public process meet the requirements of the Travel Management Rule (36 CFR 212) for revision of designations of National Forest System Roads and Trails, including the criteria for designations as analyzed in this EA.

### **Definitions**

Definitions are provided for the following terms that are referenced in Table 2 and Chapter 3:

Brushing for cover involves spreading of cut and/or chipped material/slash on the route to increase ground cover and/or disguise the route from being visible. It does not involve ground disturbance.

Outsloping of the trail surface is reconfiguring the trail surface to slope out so runoff drains across and off the trail surface versus being concentrated on the trail surface.

Stormproofing the trail surface involves constructing drainage control features that improve the trails resistance to damage during large storms. This mainly involves improving surface drainage. Activities may include construction of drainage control structures, such as waterbars; leadout ditches; armored spillways, ditches, and low water crossings; upgrading culvert sizes; outsloping; and placement of boulders, check dams, and over-side drains; armoring trail surface, etc.

Tilling and ripping of the trail surface is mixing and shattering of the trail soils to break up compaction and concentration of flow. When utilizing this method, operators should avoid creating slots parallel to the slope that may concentrate runoff. Ripping and tilling should be completed on contour or drained off site to avoid concentration of flow.

Chunking of the trail surface is breaking up and movement of the trail surface into 1 to 1½-foot mounds (or higher) set at odd intervals. The purpose of chunking is to break up compaction and flow paths down the trail surface.

Scarification of the trail surface includes any activity that disturbs the trail surface and disrupts drainage patterns. This can include chunking, ripping and tilling the trail surface/soils. The intent is to break up compaction and concentration of flow.

Hand earthwork involves ground disturbing work to be completed through hand crews and hand held equipment, with potentially minor use of wheelbarrows and ATVs to transport material. Hand earthwork may include construction of drainage control structures, such as waterbars; leadout ditches;

---

armored spillways, ditches, and low water crossings; and placement of boulders, check dams, and over-side drains; etc. Actions may also include raking, removal of berms, stabilization of gullies, placement of erosion control (wattles, silt fencing, straw bales, erosion control matting, mulching, slash, sandbags, etc.), seeding with native seed, and/or spreading of cut and/or chipped material/slash on the route to increase ground cover and/or disguise the route from being visible.

Earthwork involves ground disturbing work to be completed with mechanical equipment such as excavators, bulldozers, or similar equipment. Earthwork may include actions described in hand earthwork. Activities include construction of drainage control structures, such as waterbars; leadout ditches; armored spillways, ditches, and low water crossings; outsloping; and placement of boulders, check dams, and over-side drains. Actions may also include recontouring cut and fill slopes, eroded and/or disturbed areas; removing outside berms and culverts; filling in of ditches and gullies; ripping the route surface; and/or chunking the route surface. Decommissioned routes will have erosion control and debris (slash, boulders, organic matter, or erosion control materials) added to provide cover and block access. Erosion control methods may include placement of wattles, silt fencing, straw bales, erosion control matting, mulching, slash, and/or sandbags; seeding with native seed; and/or spreading of cut and/or chipped material/slash on the route to increase ground cover and/or disguise the route from being visible. Some routes being added to the system may require (in addition to stormproofing) surface armoring, such as chip sealing, aggregate, and/or paving.

Extensive Earthwork and Restoration includes actions described in earthwork but may also include extending the area of impact outside the road prism up to 20 feet from the road prism edge. These sites require more intensive efforts to restore hydrologic function and soil productivity. More intensive efforts may include recontouring of the hillside, filling in of throughcuts and gullies with imported/transported fill, grade stabilization in diverted streams or at stream crossings, re-establishment/stabilization of channels, removal of large amounts of fill, and additional erosion control.

### **Design Features**

Design features have been incorporated into the project to mitigate or reduce adverse impacts and achieve desired outcomes. These measures were guided by Cleveland LMP direction, project-specific objectives, and concerns identified by the Forest Service and the public during scoping:

- Should any previously unrecorded cultural resources be encountered during implementation of this project, all work would immediately cease in that area and the Forest Heritage Program Manager (HPM) would be notified immediately. Work could resume after approval by the HPM, provided any recommended Standard Protection Measures were implemented. Should any cultural resources become damaged in unanticipated ways by activities proposed in this project, the steps described in the Regional Programmatic Agreement for inadvertent effects would be followed.
- Should the project boundaries or activities be expanded beyond the current area of potential effect, such as for routes requiring “extensive restoration and earthwork,” National Historic Preservation Act Section 106 compliance for this project would be incomplete until additional cultural resource review was completed. The HPM would be kept informed of the status of various stages of the project, so that subsequent field work could proceed in a timely fashion.
- Prior to decommissioning unauthorized routes, high priority invasive weeds would be identified and removed in order to prevent their spread. Ground disturbing equipment would

---

be thoroughly cleaned of debris before performing earthwork, and weed-seed-free materials (such as straw wattles/bales, matting, mulch, slash, chips, and imported/transported fill) would be used to prevent the introduction of new invasive weeds into the project area. Vegetative restoration would be monitored annually for at least three years along routes where invasive species were identified before decommissioning.

- Barrier installation would involve minimal clearing around each footing.
- Decommissioning activities at three sites in Hauser Canyon would not occur during the breeding season (March 1 to August 1); or Least Bell's Vireo surveys would be conducted to determine if this species is present within or immediately adjacent to the project area between March 1 and July 1.
- Thirty-two routes in Arroyo Toad habitat would be surveyed prior to and monitored during decommissioning activities.
- Routes where Jacumba Milkvetch, Ramona Horkelia, Heart-leafed Pitcher Sage, Felt-leaved Monardella, San Felipe Monardella, Moreno Currant, and Gander's Butterwort may occur would be surveyed prior to decommissioning activities.
- Routes where Spiny Redberry may be present (Route 16S03 Carveacre) would be surveyed prior to decommissioning activities. All Spiny Redberry plants would be flagged and avoided during decommissioning activities.
- Limit maximum speed on unpaved roads to 25 miles per hour to minimize fugitive dust.
- Organic matter at project restoration and decommissioning sites would be retained at the site and be redistributed across the disturbed area (FSH 2509.18).
- Soil cover (on disturbed areas) following decommissioning and restoration activities would be maintained at levels of at least 50 percent of the soil surface in upland area and at least 71 percent in the Riparian Conservation Areas (RCA) (98 feet for intermittent streams and 50 feet for ephemeral streams). Soil cover would consist of rocks, litter, organic matter, low-growing plants, and woody debris. (FSH 2905.18)
- Mechanical equipment use would require ground conditions dry enough to prevent soil compaction, rutting, runoff of sediments to streams, or disturbance (in excess of disturbance needed to restore site). (FSH 2509.18, BMP 2.3, AqEco-2).
- Mechanical equipment refueling would occur outside of the RCA and would have spill containment measures in place during operations. For small quantities (5 gallons or less), fueling of gas-powered machinery would not occur within 25 feet of any body of water or stream channel to maintain water quality. (Road-10, BMP-2.11).
- Staging of equipment would occur outside the RCA (AqEco-2).
- Riparian vegetation would be protected during operations where possible (AqEco-2).
- Decommissioned and restoration sites would be stabilized, restored, and revegetated to a more natural state as necessary to protect and enhance National Forest System (NFS) lands, resources, and water quality (BMP 2.7).
- Sites added to the system would be stormproofed and added to the regular schedule of maintenance. (BMP 2.3, BMP 2.4).
- Sites would have erosion control plans for short and long-term recovery (BMP-2.13).
- Stream crossings would be adequately sized and stabilized (BMP 2.8).
- All other relevant Forest Service best management practices would also be used.

**Table 2.** Proposed Action by route, listed by District from south to north and alphabetically by map location (Appendix B) within each District. Route numbers appear on the maps.

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
<b>Descanso Ranger District</b>				
Anderson/Capitan Grande Reservation	SUA114	0.3	Decommission	63' of barrier needed at rocks just S of RCA; 21' at Reservation boundary; extensive earthwork and restoration throughout
Anderson/Capitan Grande Reservation	SUA114-0.26L-1	0.3	Decommission	21' barrier; earthwork throughout
Anderson/Capitan Grande Reservation	UND313	0.2	Decommission	21' barrier at boundary; extensive earthwork and restoration throughout; pull ineffective barrier further W and reinstall at boundary
Anderson/Capitan Grande Reservation	UND314	1.0	Decommission	21' barrier at SW boundary; extensive earthwork and restoration throughout; 4 vehicles off the road at property boundary (on NFS) need removal
Anderson/Capitan Grande Reservation	UND314-0.44L-1	0.3	Decommission	technical mountain bike trail needs extensive earthwork and restoration throughout
Anderson/Capitan Grande Reservation	UND324	0.4	Decommission	42' barrier at rock outcrop closest to boundary; extensive earthwork and restoration throughout
Anderson/Capitan Grande Reservation	UND8020	0.1	Decommission	previously decommissioned but needs 42' barrier extension and earthwork throughout
Anderson/Capitan Grande Reservation	UND8023	0.2	Decommission	only half of loop on NFS; 21' barrier (E) and 42' (W) at boundary and earthwork throughout
Anderson/Capitan Grande Reservation	UND8294	0.1	Decommission	extensive earthwork and restoration throughout
Anderson/Capitan Grande Reservation	UND8296	0.1	Decommission	extensive earthwork and restoration throughout
Bear Valley	16S12-3.70L-1	0.7	Add for Public Use	Add to System as Motorized Trail; needs stormproofing

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Bear Valley	16S12-1	0.5	Decommission	dirt bikes are being lifted over existing barrier; backup fence needs mending or barrier needs to be raised
Bear Valley	16S12-1.25L-1	0.1	Decommission	dirt bike trail needs 21' of barrier; hand earthwork
Bear Valley	16S12-1.59R-1	0.1	Decommission	105' barrier needs to be added to existing barrier; hand earthwork
Bear Valley	DRD500001-1	0.1	Decommission	21' barrier needs to be added to existing barrier; earthwork throughout
Bear Valley	SUA-133	0.2	Decommission	2 x 21' barrier and earthwork throughout
Bear Valley	SUA-POO-1	0.3	Decommission	extensive earthwork and restoration throughout
Bear Valley	SUA-POO-2	0.3	Decommission	extensive earthwork and restoration throughout
Bear Valley	UND447	0.4	Decommission	105' barrier; earthwork throughout
Bear Valley	UND450	0.1	Decommission	21' barrier on each end; earthwork throughout
Boulder Creek Road South	15S26-0.47R1	0.2	Decommission	hill climb needs earthwork
Boulder Creek Road South	UND125	0.1	Decommission	earthwork throughout; already protected by gate
Boulder Creek Road South	UND375	0.0	Decommission	earthwork needed; already protected by gate
Boulder Creek Road South	UND8026	0.2	Decommission	replace gate with 21' of barrier; extensive earthwork and restoration throughout
Buckman Springs	16S12-5.85R-1	0.1	Decommission	existing fence breached by dirt bikes; needs mending or 63' of barrier
Buckman Springs	16S12-6.014L-2	0.8	Decommission	330' barrier from large redshank in N to upright boulders in S, with gate for helipad; 21' x 2 to fortify existing barrier in N; extensive earthwork and restoration throughout; 450' of barrier and hand earthwork on far side of road
Buckman Springs	UND842	0.4	Decommission	extensive earthwork and restoration throughout; mining at end; no claim posted

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Buckman Springs	UND9070	0.4	Decommission	21' barrier at crest of first hill; earthwork up to far side of stream (not on loop past)
Buckman Springs	UND9073	0.3	Decommission	660' barrier; earthwork throughout
Buckman Springs	UND9075	0.1	Decommission	E half naturally decommissioned; W needs earthwork
Buckman Springs	UND9076	0.0	Decommission	earthwork throughout
Buckman Springs	UND9077	1.0	Decommission	2 x 21' barrier at spot closest to road; 42' at N-most entry; earthwork throughout (except in mapped arch site), unless keeping
Buckman Springs	UND9084	0.0	Decommission	42' barrier; earthwork throughout
Buckman Springs/Long Valley	16S12-6.68L-1	0.0	Decommission	dirt bike gate go-round; barrier needs 21' extension
Carveacre	16S03	1.6	Decommission	earthwork throughout steep portion that connects to Lyons Valley Road
Corte Madera	16S17-0.84R-1	0.0	Decommission	dirt bikes getting around gate; 21' barrier needed on each side (or 3-4 boulders)
Corte Madera	SUA22	0.2	Decommission	overgrown 2-track; occasional use by horse, truck, and Border Patrol; inform landowners and install signage at each end
Corte Madera	UND847	0.4	Decommission	overgrown 2-track; occasional use by horse, truck, and Border Patrol; inform landowners and install signage at each end
El Cajon Mountain	13S10-16.8R1	0.2	Add for Administrative Use	Add to System as actual segment of the Westside Truck Trail, not an unauthorized route, and stormproof
El Cajon Mountain	13S10	0.2	Decommission	earthwork throughout; signage needed to keep admin vehicles on actual road
El Cajon Mountain	13S10-15.72L1	1.1	Decommission	earthwork only on steep segment

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
El Cajon Mountain	13S10-15.77L1	0.3	Decommission	overgrown, will naturally revegetate
El Cajon Mountain	13S10-15.93L1	0.3	Decommission	earthwork throughout
El Cajon Mountain	13S10-16.8R2	0.4	Decommission	old road around large stock pond; earthwork throughout; extensive earthwork and restoration in places
El Cajon Mountain	13S10-17.03L1	0.2	Decommission	earthwork throughout
El Cajon Mountain	13S10-17.03L2	0.5	Decommission	earthwork throughout
El Cajon Mountain	13S10-17.15L1	0.1	Decommission	earthwork throughout
El Cajon Mountain	UND138	0.2	Decommission	earthwork throughout
El Cajon Mountain	UND782	0.1	Decommission	will naturally revegetate
El Cajon Mountain	UND783	0.5	Decommission	will naturally revegetate
El Cajon Mountain	UND784	1.2	Decommission	earthwork throughout
El Cajon Mountain	UND785	0.3	Decommission	extensive earthwork and restoration in places
El Cajon Mountain	UND8135	0.2	Decommission	will naturally revegetate
El Cajon Mountain	UND8137	0.3	Decommission	earthwork throughout
El Cajon Mountain	UND8137-0.02L1	0.4	Decommission	earthwork throughout
El Cajon Mountain	UND8137-0.1L1	0.1	Decommission	will naturally revegetate
El Cajon Mountain	UND8139	0.9	Decommission	earthwork throughout
El Cajon Mountain	UND8139-0.15R1	0.2	Decommission	earthwork throughout

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Hauser Wilderness	17S08	2.0	Decommission	shown as System road (S. Boundary) - remove from System; 441' of barrier at S end, including gate on SDG&E pole access, plus 21' at a rock gap; 63' on N end, 60 yards from end; extensive earthwork and restoration throughout
Hauser Wilderness	17S08-3.96L-1	0.1	Decommission	5 imported boulders at entrance; no earthwork
Hauser Wilderness	17S12	2.0	Decommission	63' barrier on E end; 210' on W; extensive earthwork and restoration throughout, including two stream crossings
Hauser Wilderness	17S12	1.5	Decommission	210' barrier on W end, just above swale just W of main drainage; 42' on E end at existing gate; extensive earthwork and restoration throughout
Hauser Wilderness	17S12-5.92L-1	0.5	Decommission	105' barrier at W end; 21' at E end
Hauser Wilderness	17S12-Spur	0.1	Decommission	earthwork throughout
Hauser Wilderness	UND371	0.2	Decommission	leads to old earthen dam, abandoned well, and trough; metal debris halfway down; earthwork throughout
Hauser Wilderness	UND566	0.7	Decommission	126' barrier at top end (S); extensive earthwork and restoration throughout
Hauser Wilderness	UND568	0.3	Decommission	126' barrier at warning sign; brush for cover
Hauser Wilderness	UND569	0.5	Decommission	5 imported boulders at S end; 42' barrier at N; earthwork for all but southernmost 200 yards
Hauser Wilderness	UND8102	0.8	Decommission	swing gate needs to be replaced by barrier; hand earthwork
Hauser Wilderness	UND865	1.1	Decommission	swing gate needs to be replaced with barrier; earthwork throughout
Hauser Wilderness	UND865-1.06L-1	0.1	Decommission	earthwork throughout

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Japatul Valley Road	15S28	1.6	Decommission	intermittent earthwork needed throughout; extensive restoration of some sites
Kitchen Creek Central/Sheephead	15S18-Spur 1	0.1	Decommission	remove barrier; extensive earthwork and restoration throughout; replace barrier
Kitchen Creek Central/Sheephead	15S18-Spur 2	0.0	Decommission	294' barrier from end of hang gliding launch pad to existing barrier
Kitchen Creek Central/Sheephead	UND173 - SDC KCR Connector	1.1	Decommission	cattle trail to private lands; 147' of barrier needed, including cattle gate or bollards; earthwork 250 yards to the stream plus the loop adjacent to Kitchen Creek Road
Kitchen Creek Central/Sheephead	UND8426	0.1	Decommission	extensive earthwork and restoration throughout
Kitchen Creek Central/Sheephead	UND8436	0.2	Decommission	extensive earthwork and restoration throughout
Kitchen Creek North/Wooded Hill	15S09-2.46L	0.2	Add for Administrative Use	Add to System for pumphouse access; already behind locked gate; needs stormproofing
Kitchen Creek North/Wooded Hill	15S09-2.46L	0.3	Add for Non-Motorized Use	Add to System as non-motorized trail; stormproof with hand crew and stabilize stream crossing
Kitchen Creek North/Wooded Hill	15S10A Spur	0.3	Add for Non-Motorized Use	Add to System as non-motorized trail; turns into singletrack at first drainage and connects to 15S09-2.46L; replace gate at back of group campground with 8 bollards; earthwork to narrow to first drainage plus stormproofing
Kitchen Creek North/Wooded Hill	15S17-1.44L-1	0.1	Add for Public Use	Add to System as dispersed camping spur; earthwork throughout to stormproof; 188' of barrier to delineate campsite
Kitchen Creek North/Wooded Hill & Pine Creek	UND162	0.1	Add for Administrative Use	Add to System as primary driveway for Kemp ranch house

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Kitchen Creek South	UND9531	0.7	Add for Non-Motorized Use	add to System as non-motorized trail; 2,373' barrier with horse gate; earthwork throughout
Kitchen Creek South	15S17A-0.11R1	1.1	Decommission	21' barrier just past private land entrance in N; extend helibase fence to meet barbed wire further S; earthwork throughout
Kitchen Creek South	CAMERON TK TR-1.74R-1	0.0	Decommission	42' of barrier and earthwork throughout
Kitchen Creek South	CAMERON TK TR-2.34R-1	0.1	Decommission	315' barrier along road; earthwork throughout; signage needed on road: "stay on road"
Kitchen Creek South	Kitchen Creek 1	0.1	Decommission	needs wire fence for length of road (0.75 miles); earthwork throughout; 5 imported boulders on entrance
Kitchen Creek South	Kitchen Creek 2	0.1	Decommission	210' barrier along pullout; earthwork throughout; wire fence for entire distance between helipad and helibase (0.75 miles)
Kitchen Creek South	Kitchen Creek 3	0.2	Decommission	earthwork throughout; 5 imported boulders on entrance
Kitchen Creek South	UND379	0.1	Decommission	mend 45' gap in barbed wire; earthwork throughout; boulders on entrance
Kitchen Creek South	UND525	0.0	Decommission	105' barrier and earthwork throughout
Kitchen Creek South	UND527	0.0	Decommission	earthwork throughout
Kitchen Creek South	UND8323	0.5	Decommission	21' barrier just past apiary; extensive earthwork and restoration throughout
Kitchen Creek South	UND9065	0.2	Decommission	earthwork throughout; 5 imported boulders on entrance
Lake Morena	UND9549	0.4	Add for Non-Motorized Use	add to System as non-motorized trail; 336' barrier with horse gate at entrance to delineate trailhead; 4,200' of wire fence along road; intermittent earthwork
Lake Morena	17S02A-0.27R-1	0.4	Decommission	4 boulders at N end, close enough together to block dirt bikes; hand earthwork throughout

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Lake Morena	17S07-3.23R-1	0.0	Decommission	84' barrier on E side; 42' on W side; brush for cover
Lake Morena	17S08-0.45R-1	0.0	Decommission	21' barrier in S; earthwork throughout
Lake Morena	UND330	0.3	Decommission	21' barrier 100 yards above boundary; extensive earthwork and restoration in places
Lake Morena	UND333	0.1	Decommission	42' barrier at boundary; extensive earthwork and restoration in places
Lake Morena	UND335	1.3	Decommission	21' of barrier in N at boundary; extensive earthwork and restoration in places
Lake Morena	UND335-0.25R-1	0.0	Decommission	21' barrier at E end
Lake Morena	UND335-0.31R-1	0.0	Decommission	21' barrier at E end
Lake Morena	UND340	0.5	Decommission	place 4 boulders at W end (behind locked gate); raise horse gate on E end; extensive earthwork and restoration in places
Lake Morena	UND342	0.8	Decommission	extensive earthwork and restoration in places
Lake Morena	UND370	0.1	Decommission	63' barrier in S, 84' in N; place boulders to stabilize dam spillway; earthwork throughout
Lake Morena	UND382	1.3	Decommission	raise horse gate on S entry; extensive earthwork and restoration in places
Lake Morena	UND553	0.7	Decommission	motorized use of Pacific Crest Trail; earthwork throughout; extensive earthwork and restoration in places
Lake Morena	UND555	0.1	Decommission	21' barrier at boundary; earthwork throughout
Lake Morena	UND560	0.0	Decommission	earthwork throughout
Lake Morena	UND565	0.1	Decommission	earthwork throughout
Lake Morena	UND572	0.9	Decommission	extensive earthwork and restoration throughout

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Lake Morena	UND601	0.3	Decommission	63' barrier on each end on the property line; extensive earthwork and restoration throughout
Lake Morena	UND602	0.3	Decommission	21' barrier at W end; 147' in E, at first defensible location on NFS (manzanita to manzanita); earthwork throughout; DRD101109-1 is inaccurately mapped - see notes
Lake Morena	UND9090	0.0	Decommission	earthwork throughout
Lake Morena	UND9091	0.0	Decommission	714' barrier behind turnaround; earthwork throughout
Lake Morena	UND9549-0.20R-1	0.4	Decommission	earthwork throughout on main trail
Long Valley	UND502	0.1	Add for Administrative Use	Add to System for helispot access; stormproof; fix pavement where OHVs are driving onto it, decommission one entry (21' barrier and earthwork) and gate the other
Long Valley	16S15-0.98R-1	0.0	Decommission	barrier listed for UND9095 is sufficient for this one too; earthwork throughout
Long Valley	16S15-1.15R-1	0.4	Decommission	dirt bikes only; 162' barrier on W end; hand earthwork throughout
Long Valley	16S15-1.24R-1	0.0	Decommission	231' barrier and earthwork throughout
Long Valley	16S15-1.38R-1	0.0	Decommission	63' barrier
Long Valley	16S15-1.53R-1	0.1	Decommission	dirt bikes only; 21' barrier at each end
Long Valley	16S15-1.65L-1	0.2	Decommission	dirt bikes only; 126' barrier at E end
Long Valley	16S15-1.78R-1	0.0	Decommission	leads to Bear Valley; extend existing barrier on both sides of Long Valley Loop Road by 168' (N) and 105' (S); stabilize stream crossing

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Long Valley	16S15-1.97R-1	0.0	Decommission	leads to Corte Madera Ranch; needs 100 yards extension of barbed wire; carsonite sign on road; recommend private property sign on gate (in addition to existing no trespassing signage)
Long Valley	16S15-3.79R-1	0.2	Decommission	dirt bikes riding stream channel and RCA; 861' barrier needed; earthwork throughout
Long Valley	16S15-4.18R-1	0.0	Decommission	21' barrier at N, 42' next S, 42' at S; earthwork throughout
Long Valley	16S15-6.10R-1	0.1	Decommission	dirt bikes only; 273' barrier; hand earthwork throughout
Long Valley	16S16-0.04R-1	0.4	Decommission	none; to be addressed by other recommendations
Long Valley	SUA171	0.1	Decommission	63' of barrier; earthwork throughout
Long Valley	SUA171	0.0	Decommission	21' barrier
Long Valley	SUA172	0.1	Decommission	barrier noted for additional route will close this one too; no earthwork required
Long Valley	UND486	0.0	Decommission	dirt bikes only; 63' barrier; hand earthwork
Long Valley	UND488	0.0	Decommission	hand earthwork
Long Valley	UND490	0.1	Decommission	hand earthwork
Long Valley	UND490-0.06R-1	0.0	Decommission	hand earthwork
Long Valley	UND492	0.1	Decommission	hand earthwork
Long Valley	UND500	0.5	Decommission	dirt bikes riding stream channel; 126' barrier at S origin; 84' (E) and 21' (W) at road crossing; 2 x 21' at N end; earthwork throughout
Long Valley	UND504	0.0	Decommission	will naturally revegetate
Long Valley	UND507	0.2	Decommission	will naturally revegetate

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Long Valley	UND509	1.0	Decommission	100' barrier on NW end; 60' on SE end; earthwork throughout
Long Valley	UND9095	0.1	Decommission	84' (extending the Legacy 147') on the upstream side (N); 63' on the downstream side (S); 126' further S; earthwork outside of channel
Long Valley	UND9096	0.2	Decommission	105' barrier; brush for cover
Long Valley	UND-Trail130	0.4	Decommission	leads to RCA; 21' of barrier
Long Valley	UND-Trail57	0.2	Decommission	will naturally revegetate
Mount Laguna	15S20B	0.8	Add for Administrative Use	Add to System for admin water tank access; stormproof; gate wide open, should be closed; add horse gate
Mount Laguna	UND389	0.3	Add for Non-Motorized Use	Add to System as non-motorized trail; needs stormproofing by hand earthwork
Mount Laguna	UND-Trail17	0.4	Add for Non-Motorized Use	Add to System as non-motorized trail; replace gate with barbed wire on S end
Pine Creek	14S05-7.6R1	0.1	Add for Administrative Use	Add to System for access to pumphouse and troughs; needs gate
Pine Creek	14S05-6.61L-1	0.0	Add for Public Use	Add to System as dispersed camping spur
Pine Creek	14S05-6.25R1	0.1	Decommission	399' barrier; earthwork to stream crossing; 362' on SE side of road; 462' on NW; 378' x 2 further down road
Pine Creek	14S05D-Extension	1.0	Decommission	barrier already in place; extensive earthwork and restoration needed throughout
Pine Creek	Pine Creek 1	0.0	Decommission	42' barrier (or 2 hazard trees) to close spur that approaches stream; leave and stormproof loop pullout
Pine Creek	Pine Creek 2	0.1	Decommission	399' barrier; earthwork throughout
Pine Creek	Pine Creek 3	0.1	Decommission	252' + 21' barrier along Pine Creek Road; earthwork throughout

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Pine Creek	Pine Creek 4	0.0	Decommission	earthwork throughout
Pine Creek	UND8114	0.2	Decommission	21' barrier needed at each end; earthwork throughout
Pine Creek	UND872	0.9	Decommission	effective barrier in place; extensive earthwork and restoration throughout
Pine Creek	UND985	0.2	Decommission	place 21' barrier to leave a single campsite near the road; earthwork to end
Pine Creek	UND985	0.1	Decommission	315' barrier along Miner's Road; extensive earthwork and restoration throughout
Tule Springs	UND-Trail81	2.6	Decommission	21' barrier; earthwork only for first 600 yards
<b>Palomar Ranger District</b>				
Boulder Creek Road	UND102	0.1	Add for Public Use	Add to System as viewpoint; existing barrier needs 147' extension on uphill side to road
Boulder Creek Road	UND114-2	0.2	Decommission	21' barrier to prevent vehicle access to RCA; earthwork throughout
Boulder Creek Road	13S08-10.95R-1	0.1	Decommission	21' barrier just before borrow site; earthwork throughout
Boulder Creek Road	13S08-8.83R-1	0.1	Decommission	231' barrier, including gate; earthwork throughout staging area and start of permitted route to apiary
Boulder Creek Road	Boulder Creek 1	0.0	Decommission	place 14 boulders to block access
Cedar Creek	13S06-11.6L1	0.5	Decommission	168' barrier; earthwork to where it reenters the RCA
Cedar Creek	13S06-5.2R1	0.3	Decommission	previously closed; reinforce existing barrier using on-site boulders
Cedar Creek	River Gorge 1	0.3	Decommission	357' barrier from stream channel to boundary, set back from road; earthwork throughout
Cedar Creek	UND191	0.5	Decommission	earthwork to RCA; hand earthwork for remainder

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
High Point	High Point 1	0.3	Decommission	42' barrier midslope; earthwork only on initial steep climb
Inaja/Upper San Diego River	UND384	3.2	Decommission	gate at boundary should be replaced with 21' of barrier; previously and then naturally decommissioned beyond confluence; earthwork down to confluence turnaround plus hand work beyond to mainstem crossing
Inaja/Upper San Diego River	UND384-SPUR2	0.1	Decommission	earthwork throughout; 600' wire fence
Inaja/Upper San Diego River	UND384-SPUR3	0.0	Decommission	earthwork throughout; 250' wire fence
Indian Flats	PCT-SPUR-PRD	0.7	Add for Non-Motorized Use	Add as Non-Motorized Trail; connects PCT to BLM land; accesses spring from PCT; heavily used by horses; stormproofing throughout
Indian Flats	UND148	0.0	Add for Public Use	Add to System as actual road rather than the steep section; SE intersection needs to be widened by 10'; armor road surface
Indian Flats	9S05-4.70L-1	0.1	Decommission	42' barrier; earthwork throughout
Indian Flats	9S05-5.25R-1	0.1	Decommission	42' barrier set back from road; earthwork throughout
Indian Flats	9S05-6.98R1	0.0	Decommission	63' barrier; stabilize stream crossing; brush entrance
Indian Flats	9S05A	0.0	Decommission	21' barrier at top (E) and 42' at bottom (W); extensive earthwork and restoration throughout
Indian Flats	UND149	0.1	Decommission	21' barrier at base of road prism; extensive earthwork and restoration throughout; old water tank (6' diameter, 6' long) should be removed
Indian Flats	UND268	0.5	Decommission	earthwork throughout
Indian Flats	UND51	1.1	Decommission	21' barrier at boundary (top of throughcut); earthwork throughout
Indian Flats	UND55	0.0	Decommission	21' barrier at midpoint; earthwork throughout

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Indian Flats	UND856	0.1	Decommission	earthwork throughout
Pamo Valley	UND105	0.2	Add for Administrative Use	Add to System for water tank access; needs barrier measurement and gate; not needed beyond intersection with UND115
Pamo Valley	UND106	0.0	Add for Administrative Use	Add to System for water tank access
Pamo Valley	UND115	0.0	Add for Administrative Use	Add to System for water tank access
Pamo Valley	12S07-1.27R-1	0.1	Add for Public Use	Add to System as viewpoint access; needs stormproofing and realignment
Pamo Valley	UND887	0.0	Decommission	315' barrier; remove old concrete crossing; earthwork throughout
Pamo Valley	UND9003	0.1	Decommission	126' barrier; earthwork throughout
Pamo Valley	UND94	0.1	Decommission	place 5 boulders (available on-site) to prevent renewed vehicle incursions; be sure to leave room for an engine to turn around; pull 6 posts and barbed wire
Tule Springs	14S07-6.35L1	0.3	Decommission	63' barrier
Tule Springs	14S07-6.79R-1	0.4	Decommission	42' barrier; earthwork throughout
Tule Springs	UND720A	0.8	Decommission	only SE-most 300 yards needs extensive earthwork and restoration; Tule Springs Road needs gate with 84' of barrier on each side at Pine Grove; trough in Recommended Wilderness needs removal
Tule Springs	UND720B	0.8	Decommission	420' barrier
Tule Springs	UND735	0.1	Decommission	will naturally revegetate
Tule Springs	UND736	0.5	Decommission	will naturally revegetate

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Tule Springs	UND740	0.4	Decommission	ends at stream crossing; 21' of barrier; 20' x 40' foundation and massive abandoned well need removal
Tule Springs	UND741	0.1	Decommission	will naturally revegetate
Tule Springs	UND742	0.6	Decommission	E end in use to stream crossing, will naturally revegetate; naturally decommissioned to the next stream crossing; W end needs 21' barrier and hand earthwork to 2nd stream crossing
Tule Springs	UND744	0.1	Decommission	will naturally revegetate
Tule Springs	UND745	0.5	Decommission	42' barrier; earthwork throughout
Tule Springs	UND747	0.2	Decommission	first half will naturally revegetate; second half is already naturally decommissioned
Will Valley	UND386	0.5	Decommission	replace gate with 42' barrier at boundary; earthwork throughout
Will Valley	UND386-0.67L-1	0.1	Decommission	earthwork throughout; fence boundary with Will Valley; place 7 bollards on W end
<b>Trabuco Ranger District</b>				
Bedford	BD-2	0.1	Decommission	21' barrier at bottom; earthwork throughout
Bedford	BD-4	0.2	Decommission	63' barrier at top, 21' in middle, 42' at bottom; earthwork throughout
Bedford	BD-5	0.1	Decommission	63' barrier at top, 84' at bottom; earthwork throughout
Bedford	BD-7	0.2	Decommission	294' barrier, including gate; stormproofing needed; permitted route to apiary
Bedford	UND-Trail301	0.2	Decommission	42' barrier at top, 21' at bottom; earthwork throughout
Bedford	UND-Trail302	0.6	Decommission	63' barrier at top; 105' at bottom + 21' at top of guzzler; earthwork throughout
Elsinore Peak	7S04-Spur	0.0	Decommission	needs gate at bottom of Hixon Truck Trail

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Fox Spring/Lucas Canyon	UND418	0.5	Add for Non-Motorized Use	Add to System as non-motorized trail; needs stormproofing and minor realignment
Long Canyon/Ortega Highway	UND8405	0.3	Decommission	240' barrier (preferably wood); earthwork throughout
Long Canyon/Ortega Highway	UND8406	0.3	Decommission	barriered by UND8405; earthwork throughout
Long Canyon/Ortega Highway	UND8408	0.3	Decommission	barriered by UND8405
Margarita Peak	UND9120	0.4	Add for Non-Motorized Use	21' barrier and horse gate; earthwork throughout, retain and stormproof a non-motorized System trail
Margarita Peak	8S01-3.54L-1	0.0	Decommission	gate go-round needs 21' barrier; brush for cover
Margarita Peak	8S01-5.95R-1	1.1	Decommission	dirt bike trail along Wilderness boundary; 21' barrier
North Main Divide	UND8706	0.1	Add for Administrative Use	Add to System for helipad and water tank access; needs gate and 63' of barrier on each side
North Main Divide	3S04-10.05R-1	0.2	Decommission	63' barrier at each end; earthwork throughout
North Main Divide	3S04-5.26L-1	0.0	Decommission	gate go-round needs 42' barrier at bottom (SW) and a carsonite sign at top
North Main Divide	3S04-5.86L-1	0.2	Decommission	126' barrier; earthwork throughout
North Main Divide	SKYLINE-SPUR1	0.7	Decommission	21' barrier (SW) and 63' (NE); extensive earthwork and restoration throughout
North Main Divide	SKYLINE-SPUR2	0.2	Decommission	42' barrier; extensive earthwork and restoration throughout
North Main Divide	UND11	0.3	Decommission	old dozer line behind FS gate; earthwork throughout
North Main Divide	UND5	0.4	Decommission	no barrier needed (behind locked gate); hand earthwork needed down to first intersection

Map Location	Route Number	Length (miles)	Action Type	Proposed Action
Silverado Canyon	5S04-0.33L-1	0.1	Decommission	168' barrier on E side; 63' on W side and excavate tank trap further; no earthwork needed on route
Silverado Canyon	5S04-0.45R-1	0.0	Decommission	42' barrier on S side of existing gate; 2 sections perpendicular to each other to prevent dirt bikes from getting around the gate
Silverado Canyon	5S04-5.25R-1	0.1	Decommission	63' barrier on downslope end; 21' in middle; 21' upslope; earthwork throughout
Trabuco Canyon	UND201	0.3	Add for Non-Motorized Use	Add to System as non-motorized trail; needs hand earthwork, cleared to top of first eroded section; connects to other non-System trails, leaves from marked County trails
Trabuco Canyon	6S13-2.86L-1	0.1	Decommission	first stream crossing: replace 7' barrier on N side; place 2 additional boulders on S side
Trabuco Canyon	6S13-3.08R-1	0.1	Decommission	105' barrier, behind 2 trees
Trabuco Canyon	6S13-3.66R-1	0.1	Decommission	second crossing: 5 boulders or dam pieces across stream channel; 42' of barrier just upstream along road
Trabuco Canyon	6S13-4.54R-1	0.0	Decommission	fourth stream crossing: 42' of barrier just upstream along road
Trabuco Canyon	6S13-5.56L-1	0.0	Decommission	trailhead at end of road: extend barrier by 21' to keep dirt bikes off trail; 84' barrier along base of slope, behind sycamore
Trabuco Canyon	TC Pvt Spur	0.0	Decommission	21' barrier including gate; private landowner permission granted to prevent unauthorized motorized access to the National Forest
Wildomar/South Main Divide	SUA28	0.1	Add for Non-Motorized Use	42' barrier with horse gate, place boulders at ends of barrier; earthwork throughout to narrow and stormproof; retaining a non-motorized System trail
Wildomar/South Main Divide	SUA28-SPUR	0.1	Decommission	foot/horse trail to RCA needs hand earthwork

<b>Map Location</b>	<b>Route Number</b>	<b>Length (miles)</b>	<b>Action Type</b>	<b>Proposed Action</b>
Wildomar/South Main Divide	UND8243	0.1	Decommission	horse trail; hand earthwork throughout
Wildomar/South Main Divide	UND8248	0.1	Decommission	horse trail; descent to creek needs hand earthwork
Wildomar/South Main Divide	UND8250	0.1	Decommission	horse trail; descent towards creek needs hand earthwork

## 2.3 - Comparison of Alternatives

This comparison of alternatives provides a summary of the effects of implementing each alternative. Information in the table is focused on instances where different levels of effects or outputs can be distinguished quantitatively or qualitatively among alternatives.

*Table 3. Comparison of Alternatives.*

	<b>Alternative 1 (No Action)</b>	<b>Alternative 2 (Proposed Action)</b>
<b>Soils and Water</b>	Soil erosion, water quality issues, and riparian habitat degradation would persist on unauthorized routes throughout the project area.	Soil erosion, water quality issues, and riparian habitat degradation would be reduced throughout the project area, through decommissioning of many routes and stormproofing and maintenance of those being added to the System.
<b>Air Quality</b>	Unauthorized routes in the project area would continue to generate low levels of both emissions and dust, which would not be expected to cause any significant local or regional air quality impacts.	Unauthorized route decommissioning and stormproofing in the project area would generate low levels of both emissions and dust, which would not be expected to cause any significant local or regional air quality impacts.
<b>Biological Resources</b>	The endangered, threatened, sensitive, and management indicator species would continue to be adversely affected by unauthorized routes, along with the spread of invasive weeds and increased fire risk associated with the routes.	The Proposed Action is expected to have no effect on threatened or endangered species and would not be likely to result in a trend toward federal listing or a loss of viability for sensitive animal species. The decommissioning of unauthorized routes would improve habitat conditions for threatened, endangered, sensitive, and management indicator species, and would result in the control of several high priority invasive weeds.
<b>Recreation and Public Safety</b>	Recreationists seeking intact areas would continue to be negatively affected by OHV use of unauthorized routes.	The Proposed Action would bring the National Forest into better alignment with the Land Management Plan, by providing a variety of OHV opportunities on designated trails, including a new trail, while addressing resource issues and use of unauthorized routes. One System Road, Carveacre, would no longer be available for public motorized use.
<b>Cultural Resources</b>	Damage would continue to occur to 30 known prehistoric and historic sites through ongoing OHV use.	Along with design features that address cultural resources (p. 7), this finding determines that there would be no direct, indirect, or cumulative effects to cultural resources under the Proposed Action.

---

## 3 - ENVIRONMENTAL CONSEQUENCES

This chapter provides an overview of the physical, biological, and social environments of the project area and the potential changes to those environments that would result from implementing each of the alternatives. Included in this analysis is an assessment of the cumulative effects of the alternatives on the physical, biological, and social environments. This chapter also presents the scientific and analytical basis for comparison of the two alternatives presented in chapter 2 of the EA.

### 3.0.1 – Scope of Cumulative Effects Analysis

This section describes the scope of cumulative effects used for analysis of the two alternatives for the physical, biological, and social environments. Cumulative impacts are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions. The cumulative effects are summarized within each resource section.

Because this project would occur across all three Ranger Districts, the Cleveland National Forest as a whole is the appropriate scope for cumulative effects analysis. The project would be implemented over the next five years, and so that is the appropriate temporal scope for the analysis.

Activities to be considered for cumulative effects analysis include:

- Continued operation and maintenance of existing roads, trails, trailheads, campgrounds, and other Forest Service facilities.
- Ongoing recreational activity across the National Forest.
- Special use authorizations including utilities and a variety of other uses.
- Recent wildfires, including the effects of the massive 2003 and 2007 fires.
- Fuels management projects in multiple areas.
- Ongoing invasive species management and aquatic organism passage projects.
- Development and activities on private inholdings and adjacent lands.

## 3.1 - Physical Environment

---

This section evaluates impacts of the two alternatives to soils, water, and air quality.

### 3.1.1 – Soils and Water

The watershed designations used by the Forest Service come from the National Hydrologic Database maintained by the United States Geologic Survey. The project lies within 30 different hydrologic unit code 12 (HUC) subwatersheds. The project area is a very small percentage of the overall subwatersheds' acreage.

In total, there are approximately 213 miles of perennial stream and 2,380 miles of seasonal stream (primarily intermittent and does not include all ephemeral channels) in the project subwatersheds. Along streams, lakes, wetlands, seeps, springs and other hydrologic features are riparian areas that are managed as riparian conservation areas (RCAs). RCAs are a key component in protecting fish, water quality, and wildlife habitat. The primary RCA management emphasis is on protecting and, where necessary, restoring the condition of riparian and aquatic habitats. Activities in RCAs have more restrictions as riparian areas tend to support more sensitive habitats. Widths of RCAs for various hydrologic features are listed in Table 4.

**Table 4. Riparian Conservation Areas.**

RCA type	Width of the Riparian Conservation Area
Perennial Streams	328 feet on each side of the stream, measured from the bank full edge of the stream.
Seasonally Flowing/Intermittent Streams	98 feet on each side of the stream, measured from the bank full edge of the stream.
Stream in Inner Gorge (Gorge slopes of 70% or more)	Top of inner gorge.
Lakes, ponds, wetlands, seeps, and springs	328 feet from edge of feature or riparian vegetation, whichever is greater.
Extended Riparian conditions: <ul style="list-style-type: none"> <li>• Perennial stream with riparian condition extending more than 164 feet from edge of streambank.</li> <li>• Seasonal stream with riparian conditions extending more than 33 feet from edge of streambank.</li> </ul>	328 feet from edge of feature or riparian vegetation, whichever is greater.
Other hydrological or topographic depressions without a defined channel (meadows, vernal pools)	RCA width and protection measures determined through project level analysis.

Elevation of the project area ranges between approximately 280 to 3,960 feet. Precipitation across the project area sites are dominated by rain, and generally accumulate between 15 to greater than 30 inches annually.

The two soil series that cover the majority of the project area are La Posta (~52 acres) and Cieneba (~40 acres). The rest of the soil series have less than 24 acres each. The majority of soils have developed from bedrock weathered in place (mostly igneous and some metamorphic) with lesser soils comprised of alluvium (transported material). Erosion hazard ratings for the two main soils series range from Moderate to Very High. For road building, all soils in the two series rate as Severe erosion hazard.

The California Regional Water Quality Control Boards (San Diego region, Santa Ana region, and Colorado River Basin region) designate the beneficial uses for all surface and ground waters through each region’s basin plan. These beneficial uses, of which recreational and ecosystem uses were the most common in the project area, were included in the analysis of effects and are documented in the project record.

Forest Roads and Unauthorized Routes

Roads are the number one anthropogenic contributor of sediment to streams and have been found to change both soil properties and hydrologic behavior; however, road segments vary as to the amount they impact watershed resources depending on amount of use, proximity to water, design, slope, and composition. Sediment production usually increases with an increase in traffic. Hydrologically connected roads expand the drainage network, increasing peak flows, bank instability, and sediment delivery. For roads within the RCA, close proximity to water increases the likelihood of hydroconnectivity.

Roads can be designed to minimize impacts through stormproofing, implementation of Best Management Practices (BMPs), aggregate surfacing, relocation, and decommissioning. The objectives of stormproofing roads are to improve drainage of roads to handle runoff from large storms (50 to 100 year-sized storms) and minimize road related damage to the hydrologic system. This helps

minimize maintenance and increases the life of roads. Aggregate surfacing and revegetation of bare soil, road ditches, and road prisms reduce the amount of sediment produced by roads and ditches by trapping sediment and stabilizing slopes. Surfacing roads has been found to reduce road related sediment production by more than an order of magnitude (Coe, 2006). Relocation and decommissioning of routes is a long-term management action to reduce road impacts and is sometimes necessary. Decommissioning can result in a short-term impact, such as an increase in sediment production; however, there is a long-term benefit after the formerly roaded area has recovered and regained vegetative cover.

### Best Management Practices

BMPs are an agreement between the U.S. Forest Service and the State and Regional Water Boards to control nonpoint source discharges by implementing control actions certified by the State Water Board. The Regional Water Board enforces compliance with BMP implementation to ensure that water quality is protected. The objectives of BMPs are to meet road needs for users while minimizing disturbance and protecting water quality, aquatic organisms, riparian areas, and downstream beneficial uses. Forest system roads are typically built to follow BMP standards, stormproofed, and surfaced when fiscally feasible. BMPs are generally not implemented on user-created routes.

### RCAs and Routes

RCAs are a key component in protecting aquatic/riparian dependent species, water quality, and wildlife habitat. RCAs include areas adjacent to streams and other aquatic habitat where the primary management emphasis is on protecting and, where necessary, restoring the condition of riparian and aquatic habitats. Typically, the RCA provides corridors for wildlife and acts as a buffer to prevent impacts to water quality, such as sediment delivery. Riparian vegetation, ground cover, and permeable soils facilitate water infiltration, slow runoff, retain sediment, and in turn, decrease peak flows within a stream. A lack of vegetation, lack of ground cover, and increased soil compaction can increase peak flows and sediment delivery, and negatively affect fish habitat downstream, water quality, and stream health. Roads are compacted, exposed surfaces that can increase peak flows by expanding the existing drainage network. Roads within the RCA have a higher likelihood of impacting watershed resources because of proximity to water resources. Increased peak flows can cause channels to incise, decrease bank stability, increase sediment production, and lead to lower groundwater tables.

### Stream Crossings

Stream crossings are the most common location for sediment delivery from roads. Sediment delivery at crossings occurs from bare, hydrologically-connected, inboard road ditches, road surfaces and from crossing fill around culverts eroding into stream channels. The majority of sediment appears to be delivered from road surface and road fill slope materials that are detached and transported to the channel in road ditches after heavy road use, wet season road use, or precipitation events of great enough intensity to produce runoff. Graveled road segments tend to deliver less sediment and protect the road surface. Additionally, revegetating, rocking or armoring of inboard ditches can help minimize ditch sediment production. Research indicates that surfacing at the crossings may reduce delivery of sediment to channels by 10-25 times the existing condition. Most user-created routes do not have surfacing at stream crossings nor have they been designed to reduce sediment delivery.

### Routes and Beneficial Uses

Increased sediment delivery to streams from routes has negative affects to aquatic organisms and beneficial uses. Aquatic organisms (fish, macroinvertebrates) have difficulty adjusting to chronic

increases in sediment. Chronic sediment levels can reduce species diversity and suffocate or bury egg masses. Reduced species diversity of macroinvertebrates creates a less robust ecosystem. Increased fine sediment fills in pools, reducing summer refugia for aquatic species. Many aquatic species have temperature restrictions outside of which they cannot survive. In the project area, many streams are intermittent with only a few pools remaining year round that provide aquatic habitat. When pools are filled in or made shallower, water temperatures increase and there is less protection from predators. Increased water temperatures can result in less dissolved oxygen available for aquatic species. As water evaporates, chemical characteristics (such as salts and mineral concentrations) can increase.

Increased sediment can also lead to filling in of reservoirs, negatively affect water clarity, negatively affect variety of aquatic species used for recreation (fishing), and increase flooding potential in depositional areas. Many of the project subwatersheds have downstream reservoirs that supply municipal water for nearby populations.

### Site Specific Conditions

Common causes for resource damage observed on the project trails are related to use, poor location, poor drainage, compaction, lack of maintenance, and exploratory driving. These issues have caused reduced soil productivity and vegetative cover, increased erosion, and unstable slopes. They have also caused stream channel diversions, altered hydrologic processes related to concentration of flow and hydroconnectivity, increased sedimentation in streams, and damage to sensitive areas.

Sediment production usually increases with an increase in traffic. Driving on a native surface route or across the soil surface displaces particles on the soil surface, breaks down rock and organic matter, and chronically increases the supply of transportable material. This material can be mobilized during runoff events, especially if the route has concentrated flow. Transportation of route surface material on the project routes is evidenced by the multitude of sediment plumes on and just off most route surfaces in drainage paths (gullies, rills). Several routes have tread loss and are now the lowest spot on the terrain, artificially creating a drainage path. Implementation of best management practices in planning and design of routes helps to minimize the impact of trails and roads on resources and beneficial uses. The majority of routes surveyed were not constructed using best management practices nor have they been maintained.

Poor locations observed on surveyed routes include places such as in or adjacent to stream channels, on steep slopes, or on difficult to drain terrain. In many cases, trails have experienced tread loss, becoming the lowest point on the terrain and in turn have become a drainage course for runoff during precipitation events. Concentration of flow in the trail surface alters the natural hydrologic processes in the area related to infiltration, runoff, and erosion. Concentrated flows have more erosion power and are typically connected to stream channels, delivering more sediment to channels than the natural sediment delivery regime. The additional runoff from concentrated route drainage can also change channel characteristics such as bank stability and flooding as the additional runoff increases the size of peak flows.

The Proposed Action includes 20.4 miles of routes within the RCA. These calculations were completed using the NHD layer that does not capture all the seasonal drainages on the forest. Many trails cross or are parallel to unmapped ephemeral drainages not represented in this calculation. Unlike upland areas, routes in the RCA lack a buffer to deposit sediment before reaching a stream course. Because of proximity, a route in the RCA is more likely to be hydrologically connected to a stream and to have increased sediment delivery to a stream. Even if a trail in a RCA or crossing a RCA has drainage control structures in place to minimize resource damage, trails adjacent to and

---

crossing RCAs are more likely to deliver increased amounts of sediment than roads outside the RCA because of proximity.

Several surveyed routes observed in the RCA have rutting, compaction, concentrated flow, are hydrologically connected, and have erosion. Drainage paths off these routes typically have sediment plumes and runoff that reaches the channel. Additionally, several surveyed trails are located in the channel and have resulted in direct damage to the stream channel banks and bed, soils, and riparian vegetation.

Poor drainage on the trail surface is very common on most of the surveyed routes as routes are linear features that can easily be converted to runoff paths. Many lack drainage control structures that can minimize resource damage related to runoff and most were not constructed using best management practices. Some of the trails have drainage control structures but have not been maintained allowing the structures to lose effectiveness. Poor drainage increases concentration of flow on the trail surface, which in turn increases erosion and potential for sediment delivery to streams.

Other problems partially related to poor drainage include stream channel diversions. Several routes were observed diverting stream channels at crossings down the trail surface away from the natural flow path. This increases erosion on the route surface and generally leads to the creation of large gullies across the hillside. Stream channel diversions result in large amounts of road fill, route sediment, and hillside sediment from gully formation to be delivered to the channel.

Compaction of the trail surface causes long term changes to soil productivity and hydrologic processes. Almost all trails in the project are compacted and exhibit the effects of compaction. Compaction is the process of collapsing soil under pressure, reducing porosity and permeability and damaging soil structure. Porosity and permeability are essential for a healthy soil, as pores within the soil allow the exchange of air and water at depth that is critical for microorganisms, macroinvertebrates and plant growth. Compaction reduces porosity and permeability necessary for infiltration and increases runoff, which can contribute to increased concentration of overland flow and erosion. Compaction can alter flow paths in the soil and lead to dewatering of areas where water is diverted from. Some of the trails observed in the project that have been compacted exhibit gullies where historically there may not have been runoff paths. These sites probably had higher infiltration that has been reduced due to compaction.

Other observed resource damage included wet season use of routes resulting in rutting and soil displacement. Much like the discussion on compaction above, rutting destroys soil structure, permeability and porosity. Compaction is most likely to occur when soils are wetter. When the soil is fully saturated and water is ponded (during the wet season), soil is physically displaced as water cannot compact under pressure. Porosity in damaged soils is generally lost. Rutted areas on the surveyed routes lack vegetation and have decreased soil productivity. In some locations, existing rutting and ponding has caused users to widen the route to avoid the ponded area. Widening the route surface further increases the area of disturbance and area contributing to runoff.

Lack of maintenance on existing drainage control structures has allowed some of the routes to degrade. Some of the routes have existing drainage control structures, such as waterbars, dips, over-side drains, and culverts; however, because the routes are non-system routes, they are not on the Forests schedule for maintenance and repair. On routes needing maintenance, dips and waterbars have filled. Surface drainage has eroded around over-side drains creating gullies on the fill slope. Culverts have been buried and drainage either flows over the trail surface or is diverted down the trail surface. Failure of drainage control structures increases concentration of flow, erosion, and sedimentation. Trail use without periodic maintenance increases the probability of failure.

---

Exploratory driving off both non-system routes and system routes was common at many of the surveyed sites, as several of the surveyed sites were initially created through exploratory driving. Exploratory driving creates new routes with the potential to be in poor locations, have poor drainage, and result in compaction. Observed exploratory driving was typically seen in channels or the adjacent RCA, which are the most sensitive areas providing the most needed habitat. These routes have damaged vegetation (riparian and upland species), disturbed stream banks and stream beds, increased sedimentation downstream of disturbed sites, and decreased soil productivity.

### Road Density

Subwatersheds with higher road densities have higher risks of chronic sediment delivery. A shortcoming of road density calculations and using them as an indicator of watershed health is that stormproofing, BMP implementation, surfacing, and drainage improvements are not reflected in road density calculations despite the fact that these actions reduce chronic sediment related to roads.

Most of the road densities in the project subwatersheds on FS land are below 2 miles per square mile. A couple of watersheds have higher road densities; however, this is related to the FS owning very few acres in the watershed (ex. Dan Price Creek-Santa Ysabel Creek).

### ERAs from Roads

Equivalent Roaded Acres (ERA) is a model used to determine watershed cumulative effects. This model equates the amount of disturbance caused by past, present, and foreseeable future activities and natural disturbance to the amount of impact caused by a native surface forest road. Activities and events are assigned varying coefficients (0 to 1) that represent amount of disturbance per acre compared to the amount of disturbance of one acre of native surface road. Roads have been found to be the highest anthropogenic contributors of sediment to streams and are thus assigned a disturbance coefficient of 1. Roads are estimated to be permanent features on the landscape; other activities are assigned recovery coefficients. Subwatersheds are assigned thresholds of concern (TOC) that represent a critical value and are set based on watershed specific conditions, such as anadromous fish, listed species, beneficial uses, and physical characteristics (soil types, slope gradients, etc). The TOC represents a value of ERA where the potential for adverse cumulative effects increases and adverse water quality effects become very likely. A typical TOC for most watersheds is between 12 and 17%.

Because this project is limited to road management and decreasing road density, this analysis focuses on the ERAs of the existing road and trail system and how the Proposed Action will affect the road ERA value. The calculated road ERA value doesn't include roads on non-FS lands. FS routes contribute very little percent ERA with the majority of watersheds having less than 1% ERA from routes on FS land.

### ***Direct and Indirect Effects of Alternative 1: No Action***

There would be no change to road density and the existing trends of resource damage would continue indefinitely. Needed routes that would be added to the system and improved under the Proposed Action would not be added to the maintenance and repair schedule or have additional stormproofing; thus they would continue to degrade. Impacted RCAs in the project area would not be allowed to recover and would continue to degrade as long as use persisted. Unmanaged exploratory driving could continue to increase the area impacted by OHV use. ERAs related to roads and road densities would remain the same and may increase due to exploratory driving. Current trends in effects to beneficial uses would continue.

---

**Direct and Indirect Effects of Alternative 2: Proposed Action****Soil Compaction and Soil Productivity**

Soil compaction would be reduced through route decommissioning, restoration, and prevention of exploratory driving. Chunking and scarifying the ground surface and restoration of sites would enhance soil productivity by breaking up compaction, increasing soil permeability, and reestablishing pore space for water, air, and plant growth. Soil structure formation will take time to reestablish; however, removing vehicle use will allow the process to start. Brushing and adding organic debris to disturbed sites will not only reduce erosion but will reintroduce organic matter to depleted soils. Reducing exploratory driving will prevent further damage to soil productivity and soil structure. Soil productivity is the first step toward restoring habitat at a disturbed site.

Decreased compaction would improve infiltration, groundwater recharge, and could improve soil moisture. Increasing soil infiltration capacity would positively affect other hydrologic process such as reducing artificially high runoff and erosion rates related to routes.

**Sediment**

Overall, the Proposed Action would result in localized long-term reductions of chronic erosion and sedimentation related to the treated routes. There may be short-term (less than five years) increases in sediment related to implementation of the project (decommissioning, stormproofing, other soil disturbance); however, there would be a long-term benefit to watershed resources as the impacted sites recover and stabilize. Decommissioned sites would stabilize through reestablished vegetation, improved hydrologic processes, and eliminated motorized use. Routes added to the system would be stormproofed and maintained using best management practices. When implemented, best management practices have been found to be effective at reducing sediment related to Forest activities. Effects would not be measurable at the HUC 6 watershed scale.

Several characteristics of the surveyed routes (poor location, proximity to the RCA, poor drainage, stream channel diversions, compaction, and wet season use) are contributing to increased sediment and erosion. The Proposed Action would address surveyed sites according to the management recommendation for each site, either adding the route to the system as a non-motorized trail or road, or decommissioning the site.

As mentioned, driving on a native surface route or across the soil surface displaces particles on the soil surface, breaks down rock and organic matter, and chronically increases the supply of transportable material. Decreasing the number of roaded miles and managing road use (road closures) will reduce the supply of transportable material created by motor vehicle use.

Sediment on routes added to the system would be reduced through stormproofing, maintenance and repair. As discussed before, several routes concentrate runoff on the route surface. Stormproofing works to disperse flow and prevent concentrated runoff, decreasing the erosive power of road drainage. It also includes disconnecting road related runoff from stream crossings and reducing potential for stream channel diversion. This reduces potential for sediment delivery and for erosion/gully formation.

Routes decommissioned would no longer have motorized vehicle use and existing drainage and chronic erosion issues would be addressed through site restoration. The linear route features would no longer exist to concentrate flow and alter hydrologic processes. Chunking, scarification, and dispersal of cover in the form of rock, and/or wood and plant debris will increase surface roughness, groundcover, and infiltration. Surface roughness decreases the potential for concentration of flow and erosion of the soil surface. Ground cover will protect the ground surface from raindrop erosion and

---

soil sealing. Infiltration will prevent increased runoff that can increase erosion. Additionally, the number of stream crossings would be reduced, reducing chronic sediment delivery related to these stream crossings. Stream crossings have the highest potential for sediment delivery on roads.

Of particular importance are the routes identified for treatment that are located in the RCA. Treatment of sites in the RCA would have a beneficial effect on sedimentation caused from the routes. Because of proximity, these sites are more likely to contribute sediment and to be hydrologically connected. As mentioned in Site Specific Observations, several routes were found to be located in the stream channel, damaging stream banks, the stream bed, and riparian vegetation. Decommissioning these routes and preventing motorized use would allow the impacted channels to stabilize, reducing sedimentation. Riparian vegetation would reestablish and assist in stabilizing the channel banks. Erosion related to motorized use would decrease, and natural sediment transport regimes would reestablish.

Short term impacts of project implementation would be minimized through best management practices and project design. BMPs would be implemented to ensure compliance with the Clean Water Act. They have been approved by the State Regional Water Quality Control Board. Best Management Practices Evaluation Program is annual monitoring and reporting that the SRWQCB requires for ground disturbing activities. This project would be included in the sampling pool.

### Hydrology

Overall, the Proposed Action would result in improved hydrologic processes currently impacted by the Proposed Action routes; however, these effects would not be measurable at the HUC 6 watershed scale.

Several characteristics of the surveyed routes (poor location, proximity to the RCA, poor drainage, stream channel diversions, compaction, and wet season use) are contributing to alteration of natural hydrologic processes such as infiltration, runoff, peak flows, and channel characteristics. The Proposed Action would address surveyed sites according to the management recommendation for each site, either adding the route to the system as a non-motorized trail or road, or decommissioning the site.

Hydrologic processes on routes added to the system would be improved through stormproofing, maintenance and repair. Stormproofing works to disperse concentrated road runoff, slowing water and increasing potential for infiltration (off the road surface). It also includes disconnecting road related runoff from stream crossings and reducing potential for stream channel diversion. All of these actions reduce the increase in peak flow discharge that can result from concentration of runoff on roads and connection to streams. When peak flows are returned to a more natural range, so is the flooding potential. Channel stability increases as well.

Hydrologic processes on decommissioned routes would be improved as the linear route features would no longer exist to concentrate flow and alter hydrologic processes. Site restoration would improve infiltration, porosity and permeability. Runoff related to concentration of flow on the route surface and compaction would be reduced. Improved hydrologic processes will support vegetative regrowth, which will further stabilize the site. Groundcover added to the disturbed soils would slow runoff. Slowing runoff and increasing infiltration would decrease peak flows and channel instability. Overall, rehabilitation of hydrologic processes including dispersal of road surface drainage and disconnecting road drainage from channels would have a positive effect on local hydrology and stream habitat.

---

## **Cumulative Effects**

The Proposed Action would not result in measureable effects at the HUC 6 watershed scale. Localized effects would be beneficial to watershed resources, as currently impacted RCAs would be allowed to recover and there would be a net decrease in road density.

### Changes to Road Density

A total of ~70 miles of route are proposed for decommissioning. Because the routes are spread across the National Forest, there is not a significant decrease in road density in each of the subwatersheds. The two subwatersheds with the majority of routes to be decommissioned include Morena Reservoir-Cottonwood Creek and El Capitan Reservoir-San Diego River.

The Proposed Action includes decommissioning of approximately 18 miles of routes within the RCA, which will directly protect the RCAs that are currently being impacted by motorized access. These routes are more likely to negatively impact water quality and beneficial uses because of proximity to stream courses and sensitive habitat.

### Changes to Road ERAs

The changes to ERAs, which measures at watershed scale, are not significant and only equal to a minor reduction in the percent ERA. Morena Reservoir-Cottonwood Creek subwatershed has a decrease of 0.2%, which is the greatest decrease in ERA of the project affected subwatersheds. In this project analysis, only the ERA value of decommissioned routes contributed to a change in percent ERA. The addition of existing routes to the system did not affect the ERA value because the pre-project ERA value includes all roaded acres (system and non-system routes) on FS land in the calculation. The existing and post project ERA value for an existing non-system routed added to the system would be the same value. It is also important to note that stormproofing of existing routes is not included in the ERA calculation as the calculation only looks at roaded acres and does not consider drainage improvement. All the sites added to the system would be stormproofed to improve drainage.

### Impacts to Beneficial Uses

At the HUC 6 watershed scale, project activities will not result in significant negative or positive effects to beneficial uses. At the localized scale, activities will result in positive impacts to beneficial uses that rely on improved water quality and habitat.

### 3.1.2 – Air Quality

This project falls within the boundaries of the San Diego Air Basin and the South Coast Air Basin. According to the Regional Trends and Forecasts from the ARB Almanac 2013 for the San Diego Air Basin, “emissions are concentrated mainly in the western portion of the County.” Additional air pollution from outside areas such as the adjacent South Coast basin and Mexico can be present. The South Coast Air Basin is extremely populated and “is home to more than 43% of California’s population.” More than half of the Proposed Action will take place within the San Diego Air Basin.

The San Diego Air Basin and South Coast Air Basins are currently designated in a mix of attainment statuses for several pollutants. Some pollutant concentrations may meet federal standards but not state standards. Carbon monoxide, nitrogen dioxide, and sulfur dioxide are in attainment for both state and federal standards in both basins, as is lead in the San Diego Air Basin. A tabular representation of each pollutant’s status can be found in Table 5 (San Diego) and Table 6 (South Coast).

**Table 5.** Federal and State Air quality attainment status for the San Diego Air Basin. Areas classified as “attainment” meet the established standards of the applicable ambient air quality standard. Areas of “nonattainment” do not meet the standards and may have additional restrictions due to this status.

Criteria Pollutant	Federal Designation	State Designation
Ozone (8-hour)	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Attainment
PM <sub>10</sub>	Unclassifiable	Nonattainment
PM <sub>2.5</sub>	Attainment	Nonattainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(no federal standard)	Attainment
Hydrogen Sulfide	(no federal standard)	Unclassified
Visibility	(no federal standard)	Unclassified

Information from California Air Resources Board: <http://www.arb.ca.gov/desig/adm/adm.htm>

**Table 6.** Federal and State Air quality attainment status for the South Coast Air Basin. Areas classified as “attainment” meet the established standards of the applicable ambient air quality standard. Areas of “nonattainment” do not meet the standards and may have additional restrictions due to this status.

Criteria Pollutant	Federal Designation	State Designation
Ozone (8-hour)	Nonattainment	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment
PM <sub>10</sub>	Attainment	Nonattainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
Nitrogen Dioxide	Attainment/Unclassified	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Nonattainment	Attainment
Sulfates	(no federal standard)	Attainment
Hydrogen Sulfide	(no federal standard)	Unclassified
Visibility	(no federal standard)	Unclassified

Information from California Air Resources Board: <http://www.arb.ca.gov/desig/adm/adm.htm>

Sensitive receptors are people, places, or things that could be impacted from smoke generated by the implementation of this project. There are several sensitive receptors within a 10 mile vicinity of the project. See Table 7 for a description of sensitive receptors and the estimated distances to the project.

**Table 7. Potential sensitive receptors within and near the project.**

Potential Sensitive Receptor Type	Description	Approximate Distance (miles)
Highways / Major Routes	I-15	2
	91	1.5
	I-8	Less than 1
	79	Less than 1
Communities (selected examples, several more exist)	Alpine	Less than 1
	Holcomb Valley	3
	Warner Springs	3.75
	Corona	4.5
	Lake Elsinore	6
	Lakeside	7
	Ramona	8.5
	Campo	5
Mt. Laguna	4	
Recreation Areas	Several recreation facilities within each community.	
Wilderness Areas	San Mateo Canyon	Less than 1
	Agua Tibia	6
	Pine Creek	1
	Hauser	Less than 1

**Direct and Indirect Effects of Alternative 1: No Action**

Under the No Action alternative, no treatments would be conducted. Direct and indirect effects include current emissions and air quality trends for the project area. Under this scenario, it is reasonable to assume that OHV use and management in the project area would continue to generate low levels of both emissions and dust, which would not be expected to cause any significant local or regional air quality impacts.

**Direct and Indirect Effects of Alternative 2: Proposed Action**

Implementing the treatments of Alternative 2 would result in emissions and therefore a temporary reduction in air quality. However, the impacts from vehicle and machinery emissions will be spread out over many days with low intensity impacts. Conservative modeling results indicate that air quality standards will not be exceeded during implementation of the project from activities conducted under this Proposed Action. In addition, a decrease in routes may improve air quality by reducing fugitive dust from vehicle travel on decommissioned routes. Table 8 compares federal conformity thresholds to the project’s emissions.

**Table 8.** Alternative 2 total modeled emissions (vehicles and equipment) compared to the annual federal conformity thresholds for nonattainment areas. The model was run conservatively and results were rounded-up to three decimal points. Implementation would take place over several years.

Proposed Action Emissions by Pollutant Types (tons/year) Total							
PM 2.5	PM10	CO	CO2	CH4	NOx	ROG	SO2
0.001	0.043	5.413	900.712	0.084	7.058	0.934	0.033
Nonattainment Conformity Thresholds Measured in tons/year							
100	70	100	N/A	N/A	100	N/A	100
Project Emissions Meet Thresholds?							
Yes	Yes	Yes	-	-	Yes	-	Yes

**Cumulative Effects**

Past, present, and reasonably foreseeable activities were reviewed to determine cumulative effects to air quality using the federal conformity thresholds. This project’s emissions are under all threshold levels indicating that emissions are insignificant relative to other emissions. This project is expected to be completed over several years and impacts will occur in that timeframe. Altogether, the Proposed Action is not expected to cause any significant local or regional air quality impacts.

**3.2 - Biological Environment**

This section evaluates the effect of the No Action and Proposed Action alternatives on Threatened, Endangered, and Sensitive species, Management Indicator Species (MIS), Migratory Birds, and Weeds. See the Biological Evaluation/Assessment, MIS report, Migratory Bird Report, and Weed Risk Analysis for the more detailed analyses. These documents are included in the project record.

**3.2.1 – Threatened and Endangered Species**

Seven federally listed threatened, endangered, or candidate species have the potential to occur within or adjacent to the project areas including five animal species – Least Bell’s Vireo (*Vireo bellii* ssp. *pusillus*), California Gnatcatcher (*Polioptila californica*), Arroyo Toad (*Anaxyrus californicus*), Laguna Mountains Skipper (*Pyrgus ruralis* ssp. *lagunae*), and Hermes Copper (*Lycaena hermes*) – and two plant species – San Bernardino Bluegrass (*Poa atropurpurea*) and Thread-leaved Brodiaea (*Brodiaea filifolia*). Critical habitat occurs within or adjacent to the project areas for five of these species, all but Least Bell’s Vireo and Hermes Copper.

**Direct and Indirect Effects of Alternative 1: No Action**

Under the No Action Alternative it is reasonable to assume that continued unauthorized OHV routes will expand. Impacts associated with this increased and unmanaged use will result in resource damage to habitat and disturbance to plants and wildlife. Unmanaged recreation within this relatively small geographical area will eventually result in significant negative impacts to soil, vegetation and water quality within the area. Negative environmental impacts associated with unmanaged recreation within this area include: direct disturbance and/or destruction of wildlife, vegetation destruction through creation of unauthorized trails, litter and waste, and increased potential of wildfire through unauthorized vehicle and associated activities. Potential negative indirect and cumulative effects to federally listed threatened and endangered species from the No Action alternative include the

continued disturbance and degradation of their habitats from unauthorized motorized use within these areas which reduces habitat suitability for wildlife species.

### ***Direct and Indirect Effects of Alternative 2: Proposed Action***

#### Least Bell's Vireo

No negative direct or indirect effects to this species are expected from the Proposed Action alternative. There are three unauthorized routes that occur within or adjacent to known occupied or historically occupied vireo territories. All three of these sites are within Hauser Canyon. Potential direct effects to vireos at these sites are limited to noise disturbance during decommissioning activities. No riparian habitat or vegetation is proposed for removal or disturbance and a limited area (.07 miles) of route restoration is proposed. To avoid impacts to this species, it is recommended that decommissioning activities at these three sites do not occur during the breeding season (March 1 to August 1); or vireo surveys are conducted to determine if this species is present within or immediately adjacent to the project area between March 1 and July 1.

No negative indirect effects from the action alternative are expected to this species. Beneficial indirect effects to this species from the Proposed Action include eliminating the continued use of these unauthorized routes which contribute to habitat degradation and species disturbance. No critical habitat for this species occurs within the proposed project areas.

#### California Gnatcatcher

No negative direct or indirect effects are expected to the California Gnatcatcher from the proposed project. No proposed routes requiring restoration earthwork contain suitable coastal sage scrub habitat and are largely unvegetated roadbed. Beneficial indirect effects to this species from the Proposed Action include eliminating the continued use of these unauthorized routes which contribute to habitat degradation and species disturbance.

A total of 23 unauthorized routes occur within designated gnatcatcher Critical Habitat. No long-term or permanent negative effects are expected because the routes are located within unsuitable or marginally suitable habitat, routes are mostly unvegetated and there are limited earthwork activities proposed. Beneficial effects to Critical Habitat include the elimination of continued unauthorized motorized use and the re-establishment of native vegetation within the routes.

#### Arroyo Toad

Potential negative direct effects to arroyo toads from the action alternative include the accidental death, injury, or disturbance to individual toads from the decommissioning earthwork. This impact is not expected due to the site conditions of the routes (compacted roadbed) and limited area of disturbance within riparian areas or suitable toad habitat. Three routes totaling 0.25 miles or 0.36 acres intersect with suitable habitat where toads may occur and 29 routes totaling 3.75 miles intersect with Critical Habitat. To avoid potential direct effects to arroyo toads, these sites will be surveyed prior to and monitored during decommissioning activities. In addition, any work within the three identified sites will be under a limited operation period to avoid potential effects to this species.

There are no known potential negative indirect effects from the action alternatives to this species or its habitat. Beneficial indirect effects to this species from the Proposed Action include eliminating the

---

continued use of these unauthorized routes which contribute to habitat degradation and species disturbance.

### Laguna Mountains Skipper

No negative direct or indirect effects are expected to the Laguna Mountains Skipper from the proposed project. No proposed routes requiring decommissioning earthwork are located within occupied or suitable Skipper habitat. Only one route (UND386) is proposed for decommissioning earthwork, and the remaining routes are being converted to trail or added to administration only roads. Proposed decommissioning actions within the historic Skipper occurrence locations include restoration of approximately 0.50 miles (0.75 acres) of old road bed on Palomar Mountain and adding a route as administrative use on Mount Laguna. No decommissioning earthwork is proposed on the four routes that occur within designated Critical Habitat; three are being added to the Forest road system as administrative use only and one route is being converted to non-motorized trail.

Beneficial indirect effects to this species from the Proposed Action include eliminating the continued use of these unauthorized routes which contribute to habitat degradation.

### Hermes Copper Butterfly

No negative direct or indirect effects are expected to the Hermes Copper from the proposed project. Only one route (16S03-Carveacre) is proposed for decommissioning earthwork where Hermes Copper are known to occur. Proposed decommissioning actions within this area include earthwork on approximately 1.6 miles of route. To avoid any impact to this species, all decommissioning activities would remain within the roadbed prism as much as possible and all Spiny Redberry plants (their host plant) would be flagged and avoided.

Beneficial indirect effects to this species from the Proposed Action include eliminating the continued use of this road and associated human activities that contribute to habitat and host plant degradation.

### San Bernardino Bluegrass

No negative direct or indirect effects are expected to this species from the proposed project. No occurrences of this plant are known within any of the proposed routes. One route (UND162) on Mount Laguna is within designated Critical Habitat. No effect to Critical Habitat is expected as this route is an existing driveway 0.08 miles in length and is proposed to be added to the Forest Road system. Approximately 0.03 miles of this route is within Critical Habitat.

### Thread-leafed Brodiaea

No negative direct or indirect effects are expected to this species from the proposed project. No occurrences of this plant are known within any of the proposed routes. One route (8S01-3-54L-1) along Margarita Peak Road on the Trabuco Ranger District is within designated Critical Habitat. This route is a pull-out approximately 0.02 miles in length. Decommissioning includes the placement of 21 feet of barrier to block access with no earthwork proposed. The site consists of bare disturbed ground.

### 3.2.2 – Regional Forester’s Sensitive Species

The project area contains potential habitat for 18 Regional Forester’s sensitive species, including 8 animal species – Gray Vireo (*Vireo vicinior*), Orange-throated Whiptail (*Cnemidophorus hyperythrus*), San Diego Mountain Kingsnake (*Lampropeltis zonata* ssp. *pulchra*), San Diego Ringneck Snake (*Diadophis punctatus* ssp. *similis*), Coastal Rosy Boa (*Charina trivirgata* ssp. *roseofusca*), Red-diamond Rattlesnake (*Crotalus ruber*), California Legless Lizard (*Anniella pulchra*), and San Diego Horned Lizard (*Phrynosoma coronatum*) – and 10 plant species – Jacumba Milk-vetch (*Astragalus douglasii* var. *perstrictus*), San Diego Milk-vetch (*Astragalus oocarpus*), Ramona Horkelia (*Horkelia truncata*), Heart-leafed Pitcher Sage (*Lepechinia cardiophylla*), Orcutt’s Linanthus (*Linanthus orcuttii*), Laguna Mountain Aster (*Machaeranthera asteroides* var. *lagunensis*), Felt-leafed Monardella (*Monardella hypoleuca* ssp. *lanata*), San Felipe Monardella (*Monardella nana* ssp. *leptosiphon*), Moreno Currant (*Ribes canthariforme*), and Gander’s Butterwort (*Packera ganderi*).

#### **Direct and Indirect Effects of Alternative 1: No Action**

Under the No Action Alternative it is reasonable to assume that continued unauthorized OHV routes will expand. Impacts associated with this increased and unmanaged use will result in resource damage to habitat and disturbance to plants and wildlife. Unmanaged recreation within this relatively small geographical area will eventually result in significant negative impacts to soil, vegetation and water quality within the area. Negative environmental impacts associated with unmanaged recreation within this area include: direct disturbance and/or destruction of wildlife, vegetation destruction through creation of unauthorized trails, litter and waste, and increased potential of wildfire through unauthorized vehicle and associated activities. Potential negative indirect and cumulative effects to sensitive species from the No Action alternative include the continued disturbance and degradation of their habitats from unauthorized motorized use within these areas which reduces habitat suitability for wildlife species.

#### **Direct and Indirect Effects of Alternative 2: Proposed Action**

##### Gray Vireo

Potential negative direct impacts to this species are limited to short-term disturbance from route restoration and decommissioning activities. No negative indirect effects are expected to these species from the Proposed Action. Positive indirect and cumulative effects to this species from the Proposed Action include reducing the number of unauthorized OHV routes and activities which will reduce impacts and disturbance to this species and its habitat.

##### Orange-throated Whiptail, San Diego Mountain Kingsnake, San Diego Ringneck Snake, Coastal Rosy Boa, Red-diamond Rattlesnake, California Legless Lizard, and San Diego Horned Lizard

Potential negative direct effects to these species from the Proposed Action include the potential loss of individuals from decommissioning and restoration (heavy equipment) activity. This is not expected to be significant due to the limited area and duration of individual route decommissioning activities and unsuitable habitat conditions within the routes. There are no known potential negative indirect effects from the action alternatives to this species or its habitat. Beneficial indirect and cumulative effects to this species from the Proposed Action include eliminating the continued use of these unauthorized routes which contributes to potential mortality and habitat degradation.

##### Jacumba Milkvetch, Heart-leafed Pitcher Sage, Felt-leafed Monardella, San Felipe Monardella, Gander’s Butterwort, Moreno Currant, and Ramona Horkelia.

Potential negative direct effects to these species from the Proposed Action include the potential loss of a limited number of individuals from decommissioning and restoration (heavy equipment) activity. This is not expected to be significant due to the limited area of impacts from route decommissioning activities and unsuitable habitat conditions within the routes. These three species have been documented within the general area of five routes. To avoid impacts to these species, routes where these species may occur would be surveyed prior to decommissioning activities. Plant populations would be flagged and avoided to greatest extent possible. There are no known potential negative indirect effects from the action alternative to these species, except for the monardella species.

Potential negative indirect effects to the two monardella species include the closing and restoration of two routes (UND386 and UND386-0.67L-1) on Palomar Mountain which may provide the preferred disturbed habitat conditions for these species.

Beneficial indirect and cumulative effects to these species from the Proposed Action include eliminating the continued use of these unauthorized routes which contributes to potential mortality and habitat degradation.

#### San Diego Milkvetch, Laguna Mountains Aster, and Orcutt's Linanthus

No negative direct or indirect effects are expected to these species or their habitats from the Proposed Action. These species are not documented within the unauthorized route areas, and habitats within the unauthorized route locations are generally unsuitable for plant occurrence.

Beneficial indirect and cumulative effects to these species from the Proposed Action include eliminating the continued use and/or expansion of these unauthorized routes which contributes to potential mortality and habitat degradation.

### **3.2.3 – Management Indicator Species**

The project area contains potential habitat for 10 Management Indicator Species including 5 animal species – Mountain Lion (*Felis concolor*), Mule Deer (*Odocoileus hemionus*), Arroyo Toad, California Spotted Owl (*Strix occidentalis* ssp. *occidentalis*), and Song Sparrow (*Melospiza melodia*) – and 5 plant species – Engelmann Oak (*Quercus engelmannii*), Big-cone Douglas Fir (*Pseudotsuga macrocarpa*), Coulter Pine (*Pinus coulteri*), California Black Oak (*Quercus kelloggii*), and White Fir (*Abies concolor*). Potential effects to Arroyo Toad are described in Section 3.2.1 rather than here.

#### **Direct and Indirect Effects of Alternative 1: No Action**

Potential negative indirect and cumulative effects to Management Indicator Species from the No Action alternative include the continued disturbance and degradation of suitable habitat from continued unauthorized motorized use which impacts vegetation and reduces habitat suitability for wildlife and plant species.

#### **Direct and Indirect Effects of Alternative 2: Proposed Action**

The Proposed Action would have no measureable negative direct, indirect, or cumulative effects to any Management Indicator Species because no activities are proposed that would fragment, reduce, or negatively impact vegetation or habitat conditions for the identified and/or representative species. The Proposed Action would benefit all listed Management Indicator Species by reducing the number of unauthorized routes within sensitive habitat areas, thus reducing wildlife species disturbance, habitat degradation and associated changes to natural processes such as hydrology, vegetation composition, and fire frequency.

---

### **3.2.4 – Weed Risk Analysis**

Isolated populations of highly invasive yellow starthistle (*Centaurea solstitialis*), tamarisk (*Tamarix* spp.), and Spanish broom (*Spartium junceum*), exist within the project area, including along several unauthorized routes.

#### ***Direct and Indirect Effects of Alternative 1: No Action***

Continued OHV use of unauthorized routes within the project area under the No Action alternative could result in the introduction of new invasive weed species as well as the spread of existing infestations.

#### ***Direct and Indirect Effects of Alternative 2: Proposed Action***

The decommissioning of unauthorized routes would not contribute to the spread of invasive weeds, due to the incorporation of prevention measures into the Proposed Action, and would also greatly reduce the future potential establishment of invasive weeds in these areas. For additions to the road and trail Systems, maintenance and monitoring would increase the likelihood of prevention, early detection, and rapid response to new infestations relative to the existing condition.

---

## **3.3 - Social Environment**

This section evaluates impacts of the two alternatives to recreation and public safety and cultural resources.

### **3.3.1 – Recreation and Public Safety**

The Cleveland National Forest Motorized Travel Management decision of November 12, 2008, prohibited cross-country motor vehicle travel by the public off designated National Forest System roads, trails, and areas, as depicted in Cleveland National Forest Motor Vehicle Use Maps.

Unauthorized routes throughout the project area are unmaintained and often quite steep, and their use does not constitute recreation due to its illegal nature, as prohibited by 36 CFR 261.13.

#### ***Direct and Indirect Effects of Alternative 1: No Action***

There would be no direct or cumulative effects to recreation or public safety under the No Action alternative. Safety issues would persist, and the recreational experiences of those seeking primitive recreation opportunities or intact scenery within the project area could be further impacted by the expansion of unauthorized routes.

#### ***Direct and Indirect Effects of Alternative 2: Proposed Action***

The Proposed Action would have both short and long term effects on recreation and public safety, and these effects would be positive for both motorized and non-motorized recreationists in the project area. The Proposed Action would not have any cumulative effects on recreation and public safety.

Recreational opportunity would be lost for the current motorized users of Carveacre Road (16S03), who are technical riders with highly capable OHVs, and made more challenging for hikers, mountain bikers, and climbers. Meanwhile, recreational opportunity would be created through the addition to the System and maintenance of 6 relatively short routes for motorized public access and 10 routes as non-motorized trails. The motorized routes include a motorized trail off Bear Valley Road that would be accessible to many green-sticker vehicle riders looking for a more challenging ride. The other 5 would provide vehicle access to dispersed camping sites and viewpoints in desirable locations. The 10 non-motorized trail additions are those unauthorized routes that lead to desirable locations but

where vehicle access would have adverse resource impacts. Their improvement and maintenance would improve recreational opportunity in these areas.

For non-motorized recreationists, more intact scenery and less noise and sign of human activity would improve the recreational experience throughout the project area in the vicinity of unauthorized routes. For some that prefer to walk on wider, road-like trails, the restoration of unauthorized routes could detract from their recreational experience, while it would improve the experience of those seeking more primitive experiences. The Proposed Action would not alter the Recreational Opportunity Spectrum or Scenic Integrity Objective ratings for any lands within the project area.

Two unauthorized routes totaling 1.5 miles in length would be eliminated in the Hauser Wilderness, thereby improving its wilderness character for the long-term despite short-term use of motorized equipment on one route needed to reduce resource impacts. A new non-motorized trail would be added to the System for access from the Rancho Carrillo community into the San Mateo Wilderness. While the trail already exists, its maintenance would reduce resource impacts, thereby improving wilderness character. Ten miles of unauthorized routes would be decommissioned in areas zoned as Recommended Wilderness, improving their wilderness character, and eight miles of unauthorized routes would be decommissioned within Inventoried Roadless Areas, where road-building is particularly restricted.

The decommissioning of unauthorized routes throughout the project area would avert safety issues associated with the use of trails that were neither designed nor maintained, are not patrolled, and are often quite steep. Another safety concern associated with the motorized use of unauthorized routes is increased wildfire ignitions due to dispersed campfires and vegetation or rocks scraping the undercarriages of vehicles. The decommissioning of Carveacre Road would eliminate similar safety concerns given its condition, which far exceeds the typical capabilities of high-clearance, 4-wheel-drive vehicles, making it inaccessible to law enforcement and fire suppression resources and less safe than other National Forest System Roads. On the other hand, the addition of several National Forest System Roads for administrative use would improve safety by ensuring that wildfire suppression facilities are maintained and accessible.

Roads that would be added to the National Forest System under Alternative 2 fall within suitable Land Use Zones, including Developed Area Interface, Back Country, and, only for administrative roads, Backcountry Motorized Use Restricted.

Altogether, Alternative 2 would improve recreational opportunity and experience and public safety on the Cleveland National Forest.

### **3.3.2 – Cultural Resources**

#### ***Direct and Indirect Effects of Alternative 1: No Action***

Direct, indirect, or cumulative effects to cultural resources under the No Action alternative would consist of the damage to 29 prehistoric or historic sites throughout the project area that are crossed by unauthorized routes. Direct impacts would result from ground disturbance by the vehicles themselves, while indirect impacts would include ongoing soil erosion and resultant exposure of cultural resources, exploratory vehicle use off the unauthorized route, and looting of cultural artifacts. Cumulative effects would consist of these effects combined with other effects to cultural resources due to recreation, fuels, special uses, facilities, and resource projects.

---

**Direct and Indirect Effects of Alternative 2: Proposed Action**

All areas where the Proposed Action would occur have been surveyed for the presence of cultural resources, and 29 prehistoric or historic sites were found to be crossed by unauthorized routes.

**Direct Effects to Historic Properties:** The potential for direct effects to historic properties associated with the proposed project would include ground disturbance associated with the proposed extreme surface roughening for decommissioned route restoration, the use of a mechanical excavator or hand tools to loosen compacted soils and prevent further erosion, and the installation of pipe-rail barriers to prevent re-entry of decommissioned unauthorized routes by motorized vehicles. These activities have the potential to have a direct effect on historic properties that are within or directly adjacent to the segments of unauthorized routes for which decommissioning is the proposed management recommendation. The potential for direct effects to historic properties also exists for ground disturbing maintenance actions that may occur in the future for unauthorized routes that would be added to the National Forest System for Administrative or Public Use, which would both allow for the ongoing use of these routes by motor vehicles.

**Indirect Effects to Historic Properties:** The potential indirect effects to historic properties would be limited for unauthorized routes proposed for decommissioning, as the proposed decommissioning and barrier construction would reduce rather than increase the potential for effects to historic properties in the vicinity by limiting OHV access and erosion within and in the vicinity of restored unauthorized routes, and that the Standard Protection Measure of “Flag and Avoid” would be implemented for all known sites during all restoration and barrier installation implementation. There would be a potential for indirect effects associated with unauthorized routes proposed for administrative or public use, but the Standard Protection Measure of “Flag and Avoid” would be implemented for all known sites during any future road maintenance activities, which would avoid the potential for effects to historic properties.

**Cumulative Effects to Historic Properties:** Potential cumulative effects to historic properties would be reduced by the implementation of the proposed project. The proposed barrier construction and decommissioning of unauthorized routes would reduce rather than increase the potential for cumulative effects to historic properties. Unauthorized routes that may currently have the potential for having effects on historic properties associated with their ongoing use would be decommissioned in association with the proposed project. Implementation of the required Standard Protection Measures, including avoidance and monitoring will avoid potential effects to historic properties during implementation of ground disturbing activities associated with the restoration of decommissioned routes or any future maintenance of routes added for motorized use.

The analysis finds that there would be no adverse effect to historic properties by implementation of this project where Standard Resource Protection Measures would be used to protect, manage, or maintain historic properties in a manner that avoids adverse effects (p. 7).

The analysis of the Proposed Action complies with Section 106 of the National Historic Preservation Act of 1966, as amended in accordance with provisions as amended in accordance with the provisions of the *Programmatic Agreement among the U.S.D.A. Forest Service, Pacific Southwest Region (Region 5), the California State Historic Preservation Officer, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forest of the Pacific Southwest Region (RPA 2013)*.

---

## 4 - PERSONS, GROUPS, ORGANIZATIONS, AND AGENCIES CONSULTED

The Forest Service consulted the following Tribes; Federal, State, and local agencies; and organizations during the development of this EA:

### **ID TEAM MEMBERS:**

Bleadorn, Spencer	former Recreation and Lands Officer, Descanso Ranger District
Christiansen, Donn	former Descanso District Ranger
Fredrickson, Bjorn	former Recreation and Lands Officer, Palomar Ranger District
Friedlander, Joan	former Palomar District Ranger
Fudge, Emily	Forest Hydrologist
Harvey, Steve	former Forest Archaeologist
Heys, Jeff	Forest Planner
Klemic, Karin	Acting Forest Archaeologist
Nick, Andrea	Southern California Province Air Resource Specialist
Quintana, Devin	Forest GIS Specialist
Rodriguez, Jake	Recreation and Lands Officer, Trabuco Ranger District
Vance, Darrell	Trabuco District Ranger
Wells, Jeff	Forest Wildlife Biologist
Winter, Kirsten	Forest Biologist

### **TRIBES:**

Viejas Band of Kumeyaay Indians

### **FEDERAL, STATE, AND LOCAL AGENCIES:**

U.S. Department of Homeland Security, Border Patrol  
State of California, Division of Off-Highway Motor Vehicular Recreation

## 5 - REFERENCES

USDA Forest Service, 2005. *Land Management Plan: Cleveland National Forest*. San Diego, CA. Available online at: <http://www.fs.usda.gov/detail/cleveland/landmanagement/planning/>

USDA Forest Service, 2012. National Best Management Practices for Water Quality Management on National Forest System Lands. FS-990A.

USDA Forest Service, 2015a. Air Quality Report. Forest-wide Unauthorized Route Decommissioning. Cleveland National Forest files.

USDA Forest Service, 2015b. Biological Assessment and Evaluation. Forest-wide Unauthorized Route Decommissioning. Cleveland National Forest files.

---

USDA Forest Service, 2015c. Cultural Resource Management Report. Forest-wide Unauthorized Route Decommissioning. Cleveland National Forest files.

USDA Forest Service, 2015d. Hydrology Report. Forest-wide Unauthorized Route Decommissioning. Cleveland National Forest files.

USDA Forest Service, 2015e. Management Indicator Species Report. Forest-wide Unauthorized Route Decommissioning. Cleveland National Forest files.

USDA Forest Service, 2015f. Noxious Weed Risk Assessment. Forest-wide Unauthorized Route Decommissioning. Cleveland National Forest files.

USDA Forest Service, 2015g. Cleveland National Forest Draft Travel Analysis Report. Cleveland National Forest files.

## **APPENDIX A - RESPONSES TO COMMENTS**

### **Access**

- 1) General opposition statements to closing roads per the Travel Management Plan.

The vast majority of routes proposed for decommissioning through this project are already closed to motorized public use through the Motorized Travel Management decision of 2008. Only two National Forest System Roads would be closed through this project: 1) An impassable, administrative, 2-mile-long segment of 17S08, South Boundary Road, is severely eroding. A passable road through private lands connects to both of its ends, and so it is not needed. 2) A steep, 1.6-mile-long segment of 16S03, Carveacre Road, is currently passable only by high-clearance, 4-wheel-drive vehicles. It is severely eroding and impacting sensitive biological resource areas, and its use presents unacceptable fire hazards and safety risks. Its decommissioning would also render an additional 2.6 miles of 16S03 inaccessible to motorized use by the public. Administrative use of this additional length would continue, given its gated connections to other roads at both ends.

- 2) Your job is to maintain the roads, not close them.

See response to comment 1.

- 3) Please continue to maintain historic access roads and provide access to the lands that we love and pay to maintain.

See response to comment 1. Public access to unauthorized routes would not be eliminated by the Proposed Action. Motorized access, by contrast, would be eliminated.

- 4) Historical roads could conceivably be protected by historical preservation laws. Those roads deserve protection and research, not closure. Closing them would be a tragic loss of historical value.

Parallel with the NEPA process, the Forest has conducted the Section 106 process in compliance with the National Historic Preservation Act of 1966, as amended (36 CFR 800). As part of that process,

---

---

we have considered effects to historic properties that may be eligible for the National Register of Historic Places. To summarize the findings, no adverse effect to historic properties is expected from implementation of the Proposed Action.

- 5) These roads are needed by the Forest Service in case of any emergency and/or Forest maintenance services.

The vast majority of unauthorized routes are not needed by the Forest Service. The few that are needed by the Forest Service are proposed as additions to the National Forest Road System through this project (p. 5).

- 6) This project flies in the face of RS2477, which is in full effect for any road, trail, or path in existence prior to 1974 – and can easily be proven through existing FS maps. RS2477 also states that *\*any\** road, created for *\*any\** purpose, is granted right-of-way by Congress – and thus these are not “Unauthorized Routes.”

The County of San Diego has asserted no RS2477 claim for these particular routes.

- 7) Use of the funding from the California Off-Highway Vehicle (OHV) Grants Program is a slap in the face. The funding is to create and maintain Off-Highway Vehicle (OHV) sites and access, not to close roads.

The funding obtained by the Cleveland National Forest from the California OHV Grants for this project was specifically set aside for restoration of damage caused by OHVs and are not available for OHV planning, operations, or maintenance.

- 8) The FS has already closed far too many roads and we recreationists have been squeezed into smaller and smaller 'corridors' in your foolish attempt to return the land to some idealistic state of perfection.

See response to comment 1. The desired conditions of the Cleveland National Forest are laid out in its Land Management Plan, which was revised in 2005 through a public process.

- 9) Another reason I oppose the closures is if our access points are taken away it will leave the few remaining areas extremely crowded. I like to enjoy our public lands to get away from the crowds and city life. If the old routes are taken away it means there will be more congestion, trash, and take away from the "outdoor experience."

See response to comment 3. Access points would not be taken away by the Proposed Action. See also the Recreation and Public Safety analysis on pp. 44-45.

- 10) The San Diego Chapter of the National Wild Turkey Federation is a strong supporter of their “Save the Habitat, Save the Hunt” initiative, which directly affects wildlife and the habitat for all. Roads which improve access availability should be a priority, not a consideration for closure.

See responses to comments 1 and 3.

- 11) Several of these roads provide hunting access and allows groups like Quail Forever, San Diego Chapter to access and maintain wildlife drinkers on public lands.

See response to comments 1 and 3. Wildlife drinkers and guzzlers could still be accessed and maintained without motorized access.

- 12) These closures will affect Quail Forever's access to a wildlife drinker up behind the Buckman Springs Rest Stop. It will also close the old "deer camp road" just to the east that provides hunting access. These roads are marked \*UND844\* and \*UND889\* on the closure maps.

These two unauthorized routes were mistakenly included in the scoping map despite that they were previously authorized for decommissioning through the Descanso District Unauthorized Route Decommissioning 2014 Decision Memo. They were decommissioned in the summer of 2015.

- 13) There are several roads designated for closure at Buckman Springs Road & Bear Valley Road that provide hunting access. One of those road closures will block Quail Forever's access to a drinker box and wildlife drinker.

See responses to comments 1, 3, and 11.

- 14) The road slated for closure off of the Cameron Truck Trail, \*UND9531\*, provides Quail Forever access to a guzzler as well as Cameron Spring. It also allows hunters to park off of the Cameron Truck Trail.

See responses to comments 1, 3, and 11. A parking area along Cameron Truck Trail would remain after implementation of the Proposed Action.

- 15) It looks like an access road off Kitchen Creek Road when dog training is allowed, \*UND9065\* is slated for closure as well as two further up marked \*UND8323 & 15S17A-11R1\*. These last two provide Quail Forever access to a drinker box and a wildlife drinker and hunting access east and south.

See responses to comments 1, 3, and 11.

- 16) There is a road designated \*UND518\* along Long Valley Road slated for closure that may provide access to a wildlife drinker as well as restrict hunting access.

See responses to comments 1, 3, and 11.

- 17) Many of the roads on the closure map lead to springs and other water containers for wildlife. I have hiked to many of the springs on the map and have cleaned them up every year. If you take away access to clean and maintain the springs and water containers for wildlife, many animals will suffer during our droughts.

See responses to comments 1, 3, and 11.

- 
- 18) There is another hunting access road at \*UND865\* in the Four Corners area slated for closure. This good passable road allows access south and is regularly used. What's the rationale for closure?

See response to comment 1. This particular route also enters the Hauser Wilderness, where motorized vehicles are prohibited.

- 19) There are several offshoot roads along the \*Tule Springs Road\* slated for closure. The area already has no public access? It is included in the "No Name" Wilderness that was designated a couple of years ago. I asked the USFS to allow me into the area back in 2012, via \*Tule Springs Road\*, to look for three wildlife drinkers but never heard back from the Forest Service after my initial inquiry.

See responses to comments 1, 3, and 11. There is no public motorized access to this area.

- 20) We need access to what is ours to enjoy, respect, and save for generations to come after us.

See response to comment 3.

- 21) The public should never lose access to public lands.

See response to comment 3.

- 22) Not everyone can hike into the National Forest to experience it. Disabled people in particular need vehicle access. Federal ADA laws protect individuals with disabilities access and that access can not be removed, hampered, or diminished to gain this access without violation of the individuals Civil Rights.

There is currently no legitimate motorized access to unauthorized routes, and so the Proposed Action would not affect access for these routes. With regard to the System roads that would be decommissioned by the project, see response to comment 1 for the reasons and note that motorized access would be eliminated for all people, not just disabled people.

- 23) Without people the forest becomes a vast impregnable jungle of brush.... The authorities out here always say they will keep trails clear and open for travel but it never seems to happen..... Miners and prospectors are a god-send when it comes to accessible trails.

See responses to comments 1 and 3. The unauthorized routes are neither roads nor trails and therefore have no need for maintenance.

- 24) I have heard from many of my constituents who have concerns with the manner in which this effort is proceeding and the adverse affect it can have on recreational access to our forest lands, which I know you understand is a high priority for our area in San Diego County.

See response to comment 3. The use of unauthorized routes by motor vehicles is an illegal activity and therefore does not constitute recreational access. The Cleveland National Forest will continue to provide legitimate recreational access to the public, while protecting sensitive resources.

25) These closures will significantly and unreasonably curtail reasonable levels of access to forest lands by me, my family, and friends due to physical limitations that many of us face as part of routine life.

See response to comment 1. There are many legitimate motorized opportunities available across the Cleveland National Forest.

26) With these proposed closures, I will not be able to reasonably access lands that I have hiked, bird watched, and hunted free range organic pesticide free wild game for many years. I have long suffered from a lower back fracture and pain in my L 7 and suffered from knee pain and swelling following a knee operation 30 years ago. The inability to drive to these general areas unreasonably limits access.

See responses to comments 1, 3, 24, and 25.

27) With these proposed closures, my aging father will not be able to reasonably access many parts of the forest to hike with me because of the road closures would dramatically limit reasonable access for an individual that can only walk and hike short distances. The inability to drive to these general areas unreasonably limits access.

See responses to comments 1, 3, 24, and 25.

28) With these proposed closures, the young children of my friends will not be able to reasonably access many parts of the forest to hike with us because of the road closures would dramatically limit reasonable access for young children that can only walk and hike short distances.

See responses to comments 1, 3, 24, and 25.

29) There is a distinct age and activity preference discrimination to these sorts of closures.

See responses to comments 1, 3, 24, and 25.

30) I oppose the Cleveland NF decommissioning project, it is wrong and it works against the poor and middle class!

It is unclear how the project “works against the poor and middle class.”

31) While it is understood that the forest has a variety of considerations when evaluating whether a route can remain open, the list of reasons in the scoping letter did not address access. When routes go to places with resources such as mines, viewpoints, streams or lakes, the forest should look for ways to keep the route open, or failing that, find an alternate route that can be opened. We hope the forest will apply standard authorizing criteria to all the identified routes, not close them simply because they are not in the Forest inventory.

See responses to comments 1 and 3. Unauthorized routes are not proposed for decommissioning “simply because they are not in the Forest inventory.” See the Purpose and Need section on p. 2 for the reasons behind the Proposed Action.

- 32) The proposal takes a simplistic, forest-based approach that views public access to county areas as detrimental for California, when in fact they vary wildly across the state. Finally, the Forest Service does not properly evaluate the cumulative effects of the proposal. Among other things, it does not properly evaluate the impact of increased lack of public recreational access.

See responses to comments 3 and 24.

- 33) I would like to suggest an alternative to the closure. Ask the groups using this access to help maintain the roads and do the cleanups. We know that there are some who break the rules, but we would rather work with you and clean up their problems, than be restricted from our endeavors.

See responses to comments 3 and 23.

- 34) Most of the forest lands in San Diego are extremely thick with tick infested brush. If the public cannot walk and hike on old roads and trails there will be no way to enjoy our public lands without getting covered with ticks.

See responses to comment 3. National Forest System Roads and Trails provide recreational opportunities with reduced tick exposure.

- 35) If the old roads and trails are taken away the fire danger will be increased. The last thing we need is more thick brush. The old roads at least provide fire breaks and access for fire fighters to travel through our public lands.

Wildland firefighters do not use unauthorized routes for motorized travel, except in the event of emergencies, when they may be opened for use, if needed, by heavy equipment regardless of their status.

- 36) I see this as an irresponsible act to put the national forest in danger of uncontrollable wild land fire. This would be due to the roads no longer available to get heavy equipment to remote site where the possibility of disastrous fires might occur.

See response to comment 35.

- 37) We pack in and out, remove dangerous metals safely from the land, and actively volunteer to clean the land when others pollute our precious homeland. Please reconsider your actions to close more roads in the Cleveland National Forest. Please consider the recreational miner and the good we do when we do have access to these great lands.

See responses to comments 1 and 3. Volunteer stewardship of National Forest System lands is greatly appreciated. People who wish to access areas under the authority of the General Mining Act do have a right of reasonable access. The level of activity will generally determine what kind of access is

---

reasonable. The need for large equipment to develop a deposit may require road construction or reconstruction, whereas the use of small equipment such as pans, sluices or even dredges may only require access by foot. The need for vehicle access through a closed road may require a gate, reconstruction, reclamation and requisite bonding, all of which would be authorized under a plan of operation (36 CFR 228).

38) Miners are entitled access to their Federal Mining Claims under the Mining Law of 1872.

See response to comments 3 and 37. Miners engaged in activity authorized by the General Mining Act do have a right of reasonable access, commensurate with the level of activity proposed. For decommissioned routes, this may require authorization through a mining plan of operation which could require gates, maintenance standards, reconstruction standards, a reclamation plan, and a bond.

39) Stop closing OUR roads, stop putting up gates and obstructions to OUR valid mining claims and prospective mineral areas, start regulating intrusive and destructive motor vehicles. This means restrict vehicles that are destroying our roads and trails under the guise of “recreational” purposes and support vehicles that are there rebuilding roads and trails for economic purposes.

See responses to comments 1, 37, and 38. Decommissioned routes could be reopened and used if required for reasonable access authorized under a plan of operation.

40) Whatever roads are being considered for closure need to have alternative routes for the miners to access their claims before closing any roads.

See responses to comments 1, 3, 37, 38, and 39.

41) It is an unnecessary burden to require miners to manually carry in mining equipment and supplies to their claims.

See responses to comments 37, 38, and 39. Reasonable vehicular access could be authorized through a mining plan of operation, and could include use of all-terrain vehicles, high-clearance vehicles, or the like. Authorization could be provided under a plan of operation.

42) If you stop a miner from mining his claim, you could be liable for takings.

See responses to comments 3, 37, 38, 39, and 41. The Proposed Action would not stop any miner from mining his or her claim. Reasonable access can be provided through a plan of operation.

43) Recent court decisions have shown that mining is a protected activity and local regulations cannot limit travel or access to a federally registered mining claim.

See responses to comments 3, 37, 38, 39, 41, and 42.

44) After looking at your map on the Routes I have a question on UND 509 (T16S, R4E, sec. 25) also known as Long Valley Trail. Our group, S.P.M.A. , has a valid Mining Claim (SPMA Long Valley) with a notice of Intent that uses this trail as an access road to our claim. We

---

also have on file a Special Use Permit for this trail at your office. Why is this UND route on this map when it was pulled from last years Barrier proposal ??

See responses to comments 3, 37, 38, 39, 41, and 42. The unauthorized route in question is not permitted for motorized use. In response to public concerns, it was removed from a prior decommissioning project on the condition that the applicant seek alternative access to their mining claim from outside of the riparian conservation area. Given that no alternative access has been sought, the route is once again proposed for decommissioning.

45) Also looking at the same map, I see you are going to decommission another route- UND 9077-79 ( T16S, R5E, Sec. 19,20). I am confused on this route since multiple groups use the route. S.P.M.A. uses it to access their claim (SPMA Starlight) . Also Cal Fire can use this route to fight fires on the upper reaches of the hill since the route ends at the 3/4 mark of the hill height and there is a nice flat area for equipment and personal to fight fires. Finally I have seen Border Patrol /Homeland Security vehicles use the route to watch for illegal activity on the valley below.

See responses to comments 1 and 3. See responses to comments 3, 37, 38, 39, 41, 42, and 147. The unauthorized route in question is in a highly sensitive area.

46) Descanso District Unauthorized Route Decommissioning restricts the access of small scale miner to access their claims in this area. Some of the claims members/holders are seniors, veterans, and people with disabilities (handicap). In the link <http://www.dol.gov/dol/topic/disability/ada.htm> to the ADA page, it can be clearly seen, "governmental activities" are covered under the law. The ADA does not only apply to improvements made to a specific area, but to all types of work done under their management. The decommissioning of these roads are discriminating against the disabled. The right of reasonable access for purposes of prospecting, locating and mining is provided by the mining law. Such access must be in accordance with the rules and regulations of the USFS (36 CFR 252) or the BLM (43 CFR 3809). The right of access is a non-discretionary RIGHT of the miner and is not subject to a right of way permit by law.

See responses to comments 1, 3, 22, 37, 38, 39, and 41.

47) The Cleveland Nation Forest uses a document called Land Management Plan(LMP) as a planning document, which involves the project 43836 Descanso District Unauthorized Route Decommissioning of Roads used by small scale miners is completely inadequate. It is so generalized that it is impossible to determine its environmental impacts on wildlife, plant communities, water and air quality, visual and aesthetic resources, recreation, soils, and invasive weed spread. The proposal takes a simplistic, forest-based approach that views public access to county areas as detrimental for California. When in fact the pros and cons vary wildly across the state. These access roads have been used for almost a 100 years by the miners and the public. All the roads are on the TOPO maps. The Forest Service cannot, by law, just say "it needs to be closed". The Forest Service's own document States this clearly. Forest Service Manual web link: [http://www.fs.fed.us/geology/locatable\\_minerals.html](http://www.fs.fed.us/geology/locatable_minerals.html) FSM 2800 - MINERALS AND GEOLOGY Chapter 2810 - MINING CLAIMS 2813.14 – "Right of Access to Claim - The right of reasonable access for purposes of prospecting, locating, and

---

mining is provided by statute. Such access must be in accordance with the rules and regulations of the Forest Service. However, the rules and regulations may not be applied so as to prevent lawful mineral activities or to cause undue hardship on bona fide prospectors and miners.” 2814.24 – “Provide Reasonable Alternatives - Forest officers should provide bona fide prospectors and miners reasonable alternative access routes, exploration methods, special use permits, and operating plan provisions in order that they may carry out necessary mineral associated activities.” It is unreasonable for the Forest Service to say to the miners that are seniors, veterans and handicap to just go ride a horse to your claim. This is unreasonable and unacceptable period! The Forest Service cannot, by law deny "reasonable access or cause an undue burden in accessing mining claims." The Cleveland National Forest Service supervisors and employees either do not know this, or they are ignoring it and this is unacceptable!

See responses to comments 1, 3, 22, 37, 38, 39, and 41. The Cleveland National Forest Land Management Plan was approved in 2006 following a substantial public process. Its content falls outside the scope of this project.

48) I am writing in regards to the proposed decommissioning of roads in the Cleveland National Forest, specifically those in the Buckman Springs and Long Valley loop. Our association has two mining claim areas in those areas that utilize the current road systems. From my review of roads to be decommissioned, it would appear that our two claims would become inaccessible. I would like to propose that we come to a compromise solution where motorized traffic would be limited in these areas. My solution would be to simply have a locked gate at the entrance to these two existing roads. Both roads are dead-ends, thereby an access gate would be an easy compromise. Keys to the general public would be limited to legal owners of federal claims in those areas.

The roads I am referring to are listed on your maps as:

Buckman  
UND9073  
UND9077  
UND842  
UND9076

Long Valley  
UND509

See responses to comments 1, 3, 37, 38, 39, 41, 44, and 45.

### ***Recreation Management***

49) Specifically, the concerns I have received, and share, center on the fact that this project is seemingly being conducted with a priority on a wholesale closure of unauthorized routes as opposed to the full and thorough inspection of the routes with the goal of incorporating as many into the forest inventory as possible.

See responses to comments 1 and 3. “Incorporating as many into the forest inventory as possible” would not meet the Purpose and Need for the project (p. 2).

- 50) The authorized routes are quite dull to drive on and often these parallel 4x4 routes give the forest user a little feeling of actually being in a wild forest, and often the view of the surrounding area is better from these routes.

One motorized trail in particular is proposed to be added to the National Forest System to provide a more interesting and scenic ride off Bear Valley Road, a popular OHV destination. The Cleveland National Forest has many Level 2 roads and two OHV areas that are not viewed by most drivers to be “dull to drive on.” And while the motorized user of unauthorized routes may experience a “wild forest,” others recreating in the area may have the opposite experience due to the motorized trespass.

- 51) Hikers can benefit also as the motorized use helps control the encroachment of common plants that can harbor deadly rattle snakes on the sides of the otherwise narrow trails.

Rattlesnake encounters should be expected and precautions taken whenever recreating on the Cleveland National Forest.

- 52) We suggest that you consider the following, as part of the Environmental Assessment prepared for the project:
1. Extended monitoring. There could be few decommissioned routes that will still attract OHV interest 5 years after closure, but if monitoring could be optionally extended beyond 5 years at any problem closure site it might be possible to ultimately retrain or outlast the uncooperative OHVers.
  2. Use of state of the art technology. Game trail camera and drone camera surveillance technology could be a cost effective method for collecting data about success and failure of closure sites. Imagery could also be valuable for educational, training and other purposes.
  3. Create substitute virtual OHV route trips to meet OHV demands for routes to explore. (This would need partnership with the video game industry.)
  4. Authorized drone trails. This could create a novel recreational activity that might mitigate perceived reduction of OHV opportunities. Have designated trails and/or free-flight zones where drones can be flown safely and legally.

The Proposed Action would neither prohibit nor require monitoring beyond five years. The use of game trail cameras and drone cameras are currently infeasible, since there is no budget to support their purchase. Virtual OHV trips and authorized drone trails are interesting ideas for our recreation staff to consider, but their creation falls outside the scope of this analysis.

- 53) We think the greatest challenge for completing a successful project will be communicating with and educating the public, while attempting to keep persistent OHV enthusiasts from re-entering closed sites, while also trying to teach and train all other OHVers to respect and observe the authorized sites and boundaries for their activities throughout the Forest.

Public communication is extremely important for this project, and to that end the Proposed Action includes signage for each site while our management approach includes regular patrols by Forest staff.

54) Enhanced signage would help to ensure that riders are aware of routes that are not authorized.

Signage would be installed at each site to direct riders to authorized areas for vehicle use.

55) My only concerns will be how to keep your work intact and avoid more of these types of incursions. Appropriate signage that shows the open routes and available route maps are one of the best ways to help, in my opinion. Showing clear designated routes will encourage the responsible users to stay on the correct trail. You will probably have to have some sort of barriers in some spots, but the more "positive" signs showing arrows and "open", the better.

See response to comment 54.

56) Enforcement of the existing authorized route plan is a major issue to address.

See response to comment 53.

57) Sufficient funds have to be allocated to enforcement to stop the usage of unauthorized routes and the damage to surrounding properties. Forest Service personnel are competent professionals dedicated to carrying out the mission of the Forest Service as reflected in the Forest Plan that was developed over many years of public input. Unless enforcement of the authorized route designations is given a high priority and adequate funding is provided for this purpose, a fundamental pillar of the Forest Plan will be undercut.

See response to comment 53.

58) Penalties for using unauthorized routes should be hefty enough to make an impact on a rider.

Fines for motorized access off designated roads and trails average \$150 and could range up to \$500, but violators could also be held accountable for much greater restoration costs.

59) Issuing Permits that entail identification cards/placards that are highly visible would help with enforcement (done all the time for fishing from boats in the rivers of the West).

Such a permit need would fall into the jurisdiction of the State of California and so is outside the scope of this analysis.

60) Engaging the responsible leaders and enthusiasts of the ORV community to assist in educating and, where necessary, self-policing ORV riders who disregard the authorized route limitations will be an important part of this process. I imagine most ORV riders are very happy to pursue their recreation within the established rules that govern the varied use of the Forest by the public. If legal, reasonable use of the Forest is not fostered by the ORV community, the public opposition to this use of the Forest will only grow.

Cleveland National Forest staff are continually working to engage OHV leaders and communities in rider education and stewardship. This does not reduce the need for the decommissioning project.

---

61) The scoping letter states that "unauthorized routes contribute to other illegal activities on the forest, such as dumping, target shooting and dispersed campfires..." this logic could be also used for authorized routes. If this criteria were to be strictly followed, every single route in the forest would need to be closed. I am sorry that there is target shooting, dumping and dispersed campfires, but those are not the fault of the routes and should not be used as excuses to close them.

The difference between unauthorized routes and authorized routes in the context of illegal activities results from the lack of patrol and enforcement by Forest staff, the searching out of such areas by those with something to hide, and the lack of maintenance that can lead to fire starts.

62) The County of San Diego Department of Parks and Recreation (DPR) appreciated the opportunity to review the Draft EA for the Forest-wide Unauthorized Route Decommissioning. DPR supports the Forest-wide decommissioning of unauthorized off-highway vehicle (OHV) routes in order to protect environmental sensitive resources and to curtail unauthorized/illegal activities.

This supportive comment is appreciated.

63) Please advise the County if decommissioning unauthorized OHV routes:

- Will have any impacts on routes currently designated or proposed for non-motorized, multi-use (pedestrian, equestrian and mountain biking)
- Will allow any decommissioned routes to be made available for non-motorized use
- Will allow the creation of any new non-motorized trails plans to be developed using some of the decommissioned OHV routes
- Will allow for non-motorized trail loops using some the decommissioned routes

This project would not affect any existing designated non-motorized trails, and the only proposed trails that would be affected are those proposed during the comment period on the Draft EA. Any of the decommissioned routes would be available for non-motorized use. Eleven routes would be added to the National Forest Trail System as non-motorized trails, improved for those uses, and maintained over time. No non-motorized trail loops have been proposed by the Forest Service, but public comments on the Draft EA have proposed such loops.

64) The EA states only .4 miles in the Palomar Ranger District (PRO), of the Cleveland National Forest, will be added for non-motorized use. Prior to the proposed recommendation of decommissioning unauthorized OHV routes, was there a study that looked at keeping some of the alignments for non-motorized use? If so, is this study available for comment?

Any of the decommissioned routes would be available for non-motorized use. The survey of the unauthorized routes by the project interdisciplinary team and subsequent discussions with National Forest managers led to the proposed additions to the National Forest Trail System as non-motorized trails. This analysis was not prepared as a separate study.

65) DPR's following comments relate specifically to two of the County-wide identified non-motorized, multi-use regional trails. DPR staff has been working closely with the PRD staff on alignments for the Trans County Trail and the San Diego River Trail through the Cleveland

---

National Forest. These two regional trails have also been discussed and identified in the Southern California Land Management Plan and Final Record Decision.

El Cajon Mountain Area Exhibit of the Draft EA:

This area provides alignments for both the Trans County Trail and the San Diego River Trail. The proposed alignment for the San Diego River Trail starts near El Capitan Reservoir El Monte Road in Lakeside and goes north. Just north of the Descanso and PRD's boundary, the Trans County Trail coming from the County's El Capitan Preserve to the east connects with the San Diego River Trail. From this point, both regional trails continue north sharing the same alignment on the Westside Truck Trail into Ramona. This proposed alignment, using the Westside Truck Trail, was reviewed by PRD staff.

DPR requests review and consideration to retain the proposed decommissioning of 13S10-16.8R2 around the stock pond for a non-motorized trail loop. This would provide an interesting scenic alternative .75 mile route and possible rest area for trail users.

The Cleveland National Forest acknowledges support for and participation in planning of the Trans County Trail and San Diego River Trail. Nevertheless, the potential addition of the requested trail loop, because it directly supports a proposed trail that will be analyzed separately, falls outside the scope of this project. The decommissioning of this route to remedy resource issues would not preclude its addition as a non-motorized trail at a later time, especially since barriers would not be installed through this project. However, the property also has a Williamson Act contract still in place that prevents the Forest Service from designating trails for recreational use. Trail designation is not listed among the permitted uses in the contract, which would expire in ten years if the Forest applied to San Diego County for its non-renewal.

66) Boulder Creek Road Area and Cedar Creek Area Exhibits of the Draft EA:

Prior to the EA, DPR along with the assistance from the PRD staff, identified the proposed alignment for the Trans County Trail from the Saddleback area (Cedar Creek Area Exhibit) at the intersection at Eagle Peak and Cedar Peak to Boulder Creek Road (Boulder Creek Road Area Exhibit). This route, along Cedar Creek Road, is currently open to OHV and highway legal vehicles. This route, as the alignment for Trans County Trail, would have to share this single vehicle width dirt road with OHV and highway legal vehicles. Cedar Creek Road has some steep grades with very few areas for stopping/passing to allow traffic (motorized or non-motorized) traveling in the opposite direction to pass. Retaining OHV and highway legal vehicle uses would propose serious hazards for all users but especially for the non-motorized users. This section of Cedar Creek Road that allows OHVs is only approximately 3.5 miles long with County public roads at both ends. This would require OHVs to turn around and go back the way they came since they would be prohibited on the County roads.

DPR would appreciate it if the Forest Service, PRD, would consider closing this 3.5 mile section to both highway legal vehicles and OHV and only allowing non-motorized use. Emergency and administrative uses would be allowed.

Cedar Creek Road is a National Forest System Road that is open to use by green-sticker vehicles. It is not considered to be resulting in unacceptable resource conditions or public health and safety impacts. As with the previous comment, the consideration of vehicle use associated with a segment of the

---

Trans County Trail belongs with analysis of the proposed trail. The future considerations fall outside the scope of this analysis.

67) I was looking at your Maps of proposed routes to be decommissioned. You have a section of Anderson truck trail, und314 & 313, this section of old forestry road is used daily by hikers and mountain bikers. I'm 66 and ride or hike Anderson several times a week and no matter what day or time I will encounter other people out there. On weekends there will be as many as 50 people hiking and mountain biking in that area. This has turned in to a great recreational resource that requires virtually no maintenance from the forestry service. I personally have been building water bars on the old trail/road that runs along the lake. Many other groups are involved in trail maintenance also. Recently the Viejas reservation has begun construction on a wire fence through this area which will be very detrimental to wildlife living in that area and requires input from the forestry service. The ill will from the Viejas action towards the mountain biking community needs to be addressed also. I believe a gate at the northwest end of the Mesa grande property will suffice to restrict access to this area by the motorized community and is the only action needed to preserve this area by the Forestry service.

There is no legal public access to this portion of the Cleveland National Forest. Furthermore, unapproved trail maintenance activities on the National Forest are prohibited. If a route was identified with legal access and without resource concerns, it could be proposed for addition as a non-motorized trail at a later time. Finally, non-motorized use of the National Forest would not be prohibited in this area by this project, which instead would decommission unauthorized routes.

68) The area called Anderson Valley / Capitan Grande is a very popular mountain biking area, and the mountain bike trails should not be closed. All of the Anderson Truck Trail should be maintained for mountain biking.

See response to comment 67.

69) A significant portion of the recreational interests of the outdoor recreationist's portion of our population is dependent on access to public lands. While these lands are typically administered by government entities, such as, CDFW, CNF, BLM, and the USFWS – we should always remember... they don't own it. It belongs to the public – and that's us!! This is a matter that must be deal with effectively; and, it may ultimately require litigation by members of the public. In general, as it relates to the Public's Land, the 'mission statements/charters' for all of these organizations states in some form or another, that they have a managerial responsibility to insure the health, diversity, and productivity of the public lands they administer for the use and enjoyment of present and future generations." In fact, I believe this sentiment is clearly alluded to within the CNF mission statement. The problem in this regard is: all too frequently these organizations (at least, IMHO) are prone to be driven from within by an "anti-our-recreational-interests" element that focuses on the preservation of the lands they administer, without a balance of planning for conservation with the appropriate accompanying use by the public. I believe this is inspired by an 'irrational animus.' The typical modus operandi of this "Anti... Element" is to focus their management attention and support almost exclusively on the first part of the aforementioned mission statement – while ignoring the second half. Please note: EO 13443 does not say "preserve" hunting opportunities, it uses the words "expand and enhance". We must not let this practice continue

---

to go unchecked, or unchallenged. To be valid and appropriately legitimate, every decision that deprives the public of the opportunity for recreational activities must be predicated on objective, auditable scientific, or safety-based data. I'm convinced this "Anti... Element" doesn't usually have the requisite data -- because it doesn't exist. This anti-element must be made to understand that just saying it -- doesn't make it so and, accordingly the public should not be made to accept their decisions without the aforementioned corroboration. These 'administrators' must be made to expect significant consequence when they arbitrarily or capriciously take away our opportunity for recreational activities. And, more importantly, it's becoming increasingly apparent that members of the public must develop the capability/capacity to appropriately focus the imposition of a 'punitive consequence' to bear on those that are responsible.

This EA, and its supporting documents in the project record, provide the scientific and management basis for decommissioning efforts, and several recreational improvements are being proposed through the project, as described in Chapter 2.

- 70) These road "closures" will directly affect and impair the ability of Quail Forever, San Diego Chapter to access and work on several wildlife drinkers, commonly known as guzzlers. Quail Forever has located, repaired and maintained the guzzlers for decades, since their original installation in the late 1940's and early 1950's. There is no other organization in San Diego County that has more experience in this work than our organization...

Quail Forever San Diego Chapter has grave concerns about some of the pending road closures. Many of the closures will directly impact the work that we do. We are not opposed to the closure of some of the roads, per se. For instance, 9S07-Palomar Divide on the High Point Area Map. That road really goes nowhere and creates erosion. There are other close by places to park and camp. What we do oppose is closure that prevents our work on drinkers and guzzlers and impairs the ability of the general public to pull off of main roads to park and have access to car camping, hunting, hiking, birdwatching and the like.

See responses to comments 1, 3, and 11. Volunteer activities that support National Forest management are greatly appreciated. Parking areas would be retained wherever possible for decommissioned routes.

- 71) Anderson Valley, Capitan Grande Indian Reservation Area:

The closure of roads UND313 & UND 314 will prevent access to a wildlife drinker. The closure of roads SUA114 will prevent access to a wildlife drinker.

See responses to comments 1, 3, and 11. There is no legal public access to these routes, and motorized use of them is already prohibited.

- 72) Boulder Creek Road Area: The closure of 13S08 will prevent parking access. The only available parking access in this area would be on private land.

13S08 is Boulder Creek Road, which is not proposed for closure. If this comment is intended for 13S08-8.83R-1, room for parking would be retained if possible.

---

73) South Boulder Creek Road Area: The closure of UND375 will prevent parking access. The only available parking access in this area would be along the road.

This route lies behind a locked gate, and so parking is already only available along the road.

74) Buckman Springs Area: The closure of UND9073 & UND9077 will prevent our access to a guzzler and a wildlife drinker box. The closure of UND9070 will deny access to parking and car camping. As noted above, our access to work on guzzler 159 on the north side of I-8 has already been blocked! We request that part of the road that is now blocked be reopened so our work can continue!

See responses to comments 1, 3, 11, and 12. Motorized use of these routes is already prohibited.

75) Carveacre Area: Closure of 16S03 will prevent our access to a guzzler along the road, just below Lawson Peak. There seems to be no other public access via 17S09 from the west and 16S03 from the northeast? Both start on private lands.

See responses to comments 3 and 11. Motorized access to this guzzler would be eliminated by Alternative 2, since the other entry points to this area lie on private lands.

76) Hauser Wilderness Area: The closure of UND865 will prevent parking and camping access to the wilderness area. If this road is to be closed, it should be at the southern wilderness boundary and not at Skye Valley Road. I note that the road is already blocked by a pipe fence with a locked section. The lock should be removed unless weather or fire conditions warrant otherwise. UND8102 is already blocked by a welded pipe fence?

See responses to comments 1, 3, and 11. Motorized use of these routes is already prohibited.

77) South Kitchen Creek Area: Depending on where the closure starts, the closure of UND8323 will hamper us from access to a guzzler. Roads UND379, Kitchen Creek 1, 2 and 3 are often used for dog training. 15S17A-0.11R1 allows for access, car camping and parking off of Kitchen Creek Road. I note that Kitchen Creek Road has become very popular with cyclists. Closure of these spur roads will force the public to park along the roadside, forcing cyclists into the center of the road to pass safely.

On the south side of I-8, the closure of UND9531 will block our access to a guzzler. The closure of UND525, Cameron TK TR-2.34R-1 and Cameron TK TR-174R-1 will block the only parking available along the Cameron Truck Trail, a narrow road at those points.

See responses to comments 1, 3, and 11. Motorized use of these routes is already prohibited. Parking areas would be retained wherever possible for decommissioned routes.

78) Lake Morena Area: UND9549 provides parking access off of the Cameron Truck Trail, the only parking available in this area!

See responses to comments 1, 3, and 11. Motorized use of this route is already prohibited. A trailhead here would provide parking access.

79) Long Valley Area: The closure of UND502 will prevent parking access for our work on a guzzler, the only viable parking spot in the area.

See responses to comments 1, 3, and 11. A parking area would be retained if possible.

80) Pamo Valley Area: The closures of UND106 and UND887 will hamper our work on guzzlers in both areas. The closure of UND9003 will prevent camping and parking along Santa Ysabel Road (12S07), a very narrow road.

See responses to comments 1, 3, and 11. Motorized use of these routes is already prohibited. Parking areas would be retained wherever possible for decommissioned routes.

81) Pine Creek Area: UND872 has been closed for many years. Why is it listed? We have a guzzler up that road that is now inaccessible. Was it closed without proper public review? If so, we would like it reopened to the point where we can access the guzzler! Pine Creek 1, 2, 3 and 4 provide the public access and camping opportunities, as does UND985.

See responses to comments 1, 3, and 11. UND872 was previously closed but not effectively decommissioned, and so resource damage persists. Motorized use of the other routes is also already prohibited. Parking areas would be retained wherever possible for decommissioned routes.

82) Tule Springs Area: Roads UND720A, UND720B and UND736 provide access to two possible guzzlers. This entire area has no public access. We do not want any road closures until the area can be checked and the guzzlers are located.

See responses to comments 1, 3, and 11. Motorized use of these routes is already prohibited.

83) Will Valley Area: Closing UND386 will block the only access and parking point in the area to public lands. We want enough of the road left open to provide access and parking.

The parking area at the start of this route would be retained by Alternative 2.

84) This letter is a formal input from the San Diego County Wildlife Federation (SDCWF) regarding the Draft Environmental Assessment (EA) for the Unauthorized Route Decommissioning Project. SDCWF is a coalition of 20 local organizations in San Diego County, including 5 shooting ranges, 5 dog training clubs and several fish and wildlife conservation organizations. The combined membership of our member organizations is approximately 12,000 individuals and families in San Diego County. Our primary concern with the EA is that the impact on public access is not adequately addressed. Our members have been concerned for some time about the proliferation of gates in the Forest that is resulting in less and less access to the Forest.

On 13 May, 2013 we submitted comments regarding our concerns about the proliferation of locked gates and the designation of Inventoried Roadless areas. We also pointed out that the present trend in closing roads was denying hunting access, and was contrary to Executive

---

Order 13443, which directed the Forest Service “to facilitate the expansion and enhancement of hunting opportunities”. The proposed project would further impact not only hunters but other members of the public who visit the Forest for recreational activities.

See response to comments 1 and 3. It is not clear that decommissioning unauthorized routes denies hunting access or reduces hunting opportunities. Given that motorized use of these routes is already prohibited, hunting access would be unchanged, and hunting opportunity may increase without the current motorized vehicle use of unauthorized routes. See the Recreation and Public Safety section of the EA (pp. 44-45) for further detail.

- 85) We certainly agree with the objective to conserve our natural resources in the Forest. However, we believe that conservation and public access are not inconsistent goals, and that with an open dialog between the Forest Service and the public stakeholders the interests of all users of the Forest can be accommodated.

Our specific recommendations are:

Delay the implementation of the EA and the Road Decommissioning Project until the public has the opportunity to thoroughly assess the impact and a comprehensive dialog between Forest Service staff and the public has occurred;

In those specific cases where preservation clearly has priority over access, road closures should be accompanied by providing parking to allow access into the Forest on foot. We are sure there are cases in which vehicular traffic would have a negative impact, but foot traffic would not. As an example of the latter, consider Eagle Peak Road. There are miles of dirt road with very few opportunities to park safely off the road, which results in lack of access to the Forest even on foot;

As stated by Mr. Richards, the proposed road closures will impact QF’s ability to repair guzzlers, a primary source of water for our local wildlife, particularly during this current drought. Surely the conservation value of these guzzlers outweighs any conservation benefit from denying access to QF.

SDCWF stand ready to participate in a dialog specifically directed toward the road closures described in your maps. We represent many conservation organizations and can provide knowledgeable individuals who can engage in a productive dialog on both the conservation and public access considerations in the proposed road closures.

See responses to comments 1, 3, and 11. We agree that conservation and public access are not inconsistent goals, and this project represents an attempt to address both goals. It is not clear what would constitute an “open” or “comprehensive” dialog. Parking areas would be retained wherever possible for decommissioned routes, and no area would be closed to public access by Alternative 2. With the exception of Carveacre Road, motorized access to guzzlers is already prohibited on routes to be decommissioned, and so motorized access would only be denied to one guzzler. A dialog is encouraged beyond this project in order to bridge the gap between users’ expectations of the National Forest and its management.

- 86) This letter is a formal input from the San Diego Chapter of Safari Club International regarding the Draft Environmental Assessment (EA) for the Unauthorized Route Decommissioning Project. SCI is recognized world-wide as a leading wildlife and

---

conservation advocacy organization and is dedicated to protecting the public's right to recreate on public lands, specifically in regards to hunting. Our primary concern with the EA is that the impact on public access has not been adequately addressed. Our members have been concerned for some time about the proliferation of gates in the Forest that aid resulting in less and less access to the Forest. As currently planned (according to the multiple maps that were presented on your web site), the proposed road closures will further exacerbate our concerns.

Dennis Richards of the San Diego Chapter of Quail Forever has submitted a letter to you dated December 17, 2015, in which he outlines the impact of 13 proposed road closures. I will not repeat his excellent list of concerns, but simply point out that San Diego SCI completely agrees with them. These closures will seriously adversely affect the access that the public currently enjoys to the Forest.

We certainly agree with the noble objective to conserve our natural resources in the Forest. However, we believe that conservation and public access are not mutually inconsistent goals, and that with an open dialog between the Forest Service and the public stakeholders the interests of all users of the Forest can be accommodated.

See responses to comments 1, 3, 11, 84, and 85.

87) I am writing to you in response to the "Unauthorized Route Decommissioning" in the CNF. As a member of Quail Unlimited and its successor Quail Forever for the past thirty years I am concerned with the CNF's erection of the iron pipe barriers to the quail guzzlers that we have been locating and rehabbing for the last thirty years. In many cases these barriers will make it impossible to get the necessary equipment to the guzzlers to properly maintain them. In the past we have been able to work with the CNF staff to gain the necessary access to the guzzlers. I would hope that we could reach some kind of agreement with the CNF so that we could maintain access to these guzzlers so we can maintain them. I have enclosed pictures of the variety of wild life showing that they use and depend on these guzzlers for their water.

See responses to comments 1, 3, 11, and 85. If it is necessary to get equipment to the guzzlers, a special use authorization would be needed. The pictures are appreciated; they show wildlife using the guzzlers, but they do not show that wildlife depends on the guzzlers.

88) I've spent some of my outdoor hours in the repair & maintenance of the so-called Guzzlers here in San Diego County and in other So-Cal Counties since mid-1970's. What is the criteria used for labeling a road an IRA, by the way this is misleading wordage? These are not 'Roadless Areas' currently but in a short time they will be. Please refer to E.O. 13443 (April 2007) and H.R. 4089, both are aimed at giving the sportsman opportunities to recreate on 'Public Lands'. This will not be possible with the current road closures. We at Q.F. (Quail Forever) were in hopes of establishing an amicable relationship between Q.F. & F.S. After meetings with Don Christenson (NFS) it appeared this relationship was about to occur. Don was relocated before we could conclude any stipulations/decisions. Coincidental appearance of both the SDG&E Power Line Towers and the Piped Gates across many of the roads causes much suspect resulting in a proactive negative view by the public toward NFS. QF's sole purpose is habitat maintenance - specifically guzzler repair is a major portion of our outdoor

---

activities. Many of your so-called IRA's contain guzzlers. These 'Piped Barriers' allow our members NO access to the guzzlers because of the distance needed to be traveled with heavy equipment. Vehicular access is required. I'm hopeful QF & NFS can come to some agreement of understanding where QF will be allowed access to these guzzlers. We at QF are eager for an open discussion with FS personal pertaining to this matter.

See responses to comments 1, 3, 11, 85, and 87. Inventoried Roadless Areas (IRAs) are not the only areas where Alternative 2 would decommission unauthorized routes. Motorized vehicles are restricted to designated roads and trails throughout the Cleveland National Forest.

89) The San Diego County Varmint Callers, a member of the San Diego County Wildlife Federation, would also like to voice our concerns about the proposal to further restrict access to the Cleveland National Forest. Our members, along with other Federation members, depend on access to the CNF for our conservation efforts. As Quail Forever Project Coordinator Dennis Richards pointed out in his letter, the repair of guzzlers and other projects that wildlife depend on for their survival would be seriously, if not totally, curtailed.

Our club members have participated in many projects over the years to assist various species of wildlife in their survival. Our club has built guzzlers, repaired windmills, cleared springs and provided controlled access points to sensitive areas, all in the effort to help our wildlife survive predation and human encroachment issues. The closure of access roads is not the answer and, as pointed out by San Diego County Wildlife Federation President Robert Smith in past and current letters, appears to directly contradict Executive Order 13443, which directed the Forest Service "to facilitate the expansion and enhancement of hunting opportunities".

The San Diego County Varmint Callers, as part of the San Diego County Wildlife Federation, would like to add our opposition to these closures and join in the request to stay their implementation until proper public comment can be heard and considered.

See responses to comments 1, 3, 11, 84, and 85.

90) I know from personal experience with previous generations that some of these roads have been in used for decades. Some of the proposed closures make sense for the reasons stated in the proposal, but the gusto with which roads have been selected are alarming. Even before this proposal is implemented I've been dismayed at the number of locked gates, steel barriers, and power lines that have appeared in a few short years and I'm sure towering windmills on public land are soon to come. The point being, both the beauty and the accessibility of the Forest is rapidly being destroyed.

My concerns, and therefore objection, to the 'Unauthorized Route Decommissioning' are twofold:

1) As a member of an aging population, road closure equals access denied. The public who are midlife and older cannot hike the backcountry for the distances needed as the result of 'route decommissioning.' Closing of many of the little spurs and dead-ends makes sense. But please at least consider leaving room for parking for those who may now hike what they used to drive. And please reconsider closing roads that provide access to areas that would then have no alternative access without hiking miles and/or trespassing private land.

---

2) Outdoor organizations such as Quail Forever have maintained water sources called guzzlers for many years. These provide a water source to all kinds of wildlife. This is excellent mitigation in an era of drought and global warming. The Forest Service's road 'route decommissioning' will put an end to the ability to service many of these guzzlers. (The fact that these guzzlers were installed in the 1940's by vehicles carrying supplies in itself speaks to the longevity of many of the routes being closed).

See responses to comments 1, 3, 11, 22, 85, and 87. It is acknowledged that many of the unauthorized routes proposed for decommissioning have been in existence for many years.

91) The way trails are decommissioned is an offense to nature in itself, ripping out fallen trees that house inhabitants (insects, rodents, etc.) and ramp havoc on what started out as deer and cow trails in the first place. Are you going to put up signs to let the wildlife know what this is a decommissioned trail? Once you rip out the trails, people will just follow the next deer/cow trail until it becomes established. Then you guys can waste more money to draw up fancy maps so you can decommission some more.

Instead, you could work with people (hikers/bikers/riders) and actually generate revenues (take a look at Moab, UT). You could also give the kids an opportunity to get away from uTube, the iPads and television. Anderson truck trail has many, many 12 year olds, 16 year olds, 25 year olds and old farts like me (47) that enjoy Anderson Truck trail on a close to daily basis.

These trails are an escape from every day live that allow thousands of people to replenish and get their body in shape. Anderson truck trail (and all the other ones you had time to map out) are nationally known – people come here from all over the world to enjoy these trails. You have people other than me, who have moved here for these trails – whether in Lake Morena, up in the Laguna's or just in my hometown of Alpine.

See responses to comments 1 and 3. The project is intended to achieve ecological restoration, not harm, and will not close any area to non-motorized access.

92) Also, you say "disbursed" camp sites.....more than 300 feet off a road, are "contributing to illegal activities, such as camping, shooting, hunting and camp fires".

The Purpose and Need section of the EA (p. 2) notes that "unauthorized routes contribute to other illegal activities on the Forest, such as dumping, target shooting, and dispersed campfires, that can lead to costly and damaging wildfires." Neither camping nor hunting are considered illegal activities, if conducted in accordance with rules and regulations.

93) We actually need more trails not less, so why not incorporate those trails into the system? They work and are excellent, so no more closed trails, no matter who creates them!

Alternative 2 would add 12 trails to the National Forest Trail System and would not close any designated trails.

---

94) I have read through the Draft Environment Assessment and I feel very strongly that the Cleveland National Forest should decide on the No Action Alternative. I am a frequent visitor to the Cleveland National Forest with my family. We often take long hikes to the many scenic and more remote areas of our public land. After studying all of the posted maps, I have concluded that if the old trails and roads are decommissioned we will lose access to the majority of the Cleveland National Forest.

Most people visit our public land to get away from the crowds in our urban areas. If you close many of the dirt roads and trails the few remaining roads will be extremely congested. Please take a look at nearby Mission Trails. They are having that problem now. They are quoted in the San Diego Tribune as saying their popular trails are being loved to death with all of the trash and the negative impact that heavy crowds leave behind.

Please do not destroy our access to our public lands and force everyone into the same areas. All of the public needs equal access to recreate on our beautiful public land.

See responses to comments 1 and 3. Areas where unauthorized routes would be decommissioned by Alternative 2 would be less congested than they are now and open to non-motorized recreation.

95) My comments regarding unauthorized routes being decommissioned have to do with overdoing a good thing. Certainly nobody wants true damage to the habitats of endangered species. But lets face it, you are treating all motorized access off main routes like it is always a bad thing.

With few exceptions, the areas I am most familiar with in the Trabuco Ranger District have not been harmed by motorized use so much you need to erect more steel barriers and boulders to the few places left where motor vehicles get a little off the road.

As described on p. 2 of the EA, motorized vehicles on the Cleveland National Forest are restricted to designated roads and trails by its Land Management Plan.

96) Our ownership includes properties on El Cajon Mountain, along the Anderson Truck Trail, along Eagle Peak Road and Boulder Creek Road. Therefore we are interested in these actions not simply as a nonprofit organization with a mission dedicated to the San Diego River Watershed, but also as a landowner. We have limited our review to proposed decommissioning within and nearby the San Diego River Watershed. Our comments are based upon the maps provided on the project web site.

Inaja and Upper San Diego River Area.  
We support the proposed actions.

El Cajon Mountain.

We generally support the proposed actions. We have some concern that the proposed closing will eliminate optional alignments for a multi-use trail through this area. In some case, these routes may enhance the recreational experiences of trail users. The regional San Diego River Trail is proposed to follow the West Side Truck Trail. Since it is a multi-purpose trail, we recommend consideration of providing at least one option for a secondary trail through this

---

area. It will provide a secondary alignment if it becomes necessary to split uses (such as biking). 13S10-15.77L1, 13S10-15.72L1, 13S10-17.03L2 are examples of routes that could be utilized if maintained.

#### Cedar Creek Area

We support the proposed actions except for 13S06-5.2R1. We would like to see this route remain until the route for the South Rim extension of the San Diego River Trail is finalized. With the designation of this area as proposed Wilderness and the anticipation of a trail parallel and in the general vicinity of Eagle Peak Road, we strongly recommend that this route remain available until this future trail alignment of the San Diego River Trail and/or Trans County Trail is fully analyzed and determined.

#### South Boulder Creek Road

We support the proposed action for UND 125 and 375.

#### Boulder Creek Road Area

We support the proposed actions except:

UND 114. Without a further analysis of the need and impact of opening a new area for public use, we do not believe this action is warranted. Before this action is taken, a further analysis should be conducted. As a nearby landowner, we would be concerned that this new proposed public use area would generate traffic and other impacts on Boulder Creek Road, impact the Boulder Creek ecosystem and have the potential to impact nearby landowners.

We are aware of sensitive species in and along Boulder Creek. Therefore, we believe that this proposed action needs additional site specific analysis to understand impacts to sensitive species, management indicator species, water quality, visual impacts and possibly other items. As a nearby landowner, we do not believe we received any notice of this proposed action.

#### Tule Springs Area

We support the proposed actions.

#### Boulder and Cedar Creek Areas

We support the proposed actions

#### Anderson Valley Capitan Grande Indian Reservations

We do not support the closing of trails associated with the Anderson Truck Trail. As an adjacent land owner, a section of the trail crosses our property. We support the continued use of the trail near our property. This section has been used for many years as a non-motorized trail and provides incredible outdoor recreation opportunities. This trail also provides irreplaceable scenic vistas. We request that UND 314, 324, 313, 314-0.44L-1 be removed from the actions list. We do not have a position on the other actions proposed on this map. We recommend that user groups be engaged to improve these trails to address any earthwork and restoration needs.

The supportive comments are appreciated. Regarding the El Cajon Mountain area, see response to comment 65. Regarding the Cedar Creek area and 13S06-5.2R1, Alternative 2 only proposes to reinforce existing barriers to prevent entry by motorized vehicles. This work would not preclude

---

future consideration of the route as a non-motorized trail. Regarding the Boulder Creek Road area, the proposal to add UND114 as a public road has been withdrawn from Alternative 2 due to resource concerns and engineering constraints. Regarding the Anderson Valley area, see response to comment 67.

#### 97) Anderson-Capitan Grande Area

The route you have identified as UND314 is also known as Anderson Truck Trail (ATT), and it has been identified on every topo map I have seen as Forest Route 15S30. While it does not appear on the Motor Vehicle Use Map, it has always been my understanding that the section of ATT below Four Corners (intersection of UND314 and UND8294/8296) is a non-motorized system trail. It is heavily used by mountain bikers and has been for 30 years. It would be a huge loss to our community to have it decommissioned.

If it is correct that it is currently an unauthorized route, then the correct action would be to add it to the system as a non-motorized trail. Issues with erosion could be dealt with via maintenance. This is something the community of mountain bikers could assist with. ATT offers one of the best views from a bike trail in San Diego and is a popular trail to both climb and descend. If this gem is lost I would be very concerned that unauthorized trails would pop up elsewhere because there are very few trails such as this in San Diego County. I would like to know how the Forest Service would replace this lost recreational opportunity. Where does it think all the riders are going to go?

I will be happy to see barricades go up to prevent future OHV incursions down ATT. Numerous 4x4s have rolled over the side in recent years, so this trail is obviously not safe for them. However, it is an excellent bike and hiking trail and I ask that it be added to the system as a non-motorized trail.

See response to comment 67. For these reasons and because the abandoned portion of Anderson Truck Trail is not a designated trail, its decommissioning would not be considered a lost recreational opportunity.

#### 98) El Cajon Mountain Area

I understand that SDGE recently purchased the ranch up top in the El Cajon Mountain Area as mitigation for Sunrise Powerlink and that it has been added to Cleveland National Forest. The area up top offers amazing potential for a trail network underneath mature oak trees and with great views over El Cap reservoir. It is disappointing to see all routes except for West Side Road proposed for decommissioning. By closing all of these routes it will be a free-for-all once the public discovers this area, as there is nothing to stop users from going where they want across the meadows and open areas. A sensible trail system would take them to the best viewpoints and desirable areas and help keep them out of sensitive habitat.

I hope that the Forest Service will do a proper assessment of the trails and routes before decommissioning any. Surely some of these are suitable for recreation? If not what does the Forest Service plan to do to provide for recreation up top there? A single road through to Ramona is excellent as a connector but completely inadequate with respect to trail users'

---

needs. I would suggest bringing two loops into the system for now as non-motorized trails - 13S10-15.72L1 and UND-784, plus a second loop using 13S10-17.03L2 and UND-8139.

See response to comment 65.

99) Pine Creek Area

The EA proposes to decommission route 14S05D – Extension. I explored this route a few years ago as a connector from Pine Creek Road to Noble Canyon National Recreation Trail. While this is not a great route at present, it offers excellent potential for creation of a short loop utilizing lower Noble Canyon. This would be perfect for hikers and equestrians who cannot to the full distance of Noble. And it would also be great for mountain bikers when conditions up at Mount Laguna are not favorable or they just want a shorter ride. Please change the proposed treatment for this trail to proposed as a non-motorized trail.

These lands are open to non-motorized public use, and recreational trails could be considered in this area but would be challenging due to lack of a parking area and a confusing start to the trail. Damage caused by vehicle use would be addressed by Alternative 2, and the work would not preclude future trail establishment.

100) I can understand the reasons to close the routes proposed for decommissioning, however their closure eliminates what may be the last possible dirt route for mountain bikers to get from Pine Valley to Chula Vista south of Interstate 8. For over a year I explored various routes but all of them are either blocked by Wilderness or blocked by private property. The maps provided in the EA and scoping do not provide sufficient information to assess the impact of closure on connectivity. However, looking at the Border Patrol comments it appears that there is potential for a long-distance connection to the west of Barrett Reservoir. For that reason I would ask the Forest Service to remove 17S08 and 17S12 from the list of routes proposed for decommissioning until their potential for connectivity can be assessed.

These lands are open to non-motorized public use, and recreational trails could be considered in this area but would be challenging due to the fact that this part of the Cleveland National Forest (east of Barrett Reservoir) is very difficult for the public to access because of private land ownership. Damage caused by vehicle use would be addressed by Alternative 2, and the work would not preclude future trail establishment.

101) In Summary I support Alternative 2 with the modifications described above. We need more non-motorized trails in the Cleveland National Forest! While I understand discussion of new trails is outside the scope of this project, making the changes above would be a great start.

This supportive comment is appreciated. See responses to comments 97 through 100.

102) Upon learning that that the private property up on top of this mesa had come into the Cleveland National Forest we were excited about the opportunity for recreational trails. The area is absolutely beautiful with mature oak trees and meadows, something we are sorely missing since the large fires in the 2000's. There is also potential for access to incredible views over El Capitan Reservoir. We recognizes that creation of new trails is outside of the

---

scope of this project, however, we were quite dismayed to see that every route except for the main West Side Road 13S10 is proposed for decommissioning. All of these routes are old double-track roads, but some would make excellent trails. Considering the recent addition to National Forest Lands, what process has the Forest Service undertaken to evaluate recreational opportunities for this area?

We are appreciative of the fact that we will hopefully gain access to a legal dirt route from El Monte Road to Ramona. However, we feel that an exceptional recreational opportunity is being lost with the proposed decommissioning of routes in this area. We ask the Forest Service to precisely define what the impacted resource categories are and to precisely define the purpose and need to close these routes.

Once trail users learn of this area they will want to visit it. Given the open nature of the landscape, there is nothing to prevent users from going cross-country, which will eventually lead to creation of new unauthorized routes. We strongly recommend that the Forest Service leave a number of routes in place as non-motorized trails to create a sensible loop or two for users to access. Creating a sensible loop will give users a destination and hopefully keep them on that route rather than damage resources by going off-route.

Once the area can be fully assessed for future trails, the existing routes can then be decommissioned if appropriate, once a trail system is designed. It is our understanding that the San Diego River Park Foundation is interested in a connecting trail from its land up on El Cajon Mountain down to this area. SDMBA looks forward to working with the Forest Service to identify such opportunities for singletrack trails in this area.

For now we ask that the following routes be removed from the list of routes proposed for decommissioning and instead be added as non-motorized trails in order to preserve two loop routes for public use:

- 1) 13S10-15.72L1 and UND-784
- 2) 13S10-17.03L2 and UND-8139

See response to comment 65. The Forest Service has not undertaken a process to evaluate recreational opportunities in this area, which falls outside the scope of this project. As for the particular resource issues in this area, soil erosion and wildlife habitat are the primary issues associated with these unauthorized routes. The project record provides more detailed information than is included in the EA about the particular issues and is available for public review upon request.

- 103) SDMBA is mainly concerned about the potential for future long-distance biking when considering the proposed decommissioning of routes in the Hauser Wilderness area. To our knowledge, all non-pavement routes between Pine Valley or Corral Canyon and San Diego south of Interstate 8 are blocked by Wilderness (Secret Canyon / Espinosa Trail) or by private property (Skye Valley Road and Horsethief Road from Descanso). The only potential area left for such a connection is south of Hauser Canyon and Barrett Reservoir, connecting to Mother Grundy Truck Trail or another legal route.

The proposed decommissioning of 17S08 and 17S12 therefore are of concern to us because these represent the only potential east-west connector left south of I-8. While the EA states

---

that “ A passable road through private lands connects to both of its ends, and so [South Boundary Road] is not needed” this is of little benefit to the public because we generally do not have the luxury of passing through private property to access a public route. Therefore, it is important to maintain public non-motorized access to routes such as South Boundary Road and 17S12. At minimum we ask the Forest Service to assess the potential connectivity to the west prior to decommissioning 17S08 and 17S12. An East-West connector south of I-8 is very important to long-distance trail users. Should these two routes not complete such a connector, SDMBA would very much like to work with the Forest Service outside of this project to assess how such a connection could be made.

See response to comment 100.

104) The route 14S05D – Extension has been proposed for decommissioning. SDMBA asks the Forest Service to precisely define what the impacted resource categories are and to precisely define the purpose and need to close this route. We acknowledge that it is seldom used by trail users. However, it would create an excellent short lower elevation loop with Noble Canyon Trail if it were maintained as a non-motorized trail, and does offer some great views which are not available from Noble Canyon Trail. A shorter loop would be excellent for hikers and equestrians as well and would help to disperse use. SDMBA asks that the Forest Service remove 14S05D-Extension from the list of trails to decommission and instead bring it into the system as a non-motorized trail.

See response to comment 99.

105) Anderson Truck Trail, identified on the project map as UND314 is a heavily used and loved mountain bike route. It has been so since the early 1990's, and no doubt saw use even before that period. It is identified on old topo maps as Forest Route 15S30 and is generally regarded as an authorized route down to where it intersects private property above Peutz Valley Road.

We are puzzled why it is now identified as an unauthorized route. In fact, the project map comes from the same topographical map that many of us use, and the edge of the box for the “15S30” label can just be seen under the E that is only partially visible to the right of the UND314-0.44L-1 label. See the attached map excerpt from our Topo Maps. How is it that this route is now considered unauthorized?

Given the longstanding recreational use of this route we do not feel it is appropriate to decommission it. Instead, it should be added to the system and designated as a non-motorized trail. There are unauthorized trails above Four Corners which many riders have been using. However those are mostly on Tribal Land, which has recently been fenced off. The section of Anderson Truck Trail up to Four Corners is a valuable route that riders will want to continue using. It offers spectacular views over El Capitan Reservoir and is long enough in distance to be a worthwhile bike ride or hike.

The scoping map identified route UND314 as having two impacted resource categories. We believe that one of them is erosion, as the route has become eroded over time. However, for continued use as a non-motorized trail the erosion issues could easily be addressed. The San Diego Mountain Biking Association has worked with the Forest Service on many trails such

---

as Noble Canyon to address erosion issues. We also work closely with the San Diego River Park Foundation, who now owns numerous parcels at the bottom of Anderson Truck Trail. We do not expect any opposition from them in terms of continued access from the bottom and would like to work with both them and the Forest Service to bring ATT / UND314 into the system as an authorized trail.

There is insufficient information in the documents for SDMBA to fully respond to the EA. While we expect erosion may be one of the impacted resource categories we do not know what the other impacted resource category might be. We ask the Forest Service to precisely define what the impacted resource categories are and to precisely define the purpose and need to close this well-loved and heavily used route.

We also ask the Forest Service how they will mitigate this loss of recreational opportunity. In both the main EA document and responses to scoping comments we have seen the statement that decommissioning of an unauthorized route does not constitute a loss of recreational opportunity because use of the route was never authorized to begin with. As a technical answer that may work, but in reality where are the hundreds of mountain bikers who use this route going to go? ATT is prized as a descent and there are few similar routes in San Diego County, and even fewer yet which are authorized. We are concerned that the closure of this route will push the problem of unauthorized routes elsewhere in the CNF. Losing this route will not change demand, and unfortunately users may build unauthorized routes elsewhere to replace ATT.

We agree that it should be closed to motorized vehicles, because the trail is not wide enough to accommodate 4-wheeled OHVs, and given the high usage by mountain bikers it is not appropriate for motorcycles.

We ask that the Forest Service remove UND-314 from the list of routes proposed for decommissioning and add it to the list to be brought into the system as a non-motorized trail.

See responses to comments 67 and 97. In addition, Alternative 2 would add 4.4 miles of non-motorized trails elsewhere on the Cleveland National Forest. In addition to causing severe erosion, UND314 crosses a Riparian Conservation Area and falls within critical habitat for the threatened California gnatcatcher. Additional information is available in the project record.

106) I am the Capitol Director for Assemblyman Brian W. Jones, who is an avid off-highway vehicle enthusiast. He has asked that I provide this public comment. I would add that a formal letter from him will follow and that this office will continue to closely follow the activities of the National Forest Service in the Cleveland National Forest and elsewhere in the 71st Assembly District.

Off Highway Vehicle enthusiasts pay fees to the OHV fund for the purpose of enhancing opportunities to enjoy their chosen recreational activities with their off-highway vehicles. It seems impossible to reconcile that purpose with the closure of trails and roads. It is interesting that the Forest Service would choose to use the word “decommission” when describing this project. That word implies that these routes were once commissioned. So, the phrase “decommission unauthorized routes” looks like an oxymoron. It would be appreciated

---

if the Forest Service would at least own up to the actual purpose of this project through the use of the word “closure” in place of the word “decommission.”

I understand that the entire OHV grant program will sunset on January 1, 2018 unless there is a state law enacted to extend or remove that date from the Public Resources Code. Our office will take a long, hard look at that process with the goal of limiting the use of OHV funds in the manner described in this current project.

See responses to comments 1 and 7. Road decommissioning is defined by the Forest Service as: “Activities that result in the stabilization and restoration of unneeded roads to a more natural state.” (36 CFR 212.1) For this project, the term was used to convey the return to natural condition that other terms, such as restoration, might not. While some of the unauthorized routes proposed for decommissioning were likely commissioned at some time in the past, previous decisions have rendered them as unauthorized routes, with the exception of the two unneeded National Forest System Roads included in Alternative 2. See Chapter 1 of the EA for further background.

107) The concept of unauthorized route decommissioning is, in theory, a perfectly valid and reasonable pursuit. Unfortunately, the maps showing the routes to be decommissioned do not match the textual description of the stated objectives. Those objectives are described as "OHV related facilities maintenance, signage, wildlife and cultural resource protection, restoration of unauthorized motor vehicle routes, and law enforcement support." However, the maps depict many red-hilited (to be decommissioned) forest routes which are perfectly valid routes of travel. In other words, the description does not match the content. Until this is corrected, I recommend that this plan be tabled. The documents put out for public review are ambiguous, erroneous, and conflicting.

The quote provided was excerpted from the press release available on the project website that announced the Cleveland National Forest’s 2014 pursuit of grant funding from the California OHV Division. Several applications were submitted for operations and maintenance of OHV areas, law enforcement, and restoration activities. This EA was partially funded by the restoration grant in particular, while other grants funded the other types of activities. No State grant funds are being used for decommissioning designated roads or trails on the Cleveland National Forest.

### **Carveacre Road**

108) I am writing to comment on the Cleveland National Forest Route Decommissioning Project currently taking place on Behalf of the San Diego Off-Road Coalition and the California Off-Road Vehicle Association. I would like to thank the forest for allowing the public to comment on this project. There are a variety of user made routes the forest has identified on the ground that are not in the forest inventory. I saw these in the scoping phase of this project. In addition to those routes, I have noticed that, while not in the scoping document, the forest has included Carveacre Road to be decommissioned in the draft document. I would like to focus my comments to Carveacre Road.

Carveacre Road is a road much loved by a variety of outdoor enthusiasts, including off-roaders in 4X4's and on motorcycles, rock climbers, hikers, hunters, sightseers, mountain bikers, etc. A local 4X4 club named the large flat rock at the top "Pancake Rock" because they have held their annual pancake breakfast there for decades. News of the city closing the

---

bottom portion of the trail and locking the gate has sent shockwaves around local outdoors people. I have personally heard about it from a number of people. I, and the people I represent, very much would like to have this route reopened. We believe that it is easily within the forest's power to do so with minimal impact. I have been told that this action may be linked to concerns over water quality. It is hard to imagine that after decades of this trail being open, now it is causing more problems than it is worth. If water quality is a major concern, there are management techniques that can minimize the impacts of the road. Dirt roads are not new and the management techniques to minimize silt runoff are straightforward. I won't list the techniques, but I know of a number of them that have not been applied to Carevacre Road. We firmly believe that it is in the public's best interest to manage this route as open rather than to simply close it.

The decommissioning of Carveacre Road was indeed added to this project after scoping, because its proposed action and resource issues are very similar to many unauthorized routes across the Cleveland National Forest. It is acknowledged in the Recreation and Public Safety section of the EA that recreational opportunity would be lost for some current users of Carveacre Road. Water quality is one of several issues as described on p. 6: "It is severely eroding and impacting sensitive biological resource areas, and its use presents unacceptable fire hazards and safety risks."

- 109) We respectfully request that your analysis recognize the recreational importance and extensive usage history of Carveacre Road which dates back many decades, and we hope to see Carveacre Road become recognized as an "official" route in the Cleveland National Forest.

It is acknowledged that Carveacre Road has a long history of public use, and it has been an "official" road but would be decommissioned by Alternative 2.

- 110) If, however the plan to close Carveacre road moves forward, how does CNF plan to mitigate the loss of the recreational opportunities resulting from the closure to ensure that my constituents' opportunities to enjoy their public lands are not diminished?

Alternative 2 would add 6 routes to the National Forest Road Road or Trail Systems for motorized use by the public, totaling 1 mile in length. While these additions may not provide the level of recreational opportunity sought by current users of Carveacre, they can provide for use without unacceptable impacts or risks. As described in the Recreation and Public Safety section on pp. 44-45, the project will result in other recreational benefits as well, and so it is not clear that mitigation is warranted for this loss.

- 111) Pancake rock is a great trail that provides recreational opportunities for many families. It is one of the closest places to San Diego for off roading... It would be a shame to see it closed permanently. I understand there are people that abuse the privilege of using our public lands, but the majority of people that use it are law abiding people that work to keep our public lands clean, open and nice for others to enjoy for generations. It seems that throughout the years more and more public land is being closed to access. When I was a kid there was a ton of places to off road all over Southern California. Now most of those places are developed or closed. This only creates more people attempting to off road in areas they are not allowed to. I would like to see areas open for responsible off roaders to enjoy their hobby. If this means it

---

needs to become a fee area to keep vagrants out and help keep the area open, then maybe that's what should happen. I do not think any responsible off roader would object to a reasonable fee to keep an area open.

See responses to comments 3 and 108. Carveacre Road would need facilities to become a fee area, which it lacks. It is true that irresponsible riders can limit the opportunities for other users, and so rider education and enforcement are important investments in addition to restoration.

112) I just wanted to respond to your proposal on Pancake Trail. I've been taking my family up that road for years, and the kids really love playing on the rocks up there, and I think it would be a shame to close that trail. I have noticed, as I guess you guys have, the last couple years there have been some side trails cut. But what I have seen other forest areas do on those is put up posts and signs that say "stay on the main trail." Obviously I belong to a Jeep club, and I know a lot of people that use that trail belong to Jeep clubs. And it's probably 1% of the people going up there that are doing that. I know you need to address that problem, but I don't think it's fair to the other 99% to close a recreational area, especially something that's so close to the city where we don't have to waste a lot of gas and effort getting to and cause more air pollution by having to drive 100 or 150 miles.

I think if you guys could put up posts so that people couldn't cut those trails, that would substantially cut down on these people that shouldn't be doing that. Obviously our Jeep clubs do contribute to the community, we do work with the BLM and different forest areas on keeping trails open. And maybe something like that can be worked out, where we could patrol that a little bit more and report people that are violating the rules, either taking pictures of their license plates or their vehicle and their license plates, and then you guys follow up with them and give them a citation or whatever you normally do. Like I said, I go up there, my family goes up there, we go up with other families. And for kids those rock formations are a really fun place for them to play with and obviously kind of unique in that area. So I hope you'd consider our proposal not to make any changes to that and maybe block off the side trails a little bit with signs that say "stay on the main trail."

My other thought was that it's probably 1/2 of 1% of people who are cutting these trails; people that are probably teenagers and people that have been drinking, and unfortunately it's such a small group of people that are affecting the other 99 1/2 % that are following the rules. I've been a member of the Sierra Club for at least 40 years, and now that I'm getting older, I can't do the backpacking or hiking that I used to do, so my main source of getting to some of these trails and interesting spots is 4-wheel off-roading.

See responses to comments 108 and 111. The offer of support is appreciated, and the Cleveland National Forest acknowledges the uniqueness of the area accessed by Carveacre Road. It should be noted that eliminating the exploratory driving along Carveacre Road would not alleviate many of the impacts and issues described in Alternative 2.

113) Please consider keeping the Pancake Rock Trail in the Alpine/Jamul area open for the future. This trail covers an amazing area and is a wonderful resource for local residents with off-road capable, street legal vehicles. My children, ages 8, 6, and 3 and I adore the journey up to the incredible granite topped area as well as the challenges that the dirt trail offers along

---

the way. We were all extremely disappointed to discover that this trail had been closed. I know that the San Diego Off-Road Coalition has offered to sponsor this trail and assist in its upkeep, to reduce any burden that keeping this trail open and accessible to the public would create. Please consider keeping this trail open so that responsible citizens and off-roaders can continue to enjoy the area. My family and I would love to continue visiting it.

See responses to comments 108, 111, and 112.

- 114) Carveacre Road was built and maintained by the Forest Service and should not be considered an “unauthorized route”. It is, in fact, a poorly maintained fire road that has been open to the public for decades. Road closures, such as Bear Valley and Kitchen Creek, have caused Carveacre Road to become the preferred off-road recreation destination for many in the San Diego area. Closure would be a tremendous loss to organized off road recreation.

There are workable alternatives to decommissioning Carveacre Road and the permanent loss of a valued recreation destination. On behalf of the members of the San Diego 4 Wheelers, we encourage reconsideration in this proposed decommissioning.

See responses to comments 108, 111, and 112. Carveacre Road is currently a National Forest System Road, not an unauthorized route, that would be decommissioned by Alternative 2.

- 115) The forest has created two alternatives to this proposed action. Neither alternative describes the course of action the forest should take. At scoping the forest identified a number of user made routes that are not in the current inventory. Now at the draft point of the EA, the closing of Carveacre Road is added to the list. There are a number of routes that I will not argue should be closed, but closing Carveacre Road is a big mistake. There should be a third alternative that has the actions shown in the scoping phase of this EA, but not the Carveacre Road closure. If one must "vote" for the alternative that that is most appropriate, then I say the forest must go with the no action alternative. The routes that are illegal will still be illegal and the forest may enforce existing rules to suppress illegal activity.

When the restoration grant for the state was awarded to the forest for this action, there was no mention of closing Carveacre Road. If it was, I would have commented then about the negative effects of closing this route. I feel as though the forest has pulled a fast one on users.

See responses to comments 107 and 108. The third alternative requested is unnecessary, because the No Action alternative has been analyzed and could be selected for Carveacre Road, while Alternative 2 could be selected for other routes.

- 116) Just a few years ago the CNF went through the process of Travel Management and then determined that Carveacre Road was acceptable to keep open. What exactly has changed since then? Nowhere in the purpose and need section does the forest describe the need to close Carevacre Road. Water quality? There are well known road building and maintaining management practices to minimize sediment runoff that can be implemented. Where does the water even go? Barret Lake? Barret Lake is on the other side of Lions Valley Road. I don't know how the water would get there.

---

The EA says Carveacre Road is impacting sensitive biological resource areas. This is just an excuse to justify closing the road. Now its effecting sensitive biological resources? Has this been happening for the last 50 years without the forest knowing? Is this an admission that the Forest's Travel Management plan a few years ago was faulty? I participated in Travel Management then and never heard a word about Carevacre Road.

See response to comment 108. It is true that Carveacre Road was retained through the Travel Management process that was finalized in 2008. Since then, its condition has deteriorated to the degree that existing problems grew worse. The water in the area does indeed drain to Barrett Reservoir, despite that it must cross Lyons Valley Road. The Purpose and Need section includes the following sentence: "A secondary purpose is to make minor adjustments to the National Forest Road and Trail Systems that are needed to provide for public or administrative access or to prevent resource impacts and safety issues."

117) The EA says this road creates a fire hazard. Has there been fires caused by this road? How can this road cause a fire? Are you saying a user could go up there and cause a fire? If this is the case, that same user could go on any number of legal forest routes and cause the same fire. This argument is severely flawed. The EA also says this road is a safety risk. How so? Because it is too rough? Smooth it out a little then. Put a sign at the beginning saying "Don't proceed if you are not experienced and well equipped."

Not only could a user start a fire either through a dispersed campfire or through scraping of metal on rocks, Carveacre Road is not passable by a fire engine that would otherwise respond to a fire. In this respect, it is similar to the unauthorized routes, as described in response to comment 58. These conditions present safety risks due to fire, as well as due to the likelihood of vehicle accidents and the inability of emergency vehicles to travel the road.

118) Table one says that this action will add 1.2 miles of route for public use. It doesn't say if this is motorized or not. If it is, it is a far cry from mitigating the loss of Carveacre Road. Carveacre is challenging and leads to a spectacular view. The others are short and boring. In no way does the 1.2 miles add up to what is lost by closing Carveacre Road.

See response to comment 110. As described on p. 5, "Add for Public Use' refers to incorporating a route into the National Forest Road System for public use, with the exception of a single route off Bear Valley Road that would become a motorized, 50-inch-wide National Forest System Trail." This value was adjusted downward from 1.2 to 1.0 due to the removal of UND114 from the additions, as described below. A spectacular view is available from the motorized trail that would be added via Alternative 2, and it will be challenging, but we are not able to provide the level of challenge currently present on Carveacre Road because of the resultant impacts and risks.

119) Section 4 of the EA describes persons, groups, organizations and agencies consulted during the development of this EA. I notice the San Diego Off-Road Coalition is absent from this list, even though it participated in Travel Management and the scoping of this EA and will experience a direct negative effect of the preferred action. SDORC has had CNF personnel speak at their meetings many times over the years. Why was SDORC not consulted?

---

The San Diego Off-Road Coalition was provided the same level of opportunity to provide input into this project as all other non-governmental organizations and individuals.

120) The forest response to comments about the closing of Carveacre Road reads like it is rationalizing this action after it has already decided to close it. Safety, fire and biological sound reasonable, but didn't cause it to be closed during Travel Management and don't add up to justify closing it now. If the cost of managing is too high, come to SDORC to get help with obtaining grants. The practice of management by closure is infuriating to users. The forest needs to manage the forest for the users, not from the users.

See response to comment 116. The offer of support is appreciated.

121) Just wanting to drop a note to let you guys know that as Jeep enthusiasts, we are committed to protecting and preserving natural habitats for future generations, as well as enjoying traveling through them in our vehicles. My kids have grown up on Carvacre, although they know it as Pancake Rock. We hike, we drive, and we play in these rocks and yes, we've cleaned up several times after others who do not. We've cleaned up trash and other things from up there. But the point is, that the responsible use of the area far outweighs the irresponsible use from other people, and we would like to continue to have the use of it for future generations.

Route closures don't help, because there will always be a portion of the population who will disobey the rules and go in anyway, and make things worse. The proper plan is to enlist the help of people who have a vested interest in these areas - the local clubs - and get THEM to be responsible for these areas' upkeep. By doing this, peer pressure from other club members helps to keep the people who are less responsible in line, and also gives you "feet on the ground" to be your eyes and ears. The clubs also are tasked with the cleanup for what happens out there, AKA "Trail clean-up days," and can make a great day out of maintaining the trails. This takes away from the time and money that the government has to spend on the trail as well, allowing it to be spent elsewhere. IT WORKS. It's worked before in other areas, and it will work here too, but only if YOU become willing to let us try it.

At the very least, let's begin with a trial period for the process, so that our local clubs can have the opportunity to show what they are capable of, and when it works we can make it a longer-term agreement.

Our San Diego OHV clubs are committed to working with the government to keep these areas open, if you'll make the time to work with us. I am hopeful that we can all work together to maintain our open areas, so that they can be enjoyed for generations to come.

See responses to comments 108, 111, and 112.

122) Tell the forest that this road has significant recreational value. Ask how the forest will mitigate this loss of recreational opportunity if they must close it. Ask the forest to precisely define the purpose and need to close this well-loved route.

See responses to comments 108 and 110.

123) Allied Climbers of San Diego is a member-based non-profit organization dedicated to promoting and maintaining access to climbing and outdoor recreation. We pride ourselves in our environmental stewardship, while striving to appropriately balance preservation with responsible recreation.

Our understanding is that this project includes the proposed decommissioning of Carveacre Road which provides the primary access route to Lawson Peak. Lawson Peak is a long-standing hiking and climbing destination which can be found in the Jerry Schad "Afoot and Afield in San Diego" guides and the Dave Kennedy "San Diego County Climbing Guide. Both of these guides point to Carveacre Road as the access route to this area. The rock formations on and around the mountain are home to numerous documented rock climbing routes. Reference <http://www.mountainproject.com/v/lawson-peak/106373016> and the "San Diego County Climbing Guide" for additional information.

Though currently only suitable for high-clearance 4wd motor vehicles, the road also serves as a multi-use hiking and mountain-bike trail providing a route through the dense brush. It is difficult to understand how the Forest Service considers this to be an "Unauthorized Route" with the road identified by name on USGS and Forest Service topographic maps, including some dating back to before 1945.

Based on the historical and current usage of Carveacre Road and the lack of alternatives providing access to the area, Allied Climbers of San Diego requests that the Cleveland National Forest remove Carveacre Road from this route decommissioning proposal.

See responses to comments 108 and 114. The area would remain open to non-motorized use under Alternative 2.

124) After I moved here I found that the off road community was one of the best. Amazing and passionate people. As soon as I began getting involved pancake rock was one of the first places to come up. How amazing the trail is, beautiful views, and so on. But before I was able to enjoy the trail I learn that it was closed. It such a sad thing to take away trails. There are so many amazing things about this city and off roading is one of them. When you close trail it effects more then just the 4 wheeler's. it effect the economy. Off road shops, the local business around the trail and so forth. Their are several organizations that are will to do what is necessary to preserve these trails. Lets work together with the community and keep these trails open!!!

The Forest Service does not anticipate a measurable economic effect of Alternative 2, given the number of legitimate motorized recreation opportunities across Southern California.

125) Please keep the dirt road called Carveacre Road open from Lions Valley Road to Pancake Rock and the top of Mount Lawson. Please create a new connection from Lions Valley Rd the bottom of the route. This road has significant recreational value.

---

See response to comment 108. It is beyond the scope of this project to build a new road connection. Moreover, the need to address the resource impacts and safety concerns of the rest of the road would remain.

- 126) It is possible that cost is another reason the forest does not want to keep this trail open. There is a cost to maintaining this trail and it may be more than the forest can afford. If this is the case, grants are available from a number of sources to build and maintain off-road vehicle routes. I can personally think of five sources of grants available for projects such as saving Carveacre Road. The San Diego Off-Road Coalition would be thrilled at the opportunity to partner with the forest and apply for such grants. SDORC has successfully received grants in the past and is ready to help again.

See response to comment 108. This offer of assistance is appreciated but would not alleviate all of the issues associated with Carveacre Road.

- 127) It may be that part of the reason the forest wants to close Carevacre Road (and other areas) is to prevent people from doing bad thing up there. We believe that bad people will do bad things and if this is closed, they will continue to do the same and go somewhere else to do them. The good people who enjoy this route should not have to suffer because of a few bad people. The forest should have more and better signs in areas deemed to be problem areas. The forest should remind users of the rules and let them know motion sensor cameras are active in the area and bad people will be caught. (Think hunter's game camers)

See responses to comments 111 and 112.

- 128) The draft document on this project states that the forest maintains contact with off-road groups. Such recent contacts with our off-road organization has only come about by my personal efforts. The forest has not not come forward to discuss this project with SDORC (or CORVA). If there are any off-road leaders in San Diego who should have been contacted to work with the forest on this or other projects, I believe I would have been on this very short list.

See response to comment 119. The Forest Service does maintain contact with off-road groups, including the San Diego Off-Road Coalition.

- 129) I understand that the city of San Diego has locked the gate at the bottom of Carvacre Road and owns a small portion of the beginning of the route. This is a great opportunity for the forest to create a new section of road to connect Lions Valley Road to the forest's route to the south of the existing entrance on forest land. This would allow the forest to control the complete length of the route. If the grade is considered too steep for a dirt road, the forest should consider paving that small portion.

See response to comment 125.

- 130) If the forest decides to go against the wishes of so many of the forest's users and goes forward with closing Carveacre Road, the forest must mitigate the loss of recreation in both distance and quality of route. Carveacre Road takes users to a point with a spectacular view.

---

Such a replacement route should offer an equivalent view. Carveacre Road also offers a challenging route. Such a mitigation route should be equally challenging.

See responses to comments 110 and 118.

131) There is significant joy in exploring back county routes. There are precious few of these still legally open in east San Diego County. To close one simply because it is "easier" to manage is contrary to the forest's mission and a slap in the face to outdoor recreationalists who enjoy getting "out there" to experience the world. The forest should not only maintain Carveacre Road as open, it should find a way to make it either a loop or part of a longer point to point route.

Please do all you can to keep this important route open for forest users to enjoy, not close it because it is more convenient.

See response to comment 108. Carveacre Road is not proposed for decommissioning due to ease or convenience. It is beyond the scope of this project to construct a new road loop or longer point to point route.

132) Carveacre Area

I am disappointed with the proposal to decommission road 16S03 up to Lawson Peak. I have ridden up there a number of times. The road is challenging to climb on a bike but offers incredible views and a unique scramble to the summit of Lawson. Access to 16S03 from the other end at the top appears to be blocked by private property and no trespassing signs. Aside from Corral Canyon there are very few opportunities for bikes on CNF south of Interstate 8 so this would be a big loss for us.

16S03 should remain open as a non-motorized route. Ending motorized use would significantly decrease future erosion, and erosion from the existing condition of the road can be addressed with the same mechanical equipment that would be used to decommission and re-contour the road, or possibly even by hand.

16S03 being an authorized route puts it out of the scope of this project and I object to its closure. Please change the treatment to designating it as a non-motorized route.

See the responses to comments 108, 116, and 123. Resource concerns would persist if Carveacre Road became a designated non-motorized trail, and new parking safety concerns would be created along Lyons Valley Road on lands owned by the City of San Diego. For these reasons, this proposal is considered infeasible.

133) Our club has enjoyed the Carveacre Rd area for 20+ years and we hold an annual "Pancakes on the Rock" event one a year. This coming May would have been our 20th year doing this event. We get a lot of young families and "new to wheeling" folks at this event which is a perfect time to educate them on proper off road etiquette.

---

While we fully understand that there are issues in the area with unauthorized usage and abuse, those folks are fewer in number than the responsible users of this area. There are workable alternatives to decommissioning Carveacre Road and the permanent loss of a valued recreation destination. An alternative would be to allow use of the trail via a permit issued to organizations that will use the area responsibly.

See responses to comments 111 and 112. The educational efforts are appreciated. A special use permit application could be submitted for this use, but the resource concerns and safety risks of Carveacre Road would remain an issue.

- 134) Our main concern in this area is the proposed decommissioning of 16S03 which provides public access to Lawson Peak. This route is used by both hikers and mountain bikers in addition to the OHVs which seem to be of primary concern for the Forest Service. We ask the Forest Service to precisely define what the impacted resource categories are and to precisely define the purpose and need to close this route.

SDMBA is concerned about the loss of access to this route because there are very few routes open to mountain bikes in this part of CNF given the large area taken up by the Hauser Wilderness and Pine Creek Wilderness. Lawson Peak offers incredible views and all other access to our knowledge is blocked by private property. How will the Forest Service mitigate this loss of access for mountain bikers? This is also an important hiking route, and Lawson Peak is a hallmark route as described in Jerry Schad's Afoot and Afield in San Diego which requires climbing through a unique chimney to access the summit.

Responses to comments from the scoping period suggest that closure of this route for motorized uses will not preclude primitive access for hikers. It is SDMBA's strong belief that the issues regarding erosion can be mitigated well enough to maintain this route as a non-motorized trail. This could include contouring with machinery to convert it to singletrack. Non-motorized use was not identified as a fire hazard or safety risk, and if primitive access is still allowed then users should have a trail that they can follow for safety and so that more unauthorized routes are not created.

We should also point out that the subject of this project is the decommissioning of unauthorized routes. Since 16S03 is an authorized route, its inclusion for decommissioning is outside the scope of this project. SDMBA asks that the Forest Service remove 16S03 from the list of proposed routes to decommission and instead add it to the list of non-motorized routes within the system.

See responses to comments 108, 110, 116, and 132. In addition, Alternative 2 would add 4.4 miles of non-motorized trails elsewhere on the Cleveland National Forest.

- 135) Carveacre Rd in Lyons Valley is of particular concern for me as a climber. This trail is used to access Lawson Peak for several different types of recreation, including rock climbing. I would prefer that the CNF maintain access to Lawson Pk that is driveable with a typical stock 4x4 vehicle. Isn't there an easement to access this road? If not the CNF may need to create a new connection from Lyons Valley Rd to this area. How the forest will mitigate this loss of recreational opportunity if it is closed?

See responses to comments 108, 110, 123, 125, and 134.

136) Additionally I would fully agree with the off-road coalition on one very important area in particular. I wrote in about this before I knew the comment period was to be delayed or had pieced together that the opening of Boulder Creek was much bigger than originally planned.

The much beloved late Jerry Shad, of the hiking community, published decades ago, an outing to Lawson Peak in “the Bible” of San Diego Hiking, *A Foot and a Field in San Diego County*.

Lawson Peak has enjoyed visitation by a wide variety of recreationalists, including the off-road Pan Cake Mother’s Day breakfast. The climb to the top of Lawson Peak is a most unusual and rewarding one. The City does not want to allow access along the first ¼ mile of this road off of Lyons Valley Road. I can support an alternate route from the FS access lands to the south and the modernizing and grading of this access road. Additionally this and all backcountry routes with environmental issues need gates and proper signage as well and ongoing rangers to educate the public. Many of these get closed that never had signage stating to the contrary in the first place. The damage is done but then they are closed and the damage moves to another location. I am providing more specifics in the list below. I am suggesting that rather than close this road entirely the USFS develops a new spur coming in from the south that will bypass the existing one on City property. In that way they can maintain full control over this route. It would provide a 2nd exit from the community of Carveacre albeit a high clearance one, and access for Fire fighters. I also am suggesting that the first spur is a paved one, to a pad on the ridge above the end of City property is used as a full public overlook so that all can have a piece of this experience. I was in this area for a couple of hours looking at this possibility and created a video with some of my thoughts on this. I’d like to add this to these comments:

<https://youtu.be/gA5gHn3i1UA>

I’m adding a picture of the USGS topo map with some potential routes as well and will follow this letter with more photos of this and the other issues.

1. The Sierra Club’s own hero, the late Jerry Shad, wrote about Lawsen Peak in his *Foot and a Field in San Diego*, the universally accepted bible of San Diego back country hiking. Lawsen Peak and Gaskill Peak on the same ridge has been a favorite destination of hikers, off-roaders, climbers, and bicyclists for several decades without issue.
2. While Gaskill Peak is a diverse ridge line with several rare endangered species of plants, it has sustained diversity through decades of visitor-ship.
3. The city of San Diego wants to discontinue use of their section of Carveacre Road at Lyons Valley Road. I can support recreating a leg of Carvacre all on Forest Service lands by constructing this leg from the south possibly over the same low ridgeline to connect.
4. This would give the USFS the advantage by allowing them 100% of the management of this mountain.
5. This provides two access routes to the top of the mountain in case of fire and rescue efforts or to service the Sunrise Power link.

6. Bringing in a new segment of this road would over the top of the first saddle could provide a visitor-ship kiosk and overlook to all visitors by paving that first ¼ to ½ mile.
7. Bringing a new segment of this road would streamline and simplify management of the mountain by keeping it with the US Forest Service who is designed address rugged back country issues. .
8. Bringing a new segment of this road from the south would detour around the sensitive habit issues the City was concerned about.
9. Bringing a new segment of this road from the south would allow the US Border Patrol to continue their watch and other activities there.
10. Bringing a new segment of this road from the south would allow all recreational types to continue to enjoy this mountain.
11. Bringing a new segment of this road from the south should nevertheless be done with a full EIS.

See responses to comments 108, 112, 117, 123, and 125. The segment of Carveacre Road proposed for decommissioning is not needed by the Forest Service for administrative use.

### **UND114**

137) We are the owners of the property indicated, on one of your maps, as UND114. We would like to comment on two(2) PROPOSAL ACTIONS for the route leading to our property (UND114). As of this date, 5 JAN 2016, there is a gate at the Boulder Creek Road entrance to the access route to our property. There are two(2) locks on the gate (one is ours, the other unknown). As per telcon with Jeff Heys on 4 July 2016, we understand the PROPOSAL PROJECTS for that route would be:

ITEM No. 1- remove the existing gate and open that section of the route, that leads to our property, for public access.

ITEM No. 2- at the end of the proposed public vehicle access section of the route, which is adjacent to the entrance to our property, a permanent barrier would be installed to prevent vehicle access further down the route. This permanent barricade would not affect the access to our property.

Regarding ITEM No. 1(PUBLIC ACCESS SECTION): If there were no restrictions on Public Vehicle Access, any number of vehicles could use that access route, and since there would be no parking area along the route, even one (1) vehicle could block access to our property.

We agree that ITEM No. 2 is a good PROPOSAL ACTION. We would like ITEM No.1 to be NO ACTION. Leave as is.

We would keep the gate locked at the Boulder Creek Road entrance, and there would still be Public access, but with no vehicle access.

These comments are noted. The proposal to add UND114 as a public road has been withdrawn from Alternative 2 due to resource concerns and engineering constraints. The section beyond your property (UND114-2) would be decommissioned instead of converted to a non-motorized trail. A special use permit would be needed to grant legitimate road access to your inholding.

138) I have a comment regarding the proposed re-development UND144, a former jeep trail that leads to Boulder Creek. I led a field trip sponsored by the California Native Plant Society on June 17, 2012. Our field trip participants were all amateur botanists with only moderate skill. We parked in a well-developed parking lot above and west of Boulder Creek Road, with

---

shade trees, about 1/4 mile from Boulder Creek. We then walked down the abandoned UND144. We enjoyed the 1/4 mile walk to the creek, observing many healthy plants adjacent to and on the old road. The walk was pleasant though the day was quite hot, and the grove of healthy oaks shading the lower valley near Boulder Creek was very welcome. We then worked our way upstream along Boulder Creek for about 1/3 mile. We noted especially attractive blooming plants, but did NOT methodically nor comprehensively sample the flora.

I could not find a list of plants in the Draft EA, though it may be there. The document is very large and hard to use, and my time is limited. In order to add to the data, I will just share a very brief list of the species we made note of that were flowering when we had our field trip, among them:

*Amorpha fruticosa*, an abundant shrub in the canyon bottom where soil exists. I have not seen such abundance of this plant on other field trips to other canyons nearby. This is the food plant of the larvae of California Dogface Butterfly, the state butterfly.

*Calochortus splendens*

*Clarkia rhomboidea*

*Collinsia parryi*

*Ditasca glomerata*

*Dudleya pulverulenta*

*Eriastrum sappharinum* ssp. *sappharinum*

*Leptosiphon parviflorus* - several species of this genus are rare, though *parviflorus* is currently widely enough distributed to not be listed. It is only found in California, however, and sustaining a healthy, widely distributed population in its home range is the only protection against species decline. I suggest that this species might be a good one, among others, to monitor in this locale, to have a sense of environmental health.

*Pellaea* spp. Several species of ferns in crevices on the north-facing canyon wall.

I hope that this contribution to the review of the Project EA is helpful in guiding policy and management decisions. If UND144 is redeveloped to allow people to drive right to the creek, and a parking lot carved into the grove at the bottom, it is likely that the oaks will suffer from root compaction, and that the *amorpha fruticosa* population could be trampled and reduced if subjected to a much higher level of use by the public. As access to the creek currently exists, the short walk would keep out those who just want to just drive to a creek and be there. They can find places like that in Heise Park and Cuyamaca Rancho that provide that experience if they want it. I think that this area has a lot to lose by dedicating it to that kind of user.

See response to comment 137. This information is appreciated.

- 139) Considering the title of the subject proposed project, one would imagine it is the main concern of the Forest Service and the subject undertaking to protect and enhance the resources under its charge. However, we believe the plan to create a new recreation area and a new road at mile 10.5 of Boulder Creek Road would create numerous significant negative environmental impacts to the extent that an EIS rather than an EA should properly and legally be required.

We are familiar with the area and the sensitive habitat that it contains. We believe the abundance of threatened, endangered species, the ephemeral streams and ponds, are natural

---

treasures that would be irreparably damaged by incursions of off road vehicles and camping activities. The biological, riparian and endangered species in the area would be identified and thorough studies about them required in the EIS which would disclose the negative direct and indirect significant impacts. Also, an EIS would provide possible mitigation measures and/or alternative places to provide new roads and campsites that would not result in such devastation to natural resources. The public has a right to full disclosure of what is being planned that may have adverse impacts on significant natural resources in our public places.

We can appreciate the influence of the off road vehicle groups on the Forest Service to provide new recreational opportunities, but must strenuously object to the apparent collusion with those groups by the Forest Service by not considering alternative sites, such as a thorough EIS would provide. It is not reasonable to consider an EA as adequate protection against or prevention of the enormous consequences that this attempted documentary subterfuge would wreak on the environment. To continue with this dishonest attempt can be considered abuse of power by the decision making authority, and would not pass judicial scrutiny.

BCC is opposed to the backdoor method of placing this obviously environmentally damaging road construction and campsite proposal into an EA for what appears to be a good cause, namely, the removal of unauthorized roads. It is irresponsible of the Forest Service to succumb to this covert tactic at the expense of an area so rich in sensitive, threatened and endangered species. An EA is unacceptable and inadequate to the spirit and letter of NEPA, not to mention a betrayal of public trust in the Forest Service itself.

See response to comment 137.

- 140) I disagree with the plan to reclassify the unauthorized route known as UND114 to a public road. UND114 is a very old route that was illegally regraded by a private landowner after the Cedar fire. The landowner did not have CNF permission or the proper EIR/EIS and regraded the old route through CNF land in an attempt to sell a landlocked property for more money. The route currently has a locked gate the excludes everyone except the landowner. In years past, UND114 was a popular route to go have an illegal campfire or other mischief out of sight. I sent you photographs of illegal campfires in this area in the last comment period. The road in current state does not need to be opened to the public. The road currently is only one vehicle wide in spots with no place to turn around or park at the proposed end. The road is nowhere near the required 16 foot wide county rule. Do you plan to regrade and widen this road? Will the CNF be responsible for future road maintenance? Who will patrol this new off road camping area this proposal is creating? The existing road path of UND114 crosses a seasonal stream with a documented 100 foot flood plain. The road has no culvert and road grade exceeds 10% on the approach. Please respond with your plans for a road crossing on the new public use UND114 on a seasonal creek that is only several hundred feet from Boulder Creek which itself is a documented western pond turtle watershed. Please include in this creek crossing EIR/EIS for all known local amphibians including newts, frogs, and toads. Before discounting any of my comments regarding this seasonal creek, please note this area needs to be surveyed and studied during the wet season. Did the CNF evaluate this area to open for a public road during the wet season? Secondly, please note the extensive area this seasonal creek drains which is several miles long. In the 1970's and 1980's, this drainage supported a year round pond about 1 mile upstream on private land. This weekend, there were 3 cars

---

parked at the entrance to this road and Boulder Creek Road was reduced to single car traffic. How do you expect to manage this area when you have 50 cars parked here to utilize the new public road and trail? The current management attempt at Three sisters trail head right down the road is a disaster. This proposal adds another non environmental studied impact to an already congested Boulder Creek Road. Please explain why you are not doing an EIR/EIS on this new trail and road proposal. In conclusion, please do not open a new public road off Boulder Creek Road without an EIS/EIR and a management plan under the disguise of Unauthorized Route Decommissioning.

See response to comment 137. This information is appreciated.

- 141) One aspect of the route decommissioning plan is of concern, the addition of public road and trail at mile marker 10.5 on Boulder Creek Road. I believe this portion of the project requires more study on potential impacts. Particularly from increased human use and the access it facilitates to Boulder Creek such as increased erosion, trash and traffic as well as impacts to species of special concern known to occur in the area...

As has been demonstrated in other nearby areas within CNF containing significant falls or pools of water, unsustainably large crowds are drawn to them and, without active management for crowds, excessive damage to the habitat occurs. This new road and trail would provide access and an easy hike to a large pond on Boulder Creek. The easier hike could potentially facilitate even more visitors than 3 Sisters. As evidenced by the impacts of increased popularity of 3 Sisters and Cedar Creek Falls (prior to permit system) without active management serious detrimental effects occur to the habitats, stream courses, water quality and watersheds. There is a great threat to impacts on both habitat as well as species of special concern to the state of California including coast range newt, western pond turtle and two striped garter snake all documented within Boulder Creek at this location or within ¼ mile of this location. Moreover, because the terrain up and down Boulder Creek from this new road is fairly flat it is expected that there would be more impact on the stream course and surrounding habitat throughout. Including a cultural resource site ¾ mile upstream.

This road improvement and trail additions cumulative and indirect impacts to the habitat and Boulder Creek should be evaluated completely and separately from the road decommissioning project prior to approval.

See response to comment 137. This information is appreciated.

- 142) One of the most serious of these additions to the DEIS is the creation of a new road and trail at mile 10.5 leading north and east from Boulder Creek Road for approximately 1500 feet and then turning in to a trail which leads through a grove of old oak trees, across a riparian meadow next to Boulder Creek, and then parallel to Boulder Creek by approximately 20 to 70 feet about 200 yards to a large natural pool and the remains of a mine shaft now covered with steel grating.

Please refer again to items A through F of the National Environmental Policy Act listed above. By all observations, not a one of these actions were conducted according to NEPA for

---

the proposed addition of this new road in the Forest in this proposal. We are only told briefly that the new road would lead to disbursed camping alongside of Boulder Creek. Nothing else.

How disbursed? How “along-side” is it?-- After all, from the car to the “disbursed camping” is still another 1000-1500 feet --carrying camping gear. Not the ideal car camp site, not far enough to offroad; not far enough to backpack, too far from the car to the camp to exactly be car camping.

...Détente? A brand new strategy perhaps? ...In the immortal words of James Bond: “They” don’t have it; “we” don’t have it.”  
(Roger Moore: For Your Eyes Only, 1979-ish)

Not to mention one of the verbally stated reasons for stopping the road half way was to protect a riparian meadow in the flood plain next to the water. Good plan—if only one had been thought all the way through... However adding in the 13000 visitors in one season could mean trouble, -trouble environmentally to the stream ecology and the meadow, the dust, noise, human waste, litter, eagles, legacy oaks, visual impacts including graffiti under little ranger and law enforcement presence, and impacts to a recommended wilderness right next door, all listed more below.

Here is a short video taken within the last week of some of these primary concerns:  
<https://youtu.be/dTSJg0GuOKw>

There is no mention as to why this is needed or what potential impacts this would have to the environment or how the public might be involved in determining this need. Indeed the FSM also dictates that the progress of a project should be clearly communicated to public participants but this did not happen when the changes in scope to this project occurred.

This should have been a rather straight forward project. Somehow along the way other stuff was arbitrarily, and capriciously thrown in under the radar. As evidenced by my first rejected comment letter, that was before the December 18 comment start, I did not even realize that this addition was anything more than a gate allowing the Forest Service and qualified biologist’s administrative access to Boulder Creek for several ongoing studies in the works. We had been told in the past that that was the plan. Simple and done. By contrast, the 13,000 feeties trampling on this work is not going to do that much good either. By chance meeting, when Rob Hutsel from the River Park first alerted me that this was a full blown public road, trail, and consequently recreation area without a shred of management disclosure, EIS, or planning to go with it I was just sure he had it all wrong. Unfortunately I was to discover late in this process and most abruptly that I had it wrong.

Subsequently the author attempted to call the project manager thinking that this must be in reference to administrative access only for the purpose of ongoing highly appreciated wildlife studies concurrently occurring between the USFS, the San Diego River Park Foundation, and the California Fish and Wildlife Agency.

The reply was shocking in at least two ways: This was to be a fully public road for 1500 feet and then a new public trail. Knowing this section of the land particularly well, the

---

environmental impacts of this action are enormous, the presentation rather clandestine. However I was told with perceive touch of arrogance that the group that prepared this document was in favor of this project and felt like the existing Environmental Assessment was adequate.

Moreover more shocking than that I was told I could only supply comments but I was not allowed to ask any more questions –i.e. where they would be answering them --prior to the close of commenting; as they were not allowed to provide any more information.

Contrarily NEPA requires that there has to be provided enough information in order to make an informed decision. Clearly not nearly enough information has been provided for the public or even the decision makers to even grasp the required what , when , where, and how of this project to include that Boulder Creek could have water in it, much less the informed decision concerning impacts to that dynamic environment.

Then a member and the president of the off-road coalition invited me to their meeting to discuss this project where the very same Forest Service (FS) project manager would be talking to that group and answering questions about their concerns on this project. Additionally the chief assistant to Congressman Duncan D Hunter was present. He commented on the merits of the performance to date of our Forest Supervisor Will Metz to which I enthusiastically agreed. However he then mentioned that he had enjoyed full access to the communication with Will Metz and anytime he had phoned or emailed he had been assured a response.

We, -myself, or the years I have acted on behalf of the Sierra Club San Diego, as the former Chair of the Forest Committee, cannot claim quite the same. From the advent of the Rock Climbers issue on Eagle Peak on top of the Sunrise Powerlink, I have had to make appointments through Will's scheduler, sometimes weeks in advance in order to exchange communication with him more than the occasional one liner email. There is no more functioning voice mail. Nevertheless, meetings do not occur often enough, in my opinion, surely not for this project, about once or twice a year at best, and mostly in the context of the long, long, long, epic journey of these controversial projects that all began with the Sunrise Powerlink.

Prior to the second half of 2009, phoning, email, or face to face was relatively simple. It's now the privilege of US Congressmen, which hardly is surprising but under the circumstances the ground data or lack thereof is vexing project after project. This has been included as the need for more ground time for rangers in every comment period in a decade and a half. If I seem unladylike and steamed all I can say is it is costly, I love being there but it could be organized far and away more effectively and more than anything I would far rather be doing this WITH you than AT you!!! One more time right at Christmas I have to drop everything and get hiking the on an ethereal band-aide. One more time I learn that in fact this wasn't coordinated through the supervisor before publication.

The energy controversies have clogged the factual flow of information perpetuating the controversy. In the Boulder Creek area the pattern of attempted construction has occurred numerous times by some of the same people regardless of the photos and video sent to them of the area: One 2 foot by 6 foot photo of the area upstream wasn't even opened a month after

---

manually delivering it to the Forest Service office in Rancho Bernardo, during the course of the MSUP. Subsequently one of the options went right over sensitive riparian areas and waterfalls in the Sill Hill area up the face of Cuyamaca. There had been an 18 inch by six foot mosaic photo (a series of Costco 12 x 18 inch photos taped together--in the days before I learned to pan them electronically-- in severely dilapidated condition having once-upon-a-time hung on the wall of the Ray Street Sierra Club, ripped down on their move to Clairemont Mesa, I showed the former Rec officer, he insisted on intervening in its path to the trash, so it came to live on the back of his door) of Sill Hill's lower series of very remote and rugged monster falls had been on the back of an office door at the Ramona district and seen and noted by the same planners only to have them schedule its possible demise without ever going to see it. --going to see it, far from trivial. However the Sherpa lady, that would be me, as been offering to guide that walk for years. The published version even tried to indicate that this route was our suggestion. Its offensive at best an most definitely not mine. Our suggestion was to run any expanded line UNDER highway 79 from Descanso to Santa Ysabel. Cuyamaca wild lands had nothing to do with it, *ibid* the referenced comment letters above.

It is difficult to articulate how in contrast these actions are to the general impression and esteem I hold of these foresters in my own communication. The duality isn't under the bell curve at all.

Is it at all possible that someone is throwing this drama dust on us all to drive a wedge, create controversy, and prevent effective communication on these projects? Or is someone just that off track and that incompetent. The latter seems even more difficult to believe.

It may sound like an entertaining storyline but after living this for a decade I'm deeply concerned that this is way more than a good imagination, This now includes positioning this recreation area on Boulder Creek as though it was part of the stereotypic black and white controversy between "enviros" and "offroaders".

Guess again.

Anyone doing this now for the umpteenth time, specifically I don't know who, but it needs some qualified research, -they need, more precisely, we need for them to be removed from this forest and out of this region where they won't be influencing and marginalizing these projects with undocumented data any more. Further, I grow annoyed beyond wits end when the justifying rationalizing fingers fly at the Forest Supervisor. Once again these were done, -time and again, around his council and authority. IN this case, fortunately, I even took him and the district ranger to this area in the summer of 2009 and I know from firsthand conversation with the project planners that he was not told the specifics on the effort to make dispersed camping, nor did that realize until that moment that he actually had seen this area even better qualified than they. This is a problem considering he not only saw the water flow but the trout swim, apparently some serious history with trout--before the drought claimed these. Maybe we are supposed to believe otherwise but I'm crystal clear he didn't dream this stuff up, and I don't buy the simplifying blame, much to the contrary considering his actions when he has had the reins on the LMP SEIS and the MSUP. - We just had this conversation three months ago on the MSUP objection several times over and well documented.

---

Given the amount of effort we/ I have to put in, to drop everything, visit, photograph and assemble media, coordinate commenters, amateur or not, it should not matter to the actual data of this issue, given what it costs us in stress, time, and money, every time there has been projects without some foot to ground review first, it is high time we are provided the answers as to why this keeps happening, especially right in this general path across Boulder Creek. My standing on this issue is so communicated.

The assault on Cuyamaca was after twice trying to run transmission the full length of Boulder Creek Road and the Cedar Creek Wilderness as potential options for both Sunrise Powerlink and its expansion on top of the appearance of a most unique mountain top vernal pool and many rite of passage sites.

Now with the LMP SEIS and MSUP I referenced above, they are miraculously off the radar- we can only hope. Those projects should be long gone in the Forest. With this project only 200-300 yards downstream I'm very concerned they continue the attack on this general corridor in spite of recommended wilderness status, ROD on the MSUP, or current county subdivision issues.

How does this happen? It seems impossible knowing these guys that it would but there it was, and here it is? It would be an understatement that it puts non-foresters such as myself at hardship to have to undo and re-present these all over again when no one is taking in anything we have already presented. In a county bigger than three states one does not need to put a monster power line on top of a waterfall and over the most visible mountain in the county, - Cuyamaca. Now downstream a few of the same want to try another project again to compromise and develop the Boulder Creek area recommended wilderness notwithstanding.

I thought we had a decision on the MSUP, or do we? Do review above the outstanding progress and accomplishments so far, including both the comments from Congressman Hunter as well as the highest awards from the local Sierra Club San Diego during Wilderness 50. How many local dignitaries, -or politicians, for that matter, -- could come close to claiming as much. I know of -, well I know of none.

Do we have two Forest Services in our midst? An odd question but odder still the answer may well be, "yes".

Therefore I cannot attest to the NEPA and FSM requirements for public coordination and participation on this project except to say that by all observation first hand, the offroaders, the San Diego River Park, even San Diego County officials, and myself most often associated with environmental groups, were surprised and broadsided by the changes in the DEIS on this project.

When I asked the project planner if Forest Supervisor Mr. Metz knew of the plans for this new road, UND114 at mile 10.5 of Boulder Creek Road, he said, "well, he, um, knew of the basic plan, um - but probably not the specifics."

In other words, I'll take that as a "NO".

One of those specifics as it turns out is that Boulder Creek sometimes actually has water in it.

Then it occurred to me that this individual and the field trips that the planning group said they made to this project site had to have occurred last summer and fall during the worst drought in California History and that Boulder Creek could not have contained any water in the months that they obviously had to have visited. By then, wildlife is dormant or in retreat, flowering plants are long past the requisite flowering stages for identification in our Mediterranean system's dry season. The FS project planner confirmed at the meeting with the off-road coalition that this is true, this project was not reviewed while Boulder Creek was flowing.

How is that enough information to make an informed decision? It isn't. You, me, and the American people know full well, it isn't. It isn't EA standard either, as it is obvious to anyone that this suggested recreation or dispersed camping area would require a full EIS process.

How is it then that this project team has not even seen Boulder Creek flowing, has not listed the first attribute or criteria for this new recreation site next to a stream, not reached out to its stakeholders that both know the area very well and are very receptive to providing ground time and information, and yet, is so assured that this project would not need an EIS, or full Environmental Impact Statement? According to NEPA one of the reasons for an EA is to determine if an EIS is needed yet this review for the most part has not occurred to the new additions to the former scoping document at all or nearly adequately, even admitting-ly, to make such a claim before the Federal Government or its participating public.

The FSM also outlines the requirements for the participants and leadership in forest planning. San Diego is a Mediterranean Ecosystem where the streams are not necessarily flowing in the late summer and fall. This is a normal part of the environment of this region, a region nonetheless that is one of the most diverse in the country and contains a large number of threatened and rare species. Anyone managing a project in San Diego must have a working knowledge of a Mediterranean Ecosystem.

That having been said how are we to be assured that the same level of oversight applies throughout this global document? Fortunately in the case of road closures, decommissions, or repairs, mostly minor ones, the impacts are mostly favorable? –or are they? Again in this case I am not so sure this claim can be made for all of the items in this project or that they are minor. As they say, the devil is in the details. There is a saying among offroaders, “remove all access and there will be total access”.

Moreover with other projects on the horizon, AT&T master permit, control burning the Sweetwater River Valley, buying land at Guataay and allowing grazing to continue at Federal pennies on the Dollar, will project planners get both feet on the ground any better? In the case of the Sweetwater will Rangers be allowed the elbow room to visit enough to make an informed decision? If they cannot make it through the canyon the first time, or the fifth time, - and I doubt they will it is a tough scramble and has very little history to date, -will their working environment allow them to comfortably tell and explain the truth if they cannot make it through the impenetrable riparian area there? Or will they have pressure to be perfect and forced into rash conclusions that put us right back in this mess? I'm shuttering at the thought that I am going to have to walk the Sweetwater alone in a few months or it will be burned from existence with more cut and dry bantering to be done. To their credit the testimony on

---

fire management in this area before the county was absolutely outstanding. Again it is hard to imagine how the contradictions occur.

One of the root causes, not the only one I speculate, is the ongoing misunderstanding of chaparral, even moreso the importance of riparian meadows and streams when we only get 10 inches of rain a year, and the lens that newcomers use, a conifer or deciduous one, when they first try to evaluate plans here and make sense of our ecology.

As an aside I hope among the lessons learned include that San Diego's environment ALWAYS comes as a surprise to new comers. It is ALWAYS misinterpreted and misunderstood at first. We are to be getting a new Palomar District Ranger. Please take in the lessons learned and insure he is provided ample time with Rick Halsey and other Mediterranean ecologists, such as USGS John Keeley, before he makes decisions about our chaparral.

NEPA also requires the consideration of reasonable alternatives and consideration of resources where they are provided. There are numerous areas in the responses to scoping, some where we may agree, and others where we may disagree, that nevertheless, where commenters made viable suggestions but were dismissed without consideration and the articulated response was effectively that it was already decided. Then why do we have a scoping period if the project is already decided? Clearly the terms of scoping and public participation according to NEPA was not fully addressed.

Additionally the author would assert that in the last two decades I have a comprehensive knowledge of these areas that exceeds most of that the planning team that has rarely if ever been to the Boulder Creek project site. I have provided volumous information in the form of text, photos, and video to the Cleveland USFS. The validity of that information is well documented and supported in the record transpiring and resulting ROD 's for the SEIS to the Cleveland National Forest Fifteen Year Plan, the Pine Creek portion of the Forest Fire Protection or Healthy Forest Initiative, and the most resent MSUP. I have also at every turn offered to go on site with the USFS where my number one over all argument with this forest is that it needs more ground time for its rangers identified in every comment period to date including now this one.

It is most unfortunate that this team did not communicate with its well-known and knowledgeable stakeholders. I'm not the only one. I know firsthand as well that the San Diego River Park and CA Fish and Wildlife Agencies have spent considerable time in this area doing ongoing wildlife studies and research on the lands there nearly the only on record save for some bird surveys over fifteen years ago pre Cedar Fire by USFS biologist Kirstin Winter for the Natural History Museum. These too were not consulted.

This is not typical behavior for several of these Forest participants; nevertheless, it is unfortunate that they have not provided more than the most scant of information about the reasons and intentions for including this project that creates new roads with sweeping impacts under the roads decommissioning project and provided no indication to the public that this consideration was happening.

Essentially large road creating projects clearly requiring a full Environmental Impact Statement, or EIS, with considerable impact, were placed under this EA, with the appearance of trying to hide that requirement with the umbrella EA, late in the process. It is my concern that this was done to escape having to disclose the full impacts of those proposals and the effort to provide and document a full EIS dramatically under estimating and diluting the real impacts of this suggested recreation area. That some of these would do that however is nevertheless, not like them.

These are but a few of the issues we/ I am crystal clear will be formidable for this added, suggested recreational area and further below an itemized list originally prepared for the Sierra Club that didn't have quorum or Conservation Committee Chair available to approve:

The road does not have a place to pass, to turn around or to park.

The road is a major added issue to the hazardous, fire safety, environmentally damaging and severely annoying issues to locals of the already mounting issues from the 500 people and nearly 13,000 people a season that visit Three Sisters Waterfall at mile 13 on Boulder Creek Road 2.5 miles north of this suggested recreational area.

The road creates and eviscerates existing and severe erosion issues from the county's constant road grading and dirt dumping issues, some right above the project area and clearly contaminating it with an amoeba of nonnative dirt moving into it.

This would attract a significant number of people, I estimate similar to Three Sisters and Cedar Creek Falls; but even a conservative quarter of that number would fully comprise all of the issues of concern. For example, Three Sisters has been plagued with major littering, toilet paper and human feces left on the ground in most unfortunate quantity, added enormously to the road issues from thousands of unseasoned drivers, weekly rescues from unprepared hikers, lost, dehydrated, a lot of loud noise that would be amplified considerably in the narrow Boulder Creek Canyon, impact the locals severely, add to illegal trespassing and vandalism, compromise the limnology of a highly sensitive and unspoiled stream capable of sustaining trout, compromise the untrammelled character of a USFS recommended wilderness only 200-300 yards away, compromise several threatened species such as California brown newts, California pond turtle, nesting hawks and eagles, large covey of bats, and add to dust in the air.

The condition of the stream banks from the massive numbers of people in the Three Sisters example by comparison, that have come to over love the area contrast, from the time when no one came, is shocking. In the public occupied areas the banks are striped of vegetation and trampled down to hard packed earth. Graffiti has been an ongoing problem and the author has attempted to clean it up many times to have it eventually return.

The USFS has an upcoming project at Three Sisters Waterfall, to redirect the trail away from the edge of the stream from all of the impacts of the hundreds of people going there and trampling down the stream banks.

---

The effort of the public to get to the suggested recreation area would be far less, thusly encouraging even more numbers of people with even less backcountry skills, or awareness of special manners needed there.

So why would they now add to these impacts a project with at least as much potential for damage, and less strategy and planning?

Unfortunately, I have not been given that answer; moreover I was not allowed to even ask and cut short when attempting to do so because that information was not provided to everyone per NEPA public disclosure rules. This logic is a tad upside-down if not evasive; “That information” was required by NEPA to have been provided to all in the first place. This is not consistent with NEPA requirements to disclose the need for this project nor the impacts it presents.

This is also not consistent with the stated reasons for the umbrella project to decommission unauthorized routes. This road is essentially a dilapidated, tiny driveway for a local inholding, nothing more. It does not even appear on the USGS 1997 topo map. It has not been discussed before in Cleveland Forest documentation but it has been arbitrarily and capriciously added to this project with no apparent compelling reason.

1. The road construction project at Mile 10.5 of Boulder Creek Road was never disclosed in the scoping documentation, especially the suggested recreation area, road, and trail along Boulder Creek. NEPA requires the use of a systematic interdisciplinary approach in planning and decision-making but the public has not been provided compelling reasons for this construction.
2. Likewise the public and stakeholders were not provided an opportunity to participate in providing alternatives to the one stated goal of *disbursed camping* for this task.
3. Adding in a “task” to create dispersed camping is in of itself an entirely new project with a completely different goal and focus from *decommissioning and correcting the ills and impacts created by unauthorized off-roading*. New construction and new roads require an EIS and should not be under this EA umbrella of decommissioning projects.
4. This task is counter to the stated goals of this unauthorized road decommissioning project. It would create an impact worse than that currently created by all of the roads suggested for decommissioning in the Boulder Creek Area put together.
5. This task requires an EIS according to NEPA standards because it creates substantial impact to the environment.
6. NEPA requires that a project “Consider the environmental impact of proposed actions.” While there is discussion of the impacts of decommissioning a number of unauthorized off-roading routes, there is no discussion whatsoever of the impacts of creating this new one along with the trail and these impacts are severe.
7. The Forest Manual requires the purpose of a project be made clear. I assert that this project is arbitrary and capricious and no statement of purpose for this added recreation area has been supplied with a compelling reason for doing so.
8. The project planners did not visit the project area at a time when there was water flowing in Boulder Creek.

9. NEPA requires planning of a project to “identify adverse environmental effects that cannot be avoided should the proposal be implemented”. This did not occur even though there are many of them.
10. This project violates the Clean Air Act. It will add a hundred cars a day on a dirt road with considerable dust. There have been several cases of respiratory issues from locals in the area including concerns of valley fever from these cars stirring up imported soil. This will potentially double the traffic that is already problematic from visitors to Three Sisters Waterfall.
11. NEPA requires enough information to make an informed decision and enough information has not been provided.
12. NEPA requires project planning to “consider the relationship between local short-term uses of the human environment and the maintenance and enhancement of long-term productivity.” This did not occur. These were not reviewed at all for this new proposed construction and recreation area.
13. Likewise, NEPA requires project planners to “identify any irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented.” This project area is 200 to 300 yards from a USFS recommended wilderness. The wilderness effort took place over the last 2 decades and is designed according to the Wilderness Act to protect an area in perpetuity. This new recreation area would undermine the Sill Hill Unit of the recommended Eagle Peak Wilderness.
14. This project would compromise the scenic integrity standards of the wilderness adjacent to it.
15. This project would compromise the noise standards and untrammelled character of the wilderness adjacent to it.
16. The project team did not review the road creation to Boulder Creek at a time when Boulder Creek was flowing.
17. There is no plan in place to manage the estimated 13000 people that would visit this area if it was promoted in this way with a new road.
18. This proposed recreation area violates the the Endangered Species Act. There are California Newts, California pond turtles, rosy boa’s, arroyo toads. The whole micro environment, including a riparian meadow and wild unspoiled stream comprises a rare and endangered system. The project plan makes no reference to the potential threat to these species.
19. NEPA requires project planners to use a systematic interdisciplinary approach in planning and decision-making. This did not happen. The San Diego River Park Foundation and California Fish and Wildlife Agency is conducting Fish and wildlife studies in the area and were not consulted before publishing this suggested project.
20. This project would violate the Eagle Act and the Migratory Bird Order. There are nesting eagles and other raptures on the Mineral Hill cliffs above the project area and annual ducks migrate through the project area.
21. This project would violate the Clean Water Act. While project planners claim that this project would protect the riparian meadow from unauthorized offroaders, it would in turn lure 13000 visitors on foot in a season. It would compromise the natural character of the

---

overhand of the stream. There is no plan in place to manage human waste, trash, garbage, and litter, from this many visitors.

22. This plan would endanger a covey of bats.
23. This plan would violate gun restriction laws. There has been considerable illegal shooting in one area of the project plan. Additionally a large oak tree was so badly shot up that it was killed by illegal target shooting. There is no mention of how the Forest Service plans to manage these issues.
24. There is no plan in place to manage illegal target shooting, littering, graffiti, or damage to habitat.

See response to comment 137. This information is appreciated.

### **Border Patrol**

143) U.S. Border Patrol Challenges and Concerns:

- Border Patrol Agents use many of these routes in the course of their duties.
- Inability to access certain areas can significantly increase the time it takes for an agent to detect, classify, and resolve illegal activity.
- Closing the routes used in some of these areas will increase response time to emergency situations.
- The closures are intended to curb unauthorized off-road activity by the public who will likely attempt to circumvent these measures, potentially creating more issues for agents on patrol as well as for the USFS.
- Maintain positive relationship with the U.S. Forest Service.

The Cleveland National Forest appreciates the need for the U.S. Border Patrol to execute its mission on the National Forest, the level of detail provided in its scoping comments, and the office and field meetings that followed their submission. The Proposed Action has been modified in response to U.S. Border Patrol concerns but not to the degree originally requested. Instead, where critical motorized access was identified in the field, the decommissioning proposals were eliminated, whereas less critical routes in particularly sensitive resource areas remain proposed for decommissioning. Nowhere should this lead to significant delays in responses to illegal activity or emergencies. The likelihood of attempts to circumvent decommissioning efforts was incorporated into project planning and does not negate the need for the Proposed Action. Finally, unauthorized routes that the U.S. Border Patrol needs for its operations should be permitted by the U.S. Forest Service and maintained by the U.S. Border Patrol, but that need falls outside the scope of this analysis.

144) The following unauthorized routes off of Skye Valley Road are critical to Border Patrol operations:

- UND8561
- UND865
- UND8102
- UND8103
- UND8104
- UND8106
- UND8107

- 
- UND8108
  - UND8109
  - UND833

It is operationally very important for the El Cajon Station (ECJ) to maintain its current access to the routes listed above. They are connected by road 17S06 and form two (separate) continuous routes that provide their agents access to a remote yet desired traffic area for smugglers. In one month alone nearly three dozen undocumented aliens (UDAs) were apprehended in or immediately south of this area with almost twice that many apprehended in zones that lead directly to Hauser wilderness. Because of these routes an agent can respond to groups of UDAs in the area much quicker. The response time decreases from 4-5 hours to approximately 45 minutes. In this area of rugged, steep and dangerous terrain this time saving measure is critical for many reasons. Rapidly accessing Hauser Canyon has saved lives when searching for UDAs who have been deserted by their guides and left to fend for themselves. The Border Patrol has received many calls from other agencies reporting that UDAs are in distress (via 911 calls). With the very high temperatures during the summer months a quick response is critical for both the agents' welfare and the UDAs', not to mention other first responders who may be summoned to assist with a rescue operation. This area is one that is preferred by smugglers/foot guides due to the difficulty of apprehending people before they can find a route past the agents and because the natural environment provides a lot of cover to obscure them from sight. It should also be factored in that when agents can quickly apprehend UDAs in this area there is a decreased amount of impact being made to the wildness by virtue of the UDAs' travel being halted. Without these routes agents would be forced to start at one end of the wilderness area and walk east or west until the UDAs are apprehended. Additionally, these two trails allow agents the ability to quickly get to and maintain a high observation point known as "Fisherman's Point." This high point allows agents to have a view of almost the entire canyon. Being able to monitor Hauser Canyon without actually having to walk into it limits the Border Patrol footprint in and along the canyon. Being posted at visible high point is also a method of deterring smugglers from traversing that area.

See response to comment 143. Many of the routes listed here were found upon field visits to no longer exist on the ground. The two primary routes (UND865 and UND8102) that lead to the rim of Hauser Canyon were found to be severely eroding. Moreover, these routes lead to the heart of the Hauser Wilderness, where motorized vehicles are prohibited. Border Patrol agents on foot with handheld scopes could reach these viewpoints within 5 to 10 minutes of the time required to drive there. It is acknowledged that they would not be as visible for deterrence without vehicles, that handheld scopes are not as powerful as truck-mounted scopes, and that Border Patrol agents can benefit the Wilderness through apprehension efforts. Nevertheless, these routes are proposed for decommissioning due to their resource impacts.

145) A second set of routes south of Hauser Wilderness is also critical:

- 17S12
- UND569
- UND570

---

Routes 17S12 and UND569 form a lengthy east/west route on the southern side of Hauser Canyon. This allows the agents to travel near Hauser Wilderness on already established routes instead of creating an alternate path every time they are in pursuit of individuals. This string of routes is also critical for apprehending subjects before they are able to get into the wilderness (please note the apprehension figures in the above paragraph). Agents make every effort to get to UDAs before they are able to enter the wilderness, thus avoiding further disruption/damage to the wilderness by both agents and UDAs. Route UND570 leads to a critical high vantage point that agents use to both spot and deter UDAs from entering the canyon.

See response to comment 143. Based on an office meeting and field visit with Border Patrol staff, several segments of the listed routes were eliminated from the Proposed Action for decommissioning. Specifically, UND570 is no longer proposed for decommissioning, nor are several segments of 17S12. These were eliminated from the Proposed Action since they are critical for Border Patrol operations. The segments of 17S12 that remain proposed for decommissioning were not needed to access the critical locations for Border Patrol operations. UND569 is a redundant route to 17S08, South Boundary Road, would save less than a minute of driving time, and lies in a particularly sensitive area. It therefore remains proposed for decommissioning.

146) The following unauthorized routes on Horsethief Ridge are on/near an authorized road that is critical to Border Patrol operations:

- UND449
- UND451

This road on Horsethief Ridge that is accessed by a gate at the south end of Martin Ranch Road is very important to Border Patrol operations in Horsethief Canyon, Secret Canyon, Espinosa Trail, and Pine Valley. Border Patrol needs continued access through this gate in order to access the ridge. The two unauthorized routes listed along this ridge road are not in and of themselves critical. The concern is that their blockage could impede access to the entire ridge. The aforementioned canyons and trails are major egress routes that UDAs utilize to attempt to bypass both the State Route 94 and I-8 freeway checkpoints run by the Border Patrol. The canyons on either side of Horsethief Ridge act as funnels that guide UDA groups to the I-8 which is used as a pick-up point by the transportation node of the smuggling organization. Each month dozens of UDAs attempt to travel through this area. Access to this ridge road is critical as a tactical advantage when attempting to apprehend them before they escape at the freeway. It is also vital in order to perform rescues in the area.

These routes are not included in the Proposed Action.

147) The following unauthorized, interconnected routes parallel to Buckman Springs Road are critical to the safety of Border Patrol Agents in pursuit of UDAs:

- UND9073
- UND9077

---

This short route (referred to by agents as Cottonwood Valley Trail) provides agents access to search for evidence of and to track illegal activity south of Buckman Springs Road. Losing access to this trail would result in agents performing this task from the blacktop, thus putting themselves and the public unnecessarily at risk. This section of Buckman Springs Road sees numerous vehicle accidents (some fatal), has a narrow shoulder, and ices over during the winter months. This route is not one that agents overuse but it is critical to their safety when illegal activity has been previously detected on/near the trail. UDAs frequently use this route and Buckman Springs Road as a means of circumventing Border Patrol's traffic checkpoints on Old Highway 80 and the 1-8 Freeway.

See response to comment 143. A field visit with Border Patrol staff revealed that the listed routes were not critical to their operations after all, since this stretch of Buckman Springs Road has a wide shoulder, and the primary unauthorized route parallels the road in very close proximity to it. Because they lie in a particularly sensitive area, these routes remain proposed for decommissioning.

148) There are three additional unauthorized routes that Campo Station needs to maintain access to:

- 17S12
- UND569
- UND566

Two of these routes are the same routes that the El Cajon Station requires access to as well. Campo Station uses them to enter the southeast end of Barrett Lake and the southern parts of Hauser Creek and Cottonwood Creek. The ability to retain access to these roads allows agents to pursue and apprehend UDAs prior to entering Hauser Canyon where the terrain and the poor radio communications are an officer safety concern. Route 17S12 serves as a crossover road that will save agents significant time to interdict illegal activity before it can make it into Hauser Canyon. More importantly, agents, UDAs, and hikers have had to be rescued from this area. Route UND569 connects to 17S12 and it helps agents respond westbound more quickly. Continued access to these routes decreases the response time to perform rescue operations. Route UND566 is not absolutely critical to operations but it is used at times when agents are unable to apprehend UDAs before they successfully enter the canyon.

See response to comments 143 and 145. Route UN566 is extraordinarily steep and eroded, making it impassible by motor vehicle, and so it remains proposed for decommissioning.

149) There are numerous gates listed on maps

DRDSouth\_UNA\_Resource\_Ranking\_Scoping\_FVM and PRDSouth\_DRDNorth\_UNA\_Resource\_Ranking\_Scoping\_FVM that are critical to the Border Patrol's mission. It is unclear by looking at the map the type of gate or blockage that is being considered. There is currently a downed tree at the access gate labeled "M" on Appendix B that is hampering patrol efforts. Border Patrol would like for that tree to be removed so that access is restored. These gates are absolutely necessary for patrol operations. Appendix A-D identifies the critical gates/access points. It is imperative that these particular routes are not blocked by immovable barriers such as boulders and logs. If these gates need

---

to remain locked Border Patrol can add a lock and agents will ensure that the gates are locked behind them.

The gates shown on the scoping maps are not part of the Proposed Action and so would not be affected by the project. Continued partnership on gate management is appreciated.

- 150) There were unauthorized routes in the Newton-Azrak (Murrieta) station area of responsibility but none were identified as being critical to operations.

This confirmation is appreciated.

- 151) In the process of reviewing the Unauthorized Route Decommissioning Project I found the method used by the Forest Service to depict the routes and their identifiers to be clear and easy to understand. The fact that we were able to magnify the image to the degree necessary to view the route numbers without distortion was very helpful. While the maps were large and it took some time to familiarize myself with the route locations, it did not take long to fully understand how to use/read the maps.

This supportive comment is appreciated.

- 152) The Special Operations Supervisor at the Campo Station asked me to share with you that some of the current gates are being circumvented by smugglers as well as recreational OHV users. He has video and photographic evidence that he can provide if you would like me to obtain it for you. Fortifying the existing gates would not only assist you with your project, it would help Border Patrol Agents secure and patrol the area more effectively. The following are the gates that were specifically mentioned:

Bear Valley Gate - Being circumvented by motorcycles and ATVs  
Lower and Middle Kitchen Creek Gate - Being circumvented by motorcycles (on weekends)  
Thing Valley Gate at Fred Canyon Road intersection - Rocks placed by USFS have been moved by locals so they can ride their motorcycles through the area

This information and offer of assistance are greatly appreciated.

### **Natural Resource Concerns**

- 153) At Mile 15 where the county put a miniature mountain of dirt - what we call the McCoy trail head and definitely needs another name.. oh yea the BjornFried overlook.... You guys put a barricade there at a time when the dirt covered part of the issue. Once the dirt was gone there are people going around it and shooting, shooting oak trees. Additionally they are driving around it and way up on the hill to the east there to sit and watch for whatever they are hunting, even car camp hidden up there. Extending that barricade would be high on the list as this is not a wise location for a shooting range. The whole pasture areas from mile fourteen and fifteen has a lot of vulnerability to hunters and offroaders going up on the hill and connecting with SDG&E's access and getting into Cedar Gorge, or just making a mess right there. It is also vulnerable to hunters driving onto the pasture to the south and east side.

---

The Proposed Action includes the addition a short segment (UND102) to the National Forest Road System as a parking area off of Boulder Creek Road, along with extension of the existing barrier on the north side back to the road. The existing barrier and barbed wire was found to be functional to the east and south.

- 154) We appreciate this effort. The former decommissioning in the Palomar region a few years ago made a significant difference to the quality of the land.

This supportive comment is appreciated.

- 155) At mile 14.8 on Boulder Creek Road there is already some steel barricades. Hunters have been able to go right around this and drive up on to the top of the hill overlooking the McCoy Ranch area. Additionally there is considerable target shooting. This is an inappropriate and dangerous combination.

No new barrier needs or signs of vehicle trespass were observed in this area.

- 156) At mile 13.5 and the green Forest Service gate leading up the hill and reconnecting with Boulder Creek Road about mile 14.5 SDG&E uses half of this road. When the TL626 is decommissioned all of the associated roads should be decommissioned to. There is some illegal offroading that extends into the northern half of this that is not SDG&E. this should be stopped now. On both sides of Boulder Creek Road for the mile between 13.5 and 14.8ish offroaders and especially hunters randomly decide to tear down the fence if there even is one and drive across the meadows. This area needs some restrictions from this.

Permitted SDG&E access roads in this vicinity are proposed for decommissioning via the SDG&E Master Special Use Permit and Permit to Construct Powerline Replacement EIR/EIS that is nearing a final decision at the current time. They fall outside the scope of this project, and no additional barrier needs or signs of vehicle trespass were observed in this area.

- 157) The access road to TL626 from the McCoy Ranch to the Weflen ranch that goes across Boulder Creek Road needs to be decommissioned NOW as well as the TL626 access road that goes across Cedar Creek . This has been well acknowledged as a clean water act issue for both streams. The issues are very similar and not good for the streams. SDG&E needs to manage whatever 12kv portions of their line that are to remain by air or foot. However because these are to be 12kv in the future we are adamant that they should be underground and continue to be a fire and environmental hazard above ground. Nevertheless these stream crossing areas are a league of their own and need to be closed as a priority. Likewise you need to assure that there is no local access offroading going on there.

See response to comment 156.

- 158) At Tule Springs there are a number of user created roads that were significantly expanded in the pig search frenzy. The only access was from reservations, not necessarily by local tribes people. While we agree that Native Americans have access to sacred Sites, the type of access and offroading that is going on in the Tule Springs, Dubois Road, Tule Springs Road areas is far from Sacred. This is not appropriate and these user offroading areas need to be closed off. Tribal elders should be alerted as well.

---

Multiple unauthorized routes are proposed for decommissioning in this vicinity, and the Viejas Band of Kumeyaay Indians has assisted with and been kept informed about the project.

159) The offroaders should be kept off of SDG&E access roads. As mentioned they should all be removed with a 12kv underground.

See response to comment 156.

160) Green Sticker Vehicles should not be allowed on Boulder Creek Road and signage should reflect this. I do not favor Green Sticker vehicles on Cedar Creek Road and I would argue that that option was not provided legal review during the Road Review a few years ago. In every open house before the decision I was told that Cedar Creek Road was NOT for Green sticker type offroading. There is no real area for trailers and portions of the road are quite dangerous for this activity as well as being a terrible place for noise and environmental impacts.

Green Sticker Vehicle appropriateness and management on designated roads falls outside the scope of this analysis.

161) One of the best moves in all of the Forest is the closure at Smith Pond. This was one of the most far reaching impacts in a good way to date. Unfortunately a USFS employee un-decommissioned the road months after it was all raked out and decommissioned. It has been closed off again but the rehab is slow. PLEASE make sure all employees are onboard and not doing this!!!!

Forest staff are being made aware of this project, and the Proposed Action includes signage to clearly show where restoration is occurring.

162) ON eagle peak road at the pond trail head the barricade is a farce as it would come right open. If you haven't found this yet please fix. I personally rather liked this at the pond but I won't argue.

This work is already authorized by the 2009 Upper San Diego River Unauthorized Routes Decommissioning Project Decision Memo and so falls outside the scope of this analysis.

163) The road along the rim of Hauser Canyon in a yellow area you are now labeling "Recommended Wilderness"—I'm a tad surprised but I won't argue. Christmas Card for life if this is really true! There are a number of issues in this region. This road was on the old topos when I first went there but very over grown. When it approached on the westleg to the lake and then turns east there is a dog leg north that definitely should not be there. I think I am the first to go to that overlook and it is breathtaking but it never had a road to it. It was difficult to find the continuity there but now it appeared to be well trodden. This all needs some review with the Border Patrol. It would be out of sync with wilderness but not necessarily with IRA status. I DO think it should be definitive with the Border Patrol as they have acted on their own a lot in BLM and this should not carry over the the USFS. They should Pay for a permit if they want road access. To date I'm sure that was not happening.

---

See responses to comments 143, 144, and 145. The Forest Service has consulted with US Customs and Border Patrol about the routes that surround Hauser Canyon, and their input has been incorporated into the Proposed Action.

- 164) There are some very serious offroading issue IN the Hauser Wilderness . These should be given priority closure. They are not on you map but if you look on Google maps they are clearly there.

Two primary routes in the Hauser Wilderness are proposed for decommissioning: UND865 and UND8102. No other unauthorized routes were found there that need to be addressed at the current time.

- 165) There is an offroad trail in the center of Pat's canyon and another where someone has lifted your barricade out of the ground to access Dry canyon and can now go quite a ways. Their route goes in the middle of a stream with a lot of tadpoles when there is water. There is a lot of bogus offroading there and south through Rattlesnake Canyon.

There were few known unauthorized routes in this vicinity, and the survey need surpassed the amount of time available on the part of the project interdisciplinary team, and so this area was not surveyed.

- 166) There is additionally a portion of Pats Canyon between Sunrise and Barber Mt Road that is exceptionally fragile and unique. I hope you are monitoring from time to time.

See response to comment 165.

- 167) There is a parallel road to the Barret lake Road that should not be there. It may be a Boulder Patrol created route. The access road in there to Sunrise is disgusting. This tower should have been accessed by air or foot.

See response to comment 165. Access roads permitted to SDG&E for the Sunrise Powerlink are beyond the scope of this project.

- 168) Also the road to the upper San Diego River Gorge should be a priority closure.

This unauthorized route (UND384) is proposed for decommissioning.

- 169) Ideal spot for additional gates. Multiple old fences in area to tie gates into. In the area between UND735 and UND736 along Tule Springs Rd.

The Proposed Action includes the installation of barrier and a gate at Pine Grove to prevent the unauthorized use of Tule Springs Road to the east rather than the suggested placement.

- 170) Please add additional gates shown in blue to restrict offroad vehicle racing from adjacent Native American land. New gates would act as further restrictions when gates are compromised. Tule Springs area has no oversight to stop repeat unauthorized road establishment.

See responses to comments 158 and 169.

---

171) Mile 10 Boulder Creek road. Please add pipe fencing to this area. Small turnout historically used for beehives has since become a huge gravel yard, landing strip, place to spin your tires, etc. Unauthorized road to right goes down to turn around area which frequently has illegal campfires and target shooting since it is out of sight. Some people even drive further east into the small meadow. Additional pictures will show current situation. Area has plentiful native bunch grass that is been disturbed.

The Proposed Action includes the partial decommissioning of this site (13S08-8.83R-1), including barrier along the road with a gate to allow apiary access for the permittee.

172) This unauthorized route was done by gold miners in 2014 who repeatedly cut the barbed wire fence on the south side of Boulder Creek/North side of Boulder Creek Road to drive in gold mining equipment on CNF land. Entrance is partially blocked now with branches. Please replace old fence along Boulder Creek riparian area. See additional photos of area.

The Proposed Action includes the decommissioning of this route (Boulder Creek 1) through the placement of boulders to block access.

173) Please install barrier and gate blocking McCoy Ranch road in CNF section. Please include gate and access for property owners, but limit the public vehicles that race up and down these roads. McCoy ranch road is privately maintained in the CNF forest section, yet the public does all the damage. Controlled access at this point would also limit meadow off road damage.

The gating of this permitted road would be the responsibility of the permittees, not the US Forest Service, since no vehicle trespass was observed originating from the road.

174) Please repair, replace, and or install as needed fencing along Boulder creek road in the meadow near mile 14. See blue lines on map. This section gets several vehicles a year who think they can drive cross country through the meadow to get to a better spot. The meadow currently has some old fencing in spots, but was never properly fenced when this section became CNF land. An additional photo showing vehicle tracks through meadow has been submitted.

No new barrier needs or signs of vehicle trespass were observed in this area.

175) Area circled in red is access point for private inholding that has turned into parking area, campfire area, spin your tires in the dirt area. Please evaluate this riparian meadow area. Please allow access to private land beyond, but block unauthorized vehicle use in the meadow. Location is south side of Boulder Creek Road south side of Boulder Creek.

This short unauthorized route was determined not to warrant the extent of barrier that would be needed to block access to it, and a gate would be the responsibility of the private landowner.

176) Boulder Creek crossing and Boulder Creek Road south side. Red Circle area and line are area's of unauthorized vehicle travel. Needs barriers and private property access gate.

---

See response to comment 175.

177) Location UND102. Unauthorized route around barrier. Illegal target shooting.

See response to comment 153.

178) Tire tracks through meadow mile 14 Boulder Creek Road near intersection of McCoy Ranch Road. Area needs a fence on both sides of the road in meadow area. Summer 2014.

No new barrier needs or signs of vehicle trespass were observed in this area.

179) Location UND114. Needs proper barriers. Unauthorized route leads to secluded area that has frequent illegal campfires. Please see additional two photos of this area.

The Proposed Action would add the first half of this route (UND114) to the National Forest Road System for public use and block vehicle access to the second half (UND114-2) while adding it to the National Forest Trail System for non-motorized use.

180) Unauthorized mining route 2014. Current state as blocked by local residents. Please block and fence CNF riparian area along south side of Boulder Creek and North side of Boulder Creek Road. See additional comments with map location added.

See response to comment 172.

181) This unauthorized route up mineral hill starts just outside private fence line on North side of private property along Boulder Creek Road near Johnson Creek. Route is purposely hidden by tree branches and several strands of unattached barbed wire.

Private landowner permission would be needed to survey this site and has not yet been obtained.

182) Location UND114. Area used for remote vehicle based camping utilizing UND114. Please note illegal campfire ring and with recent use, summer 2014.

See response to comment 179.

183) Tule Springs road at Pine grove on CNF land. Off highway vehicle full of people who appeared to be of Native American decent. Vehicle is roaring up and down all unauthorized routes in this area. This picture was taken after over an hour of racing around in and out of CNF and Indian land. Vehicle came from the west and returned to the reservation land west of the CNF after this picture was taken of them. This picture is clearly taken on CNF land, these law breakers told me I needed to leave and that I was not allowed to be there. March 2013.

The Proposed Action includes multiple decommissioning efforts along Tule Springs Road.

184) Tule Springs road in the CNF vicinity of Tule Springs has long been an illegal offroad playground for Native Americans and their friends. I approve of the proposal closures in this area and ask you go one step further and install additional locking gates every .5-1.0 mile

---

along Tule Springs road on CNF lands. These additional gates will serve as additional protection to off road racing in this area. Tule Springs road is never patrolled by any CNF officials, so additional barriers are needed.

See responses to comment 158 and 169.

185) The unauthorized route UND 102 has illegal target shooters every few weeks. An unauthorized new road now extends north to get around barriers. See pictures of illegal target shooting, shot up Oak tree, and new road.

See response to comment 153.

186) Near location UND735 and UND736 on Tule Springs Road. Fence has been cut with new unauthorized route.

Both of these unauthorized routes were surveyed, and the barrier and gate proposed for Tule Springs Road at Pine Grove would block access and allow them to naturally revegetate.

187) Picture 1a. Unauthorized route off Boulder Creek Road south of trail head to Three Sisters Waterfall. This road was blocked prior to cedar fire with wood posts put in by CNF. Post burned out and this isolated canyon became a place to have illegal campfires, dump stolen cars, etc. Please block this unauthorized route.

The Proposed Action includes the decommissioning of this route (13S08-10.95R-1).

188) Near UND736 on Tule Springs road. Image shows illegal off road use. Note how unauthorized vehicle tracks turn and cross country travel into the chaparral.

See response to comment 186.

189) Tule Springs Road at Pine Grove. CNF illegal off road activity.

See response to comment 169.

190) McCoy ranch road at the intersection of Boulder Creek Road needs to be blocked to public access. Please maintain private property and SDG&E access. Road maintenance is only done by property owner with shovel. CNF users like to drive up and down in the mud and make a mess of these private roads. Closure of this private road infrastructure on CNF land would stop further damage to surrounding meadow area.

See response to comment 173.

191) Please see red line drawn in. This illegal road was bulldozed maybe 7 years ago. Entrance is hidden, but located just outside private property boundary on boulder creek road. Someone was trying to create access to an inholding without CNF approval. Old green painted over real estate signs mark entrance. Further description of entrance to the road is in additional comments.

See response to comment 181.

192) The Proposed Action calls for field surveys to determine the final restoration methods for each route. However, it is stated: "... For most routes, restoration would be accomplished through extreme surface roughening ... to loosen compacted soils and prevent further erosion. ..." OCCNPS has three concerns with this method:

1. Depending on the route's slope and soil type, breaking up its surface may lead to greatly increased erosion during rain events. The roughened ground can easily become colonized by fast-growing, fast-drying non-native invasive plants, which would add corridors of flashy fuels throughout the areas that are supposed to be returned to their "desired condition." OCCNPS strongly recommends that the restoration sites and adjacent areas should be surveyed for existing non-native invasive plants and any found should be treated/removed before ground-roughening or other methods are begun. The ground-roughening equipment should be cleaned at an offsite location to ensure that it doesn't bring in invasive seeds from elsewhere. Likewise, any rocks or gravel that may be brought in should be cleaned beforehand.
2. "Seeding of native plant species" seems almost an afterthought to "... require different strategies to prevent resource impacts ..." for particular routes. OCCNPS strongly recommends that seeding or planting of appropriate native plant species in the restoration sites will greatly enhance the sites' natural recolonization by propagules from the surrounding native vegetation, and keep the sites from remaining open to colonization by invasives.
3. It is stated that: "... each site would be monitored annually for five years to ensure that the barriers remain effective ... and that soil erosion has been halted." OCCNPS strongly recommends that the monitoring include a specific maintenance plan to discourage invasives and encourage natives. Strong growth of native vegetation will be an effective barrier and erosion preventive.

The language of the Proposed Action has been adjusted to clarify that multiple methods will be used for restoration. The methods are specifically prescribed for each route by the Forest Hydrologist to reduce erosion. Surveys were conducted for invasive plants, and design features were included in the Proposed Action to require their treatment and the cleaning of equipment before earthwork would begin. The Proposed Action has also been adjusted to include seeding of native plant species where disturbance would exceed 10 feet in width, a threshold determined by the Forest Biologist for local vegetation to swiftly recolonize the disturbance. Where invasive plants were found along unauthorized routes, the vegetative restoration would be monitored, but this level of monitoring was not determined necessary for other routes.

193) The basalt-derived clay soils in the vicinity of Elsinore Peak are home to a suite of special-status native plants (see Table 1) in addition to the Federally-listed Munz' onion, making the area one of OCCNPS' favorite wildflower field trip sites. We are glad that the area's unauthorized vehicle routes are on the list to be studied for decommissioning. We ask that the area's flower-watching trails not be among those deemed redundant.

TABLE 1: Special-status native plants found on the basaltic soils in the vicinity of Elsinore Peak		
botanical name	common name	CRPR
<i>Allium lacunosum</i> var. <i>lacunosum</i>	pitted onion	1B.1
<i>Allium munzii</i>	Munz' onion	1B.1
<i>Brodiaea filifolia</i>	thread-leaved brodiaea	1B.1
<i>Brodiaea orcuttii</i>	Orcutt's brodiaea	1B.1
<i>Brodiaea santarosae</i>	Santa Rosa basalt brodiaea	3
<i>Chorizanthe polygonoides</i> var. <i>longispina</i> .	long-spined spineflower	1B.2
<i>Fritillaria biflora</i>	chocolate lily	4.2
<i>Harpagonella palmeri</i>	Palmer's grappling hook	4.2
<i>Microseris douglasii</i> ssp. <i>platycarpha</i>	San Diego silverpuffs	4.2
<i>Sibaropsis hammittii</i>	Hammitt's clay-cress	1B.2
<i>Toxicoscordion venenosum</i>	meadow death camas	4.2

The unauthorized routes in the vicinity of Elsinore Peak were mistakenly included in the scoping map but were already decommissioned in the summer of 2015, as authorized by the Wildomar Off-Highway Vehicle Management Plan EA and Decision Notice signed in 2014.

194) We completely support the project to eliminate unauthorized routes on the Cleveland National Forest, and to restore the landscape resources to their best possible natural conditions at the selected sites. We agree that educating and directing motor vehicle users to legal opportunities should be part of the project (as stated in Purpose and Need, Scoping Letter), and also that signage and a 5-year monitoring period should be included (Proposed Action, Scoping Letter). The information included in the Scoping Letter about the project's Purpose and Need, the Proposed Action, and the guiding goals, strategy and standards of the Land Management Plan for the Forest provides a clear justification and mandate for the project activities. This project is a good example of professional civil service management and good stewardship of National Forest public resources for the greatest overall, balanced public benefit.

This supportive comment is appreciated.

195) The City of San Diego Public Utilities Department has reviewed the draft environmental assessment prepared by the Cleveland National Forest for the proposed Forest-wide Unauthorized Route Decommissioning.

The City supports the proposed decommissioning of the highest priority unauthorized routes, called out as the Alternative 2 in the draft environmental assessment. The City also supports the proposed adjustments to the National Forest Road and Trail Systems to limit impacts to natural resources and to protect water quality.

The Public Utilities Department owns and manages nine water supply reservoirs and nearly 42,000 acres throughout San Diego County. We manage these lands for source water protection in our reservoirs. The lands of the Cleveland National Forest (Forest) are largely upstream of our reservoirs. The Cleveland National Forest was created more than one hundred years ago principally to protect municipal water supplies of the City of San Diego and neighboring communities. The lands of the Cleveland National Forest continue to provide extremely valuable ecosystem services that will sustain the quality and quantity of water resources. Maintaining a healthy natural landscape across the Forest is the best way to protect the public water supplies of downstream communities. Decommissioning unauthorized routes and limiting the impacts of Forest roads is an important component of the Forest's actions to protect and sustain water resources.

This supportive comment is appreciated.

196) The Orange County Chapter of the California Native Plant Society has always been concerned about the welfare of the Santa Ana Mountains' native vegetation. The Trabuco District of CNF encompasses by far the largest area of native vegetation remaining within and adjacent to Orange County, especially most of the County's chaparral and other higher elevation vegetation types, and much of its riparian vegetation. Thus the District's management activities affect a proportionately large percentage of Orange County's native plants.

OCCNPS strongly endorses the project's intent to decommission unauthorized routes throughout the District and restore the sites to the "desired condition." It is gratifying to see that many of the suggestions OCCNPS made in its scoping comments have been incorporated into the Proposed Action.

This supportive comment is appreciated.

197) On preventing the spread of invasive species:

- Weed-seed-free straw wattles/bales, matting, mulch, slash, chips, and imported/transported fill should be specified throughout, in addition to the specifications for equipment cleaning and invasives removal.
- The document correctly specifies obvious and long-present invasives such as arundo as high priority. However, new, emergent, invasives should also be high priority, even if they are not always obvious.

OCCNPS 's Emergent Invasives Management Program ([occnps.org/invasives.html](http://occnps.org/invasives.html)) includes detailed information sheets for easy field identification of the 19 species we currently consider "emergent." We invite District staff and contractors to use the sheets during their work on this and all other projects, as part of our mutual interest in preventing the spread of invasives in our wildlands. We would appreciate learning of any new sites for emergent invasives that may be found on the District.

A design feature of Alternative 2 has been updated to require the use of weed-seed-free materials (p. 7). New, emergent invasives would be considered "high priority," such that the existing design

---

feature is applicable, and would be managed through the approach identified in the Cleveland National Forest Invasive Weed Management EA and Decision Notice. The suggestion to share information is appreciated and would be coordinated by our Rangeland Management Specialist.

198) I support your efforts to enclose UND102 with a metal barrier. In reading the current CNF plan, you fail to extend the metal barrier on the southside of UND102. The document states a barbed wire fence on the southside is adequate. I disagree and urge the CNF to completely box this area in with metal pipe barriers. Over the last 30 years, this area has had numerous barbed wire fences that were easily torn down and forgotten and UND102 was created by one of these torn down and forgotten fencelines. Almost every weekend in recent memory I see somebody driving off road beyond the current metal barrier and this is usually followed by a barrage of illegal target shooting. Please include signs stating rules and regulations in addition to these new barriers. The current CNF management philosophy at UND102 on Boulder Creek Road is that people should know the rules, but this philosophy is not working.

See response to comment 153. There are many areas of the Cleveland National Forest where there is no physical barrier to vehicles driving off of designated roads and trails. For this project, actively used areas were prioritized over areas where no recent vehicle signs were observed. In this case, an intact barbed wire fence would continue to be patrolled and maintained as necessary, as ensured by the monitoring requirements of Alternative 2. If it fails to prevent vehicle use, barriers could be considered at a later time.

199) The CNF needs to address in the route decommissioning plan the travel and use intent of the area known as McCoy meadow in the CNF. In prior comments, I addressed the numerous routes through the CNF meadow lands at Intersection of 13S08, Boulder Creek Road, and McCoy Ranch Road. Basically, the roads currently traveled are private access to private in holdings and SDG&E infrastructure. The public has been using these routes as public routes for the last 20+ years or since this area was purchased from the Rutherford family and the gate removed at the intersection. None of these roads are publically or CNF maintained, yet they are continuously utilized as access routes. In the CNF response to prior comments on this area, you state SDG&E (the permit holder) is responsible. Between the two agencies, CNF and SDG&E, one of you needs to block the unauthorized public from these routes. One of these routes was decommissioned several years ago in the last CNF process by using rippers on the surface with a bulldozer. People immediately began driving over it, as soon as the very next day. This weekend you cannot even tell the road was decommissioned. The meadow areas all along these routes have low grass and during the spring and fall hunting season numerous temporary routes open up with people looking for a better place to hunt or camp from the seat of their pickup truck. Please address the unauthorized public use of the routes in this area and take appropriate measures.

See response to comments 173 and 198. In this case, the Cleveland National Forest will work with the permittees to address any vehicle trespass issues found through monitoring.

200) I submitted pictures of the area south of the Boulder Creek crossing in prior comments and would like to restate the need for use definition in this area. Current state is a torn down fence that serves as both as an access point to the private in holding directly south, a spot to park, a spot to illegally target shoot, a spot to drive off road around in the mud, and lately this area is

---

the San Diego River Park Foundation Overflow Parking Lot. Where is the EIR/EIS for a 30 car parking lot in this spot? This spot had at least this many cars on December 12, 2015 and a posted sign that read San Diego River Park Foundation Overflow Parking Lot. Please re-evaluate this area and add metal pipe barriers of an appropriate size at this location to provide protection and utilization of this area. I read in the document I am commenting on this area is a private land issue. This area is not a private property issue, but a CNF issue with huge impact on the surrounding area. This spot needs line definition for boundaries of use or the public will continue to expand this area into the meadow as they see fit. Additionally, please check to see if this area is in the 100 year flood plain and needs to be managed as such.

See response to comments 173 and 198. This area has not been authorized for use as a parking lot, and the area within 328 feet of Boulder Creek would be considered a Riparian Conservation Area under the Cleveland National Forest Land Management Plan, regardless of the 100-year floodplain. In this case, the Cleveland National Forest will work with the permittee and adjacent landowner to address any vehicle trespass issues found through monitoring.

- 201) TCLC director David Hogan has previously raised with you the issue of systematic, temporary closures of high-risk CNF routes during periods of high fire risk to reduce the likelihood of wildfire and resulting harm to public safety and natural resources. High-fire risk routes are an important issue of public safety and resource protection and should be added to the resource ranking formula used by the CNF to identify problem routes. This issue is integral with route decommissioning and we urge you to address fire-season management of routes as part of your decision on the route decommissioning project.

To achieve project objectives, certain CNF routes should be closed to motorized vehicle access by the general public during periods of high fire risk. In particular, no new routes should be added to the CNF system as part of the routes decommissioning project without this measure. Important and strategic objectives of route decommissioning to reduce harm to resources will be ineffective if no simultaneous action is taken to reduce high-risk activities and resulting ignition sources on nearby routes during periods of high-fire risk.

It is well documented that wildfire ignitions on the CNF occur most frequently along roads. As shown on a fire starts map prepared by the CNF, wildfires are routinely ignited along CNF routes. Dangerous ignition sources are common and include tossed cigarette ends, campfires, drug use, and target shooting, and Forest Service law enforcement is far too limited to effectively control these problems. The routes decommissioning project should therefore include measures to reduce the risk of fire along CNF routes to achieve project objectives. Vehicle access by the general public on high-fire risk CNF routes should be barred during each normal fire season as well as for extended periods during any period of drought. Gates and vehicle barriers should be installed at strategic locations as needed to implement vehicle closures. And law enforcement should be increased as needed to address common, illegal, and high fire-risk activities in these areas. Specific roads with documented fire-safety problems that should be subject to temporary fire-season or drought closures include Anderson Truck Trail, Bear Valley Road, Carve Acre Road, Deer Park Road, Indian Potrero / Pine Mountain Road, High Point Road, Miner's Road, Palomar Divide Road, Pine Creek Road, Orosco Road, Wisecarver Road, and others.

---

Restricting vehicle access on National Forest System Roads to reduce fire risk falls outside the scope of this project. Alternative 2 would meet the purpose and need for the project by restoring damage caused by vehicles and preventing associated illegal activities. Public education and patrolling of National Forest System Roads by Law Enforcement, fire prevention, and other staff are the mechanisms for reducing fire risk associated with legal activity and also fall outside the scope of this project.

- 202) It's not clear from the EA whether this project would include vehicle barriers and signs to block unauthorized routes not shown on the project maps. Vehicle barriers and signs may be needed to block unauthorized routes not identified for decommissioning on the project maps. Is identification and authorization of all vehicle barrier locations needed as part of this project or does the CNF already have the authority from previous decisions to block unauthorized routes?

All proposed decommissioning under Alternative 2 is shown on project maps, and so there would be no barriers or signs installed for routes not shown. The only exception is for areas on the Trabuco Ranger District in and around the Wildomar OHV area, where the Wildomar OHV Management Plan EA and Decision Notice authorized similar decommissioning work.

- 203) TCLC supports the CNF proposed addition of several routes for non-motorized use but the project should include conditions to install vehicle barriers and other management measures as needed to prevent OHV access from authorized routes.

A camping spot on Pine Creek Road (14S05 – 6.6 1L-1) has a documented history of illegal campfire use and should not be added for public use without a fire season or drought closures of Pine Creek Road. Several additional unauthorized routes in the Mount Laguna area should be decommissioned including significant and harmful routes off of Deer Park Road, Indian Potrero / Pine Mountain Road, and Pine Creek Road (please see the attached map, kmz file available upon request). Several of these sites were brought to your attention by TCLC director David Hogan in early 2013 with subsequent site visits and mapping by CNF employee Russ LaJoie. Many of these unauthorized routes lead to high-fire risk problem spots with tossed cigarette ends, campfires, drug use, and target shooting. Trash dumping and dead-animal dumping has also been found at these sites. Additional unauthorized routes identified in the CNF route decommissioning ranking maps off Kitchen Creek Road should be decommissioned and/or blocked with vehicle barriers as needed: 15S17-.45L-1, 2, and 3, and the SDC – Kitchen Creek Road Spur.

Regarding 14S05-6.61L-1, see response to comment 201. Regarding sites not included in the project, the interdisciplinary team considered as many routes as possible given staffing constraints. Additional sites may be considered at a later time. Routes 15S17-.45L-1, 2, and 3 were found to have been effectively decommissioned already, while SDC – Kitchen Creek Road Spur was found to be naturally decommissioned, and so none of these were found to need further work under Alternative 2.

- 204) Project maps are unclear on what action is proposed for Sheephead unauthorized route 15S18 – SUA 1 or any portion of 15S18 past the end of the authorized route. These should be decommissioned and/or blocked with vehicle barriers as needed.

---

Alternative 2 would block vehicle access beyond the hang-gliding launch pad on Sheephead Road (15S18). 15S18-SUA-1 is not proposed for any action under Alternative 2.

- 205) An unauthorized route identified in the CNF route decommissioning ranking maps near the intersection of Bear Valley Road and Buckman Springs Road (UND 893) should be included in the project to be decommissioned and/or blocked with vehicle barriers as needed.

UND893 was found to be naturally decommissioned, requiring no work under Alternative 2.

- 206) TCLC strongly supports the proposed decommissioning of a harmful portion of Carveacre Road route 16S03 and unauthorized route 15S28 near Descanso.

This supportive comment is appreciated.

- 207) Unauthorized routes near Lost Valley and East Grade Road on the Palomar Ranger District should be included in the project to be decommissioned and/or blocked with vehicle barriers as needed.

Regarding sites not included in the project, the interdisciplinary team considered as many routes as possible given staffing constraints. Additional sites may be considered at a later time.

- 208) There are too many closures already. Not only is recreational access in need but emergency access is needed also. animal love to travel fire roads

See responses to comments 1, 3, and 5. While it is likely true that animals use unauthorized routes for travel, it is not clear that the decommissioning of routes would substantially impact their populations.

- 209) On p. 8 it is stated: "The vegetative restoration of routes with identified invasive species would be monitored annually for at least three years." This sounds like the revegetation would be done using invasive species--?? Suggested rewording: "Vegetative restoration will be monitored annually for at least three years, especially the routes along which invasive species were identified before decommissioning."

The requested clarification was made with similar language, but the monitoring was not extended to all routes, because the intent of the design feature is to minimize the spread of invasive plant species, which are not currently present on most routes.

- 210) Table 2 would be easier to follow if the districts' names were inserted as subtitles within the table, at the beginning of the portion of the list that covers that district.

This change was made to Table 2.

- 211) Sect. 3.2: Scientific as well as common names should be used here, if not throughout the EA.

Scientific names have been added for all species at their first mention, while common names are used throughout to accommodate a wider segment of the public than is familiar with scientific names.

- 212) Sect. 3.2.2 states that the Regional Forester's Sensitive Species List contains 7 sensitive plant species, but just 3 of them are listed in the lead paragraph. The other 4 should be mentioned here as well as in the detailed Direct and Indirect Effects of Alternative 2: Proposed Action. Or just mention that there are 7 such species in the lead paragraph and name them in the detailed Direct and ... Proposed Action.

Section 3.2.2 has been revised to include the names of the 10 sensitive plant species that potentially occur within the project area.

- 213) Sect. 3.2.3 states: "The project area contains potential habitat for 10 Management Indicator Species including 4 animal species- Mountain Lion, Mule Deer, Arroyo Toad, and Song Sparrow- and 6 plant species-Engelmann Oak, Big-cone Douglas Fir, Coulter Pine, California Spotted Owl, California Black Oak, and White Fir." But California Spotted Owls are not plants. What is the 6th indicator plant species?"

This error has been addressed. Section 3.2.3 now shows that the 10 Management Indicator Species are comprised of 5 animal species and 5 plant species.

- 214) In the meantime several worthwhile opportunities for dispersed camping are suggested for closure, at mile 10.1 and at mile 12 to name two significant ones. These need signage about no fires or littering, signs that can be replaced efficiently and often.

I took photos of the turnout at mile 12. The impacts from driving in are minimal. However the impacts from the county efforts to maintain the road are severe. The material used to fill in the road in the thousands of cubic yards of nonnative soil, dirt, and ground construction debris has washed through these side canyons and fill the bottoms of them. It is disappointing that the hydrologist did not recognize the nonnative soils and conditions of these washes. It has an appearance more like a desert wash than our native riparian areas and side streams. This was radically different before the county was dumping dirt on the sides of Boulder Creek Road. I feel that part of the problem with the road is being erroneously displaced, wag-the-dog fashion by this closure. The impacts there are from the county's misuse of authority in the forest and dumping nonnative dirt into the watershed. An enormously serious issue that off-roading did not cause. Additionally why close areas where there is dispersed camping only to open an area where the impacts are far greater? Absolutely every reason given in the FS documentation for decommissioning these routes is an issue for the ones they are suggesting creating.

The small pullout at mile 12 on Boulder Creek Road:

1. This pull out and short spur has been used for dispersed camping without further significant impact.
2. It seems contradictory to the stated purpose of this project to add the above recreational area with considerable issues in contrast to closing this simple segment that is not an issue requiring more than the usual patrol and management of fire and litter.

The small segment at mile 10.1 on Boulder Creek Road:

1. This pull out and short spur has been used for disbursed camping without further significant impact.
2. The creation of the pad next to this area, by the county was very damaging but has since been discontinued, please do not allow county grading and dumping on forest land.
3. This spur needs Fire and Litter signage.
4. It seems contradictory to the stated purpose of this project to add the above recreational area with considerable issues in contrast to closing this simple segment that is not an issue requiring more than the usual patrol and management of fire and litter.

The small segment to the lower pond at Richie Creek off of Eagle Peak Road. This was used for dispersed camping for years. This was closed in the former road closure about five years ago. It could be opened to provide the disbursed camping and seems odd that these areas are not utilized in favor of creating a new one that will be far more expensive to create and manage and does much more damage to wild places, habitat, and ecology of the region. This is not an acceptable trade off or mitigation.

See response to comment 137. These signage recommendations are appreciated and will be considered for signs throughout the Cleveland National Forest. San Diego County road maintenance practices are outside the scope of this project. Alternative 2 would not prohibit dispersed camping in the vicinity of decommissioned routes; instead, it would eliminate motorized access to these areas. The route that departs from Eagle Peak Road (13S06-5.2R1) enters lands zoned as Recommended Wilderness, where motorized vehicles are prohibited.

- 215) However I would add at this point, that there are some of these decommissioned unauthorized routes that I feel are a very good idea.

There are a number of unauthorized road additions in the area of Tule Springs that desperately do need closing. These are not available to the general public but apparently someone is getting in there and ripping up the ground anyway in order to off-road doing donuts in the chaparral, and / or to hunt for pigs. This closure is very much appreciated.

For legitimate access the USFS and its partners that maintenance guzzlers and administrative access is still via Dubois, Viejas, El Capitan Grade, and Tule Springs roads.

I feel that more consideration should have been given to the logistical comments made in how to secure these assess roads from illegal activity and the areas where we have observed the problematic logistics in keeping them secure; rather than automatically dismissing them. These comments are made to be effective and aide in saving money by being efficient and not having to do this all twice.

One of the most important closures in this document was the decommissioning of the road from below Inaja Memorial Park to the San Diego River. There has been considerable unauthorized off-roading in this area as well as unauthorized unpermitted cattle grazing the latter of which is doing enormous damage very near and in the river. I do appreciate all efforts to remedy this group of issues there.

I am particularly supportive and appreciative of the following components of this project:

1. The closure of the road below the Inaja Memorial Park into the Upper San Diego River. This is one of the most important in the Forest; however, it is also the result of considerable illegal and unpermitted grazing in the forest.
2. Decommissioning of a series of roads that were opened/created south of Tule Springs.
3. Decommissioning and securing of a series of unauthorized off-roading north of Tule Springs. However, more review of public comments in the logistics of accomplishing this should have been given a hard look before dismissing them.
4. Securing the overlook and prevention of unauthorized shooting at mile 15 on Boulder Creek Road.
5. My focus has been in the Eagle Peak area and at times around Barrett Lake. Therefore there are probably many heroic additions in this project that I was not able to review but doesn't imply one way or the other my thoughts on their significance or value.

These supportive comments are appreciated. Illegal grazing and target shooting enforcement fall outside the scope of this project. Public concerns about access to and activities within the Tule Springs area were carefully considered, not “automatically dismissed.” See responses to comments 19, 158, and 169.

- 216) Nevertheless, due to the uncommon issues around these added construction of roads on this project I would conclude that the best alternative for this project would be to recall the project. It is too large and goes in to many directions trying to accomplish all things to all people and becoming unwieldy and contradictory, if not confusing in the process. Please break it down into districts as much as possible and remove any suggest projects that are not directly decommissioning ones, especially the suggested recreation area and new road at mile 10.5 of Boulder Creek Road that require an EIS. Where these are to be evaluated they should be separate projects with a NEPA fully required EIS.

See response to comment 137. The scale of this project is intended to achieve efficiency and to increase the pace and scale of ecological restoration on the Cleveland National Forest. The No Action Alternative could be selected for any or all routes. The minor adjustments to the National Forest Road and Trail Systems would meet the purpose and need for the project (p. 2) and were incorporated into the project in response to internal and external scoping and survey findings.

- 217) Add liberal fire signage and littering signage throughout the forest. Provide patrols to these areas.

Provide responsive law enforcement so that the public can call in issues where they can be addressed and the public education improved. Neither county nor forest law enforcement has been readily available and responsive in the past to public complaints unless there was fire, or firearm danger. Neither has been effectively and consistently responding to complaints about destructive unauthorized off-roading allowing the issues to get worse before these sweeping projects become necessary. This one issue alone has brought considerable discontent and distrust among locals concerning the Boulder Creek Road issues because the Forest Service and the county are discounting their concerns about the traffic, dust, and noise, and mischief there. Doubling these problems will almost certainly compound these issues in communication. Locals are the eyes and ears of the Forest and the living verbal historical record of the Forest.

See responses to comments 53, 201, 214, and 215. Information from the public about issues on the Cleveland National Forest is greatly appreciated.

218) Additionally I want to emphasize my concerns for now the fourth project or component of one, actions by some in the resource team that are very unlike these foresters in my experience but nonetheless they occurred. I'm concerned and have seen what was the appearance of Forest employees either afraid to speak and act their hearts or bullied or bullying of other foresters. It is a perception. If I am correct that this project at mile 10.5 on Boulder Creek Road is in error of the NEPA process, and I'm very confident that it is, especially in the absence of reviewing it while it was flowing; then I much insist that these issues need to be researched a lot deeper. How does this happen, why, and moreover what can be done to put a stop to it and work more in the open?

See response to comment 137. This project has been conducted in an open manner, following NEPA regulations, which led to consideration of UND114 as a public road, followed by its removal.

219) I'm am crystal clear that there were "deals" and imperatives that transpired during the Sunrise Power link and before it. Imperatives to "find Access" regardless of the truth, of NEPA law, and possibly more serious laws, where profiting publically traded vendors operate on forest land, as well as public rights to a process. I'm personally convinced that much transpired between government officials, non discriptly politicians, the Local and regional Sierra club included a group called Beyond Coal, and a state think tank called RETI that was coordinated heavily by the Sierra Club energy advisor, Carl Zichella. Local members of the Cleveland National Forest referenced this same cooridore as one that was unofficially being held out for an expansion of the Sunrise Powerlink even though this was not documented before the public. Were they party to the above deals, forced, or bullied, or extorted, or bribed? We've come to a point in an apparent pattern where it is becoming necessary to ask these tough and difficult questions. I did not have any desire to write this, I had fully expected two letters, one on keeping Lawson Peak open and a page or two on the Eagle Peak area. Then the recreation area on Boulder Creek surfaced along with finding an enormous amount of nonnative dirt from county dirt dumping moving and choking out the surrounding watershed. There was one point during scoping of the LMP SEIS when it became rather clear that some of the same resource managers somehow had the impression that I was party and in conflict to whatever some apparent understanding or "deal" had occurred. I fully suspect this was in reference broadly to the moving of the Sunrise Powerlink out of the desert and into the south route. But Boulder Creek Road is not the South Route nor does it fall in the confines of the former FERC corridor. I'm crystal clear and rather validated by some resource managers months later that some direction on finding access routes in the area did in fact take place well before the forest supervisor was brought to this forest and now rendered moot by his turnaround decisions on these projects. That alone does not happen every day nor by very many with the courage to do so.

So why the continued focus here? I was never party to any arrangement between some enviros and government and SDG&E over Sunrise in the desert but it became distressingly apparent from sitting in the SEIS collaborative as well as the odd climate in our chapter at the

---

time, that some in the Sierra Club also took some pre-arranged communication for granted. I have my comments there and elsewhere.

To the unending credit of our Supervisor this rouse was pushed aside, the collaborative in stalemate prudently brought to a close, and genuine review finally did prevail. However it continues to have relevance and I am now establishing standing once again that some are not happy and this is in part a reaction to their deals of the past that we over road. I'm very, very proud of our Supervisor for choosing the integrous road in a long and embroiled battle, and moreover for having a moment to say I had a part in seeing that our lands would last as a result of knowing him. This latest recreational area is not his idea, not his fault. I know because the project manager made that rather clear he was only provided basic and general information. It isn't his fault. However... it does remain his responsibility to find and put an end to the dual Forest that has haunted this projects and bring them back under one authority, I can only hope and pray his. Acting on anything other than the integrity of the land, or this nation's democratic process, would to put it mildly, be most inappropriate.

This project is not connected in any way to San Diego Gas & Electric activities on the Cleveland National Forest, which fall outside its scope.

### **Cultural Resource Concerns**

- 220) The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseno people. This is to inform you, your identified location is not within the Luiseno Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

All Tribes within the project area were notified about this project for both the scoping and comment periods.

- 221) The San Diego County Archaeological Society believes that cultural resources need to be included in the analysis. While closing some routes may have favorable impacts to cultural sites located along any routes to be closed, and any unauthorized collecting at sites made accessible by those routes, it could also happen that the decommissioning activities themselves could result in adverse impacts. By including cultural resources in the analysis, such positive and negative impacts could be addressed.

Each unauthorized route proposed for decommissioning was surveyed by the Forest Archaeologist, and this EA includes the resultant cultural resource section for analysis of potential effects.

- 222) We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

---

All Tribes within the project area were notified about this project for both the scoping and comment periods.

223) This is an important project for avoiding impacts to cultural resources and, therefore, we support the efforts by Cleveland National Forest. As we noted in our letter of 14 March 2015, unauthorized roads hold a potential for both direct and indirect impacts to archaeological sites and other cultural sites. Obviously, vehicular traffic through any archaeological sites in their path can easily damage or destroy the resource. Beyond that, such roads can provide easy access to sites outside the route itself, thus facilitating pothunting and other forms of vandalism.

Other than ensuring that the methods that might be utilized to close access do not, in themselves, impact cultural resources, the Forest Service must ensure that any routes which are not or cannot be closed are not impacting sites. This may require surveys by an archaeologist meeting the Secretary of the Interior's standards.

See response to comment 221. In addition, all areas proposed for work under Alternative 2 were surveyed by an archaeologist meeting the Secretary of the Interior's standards, including routes that would be added to the National Forest Road or Trail Systems. Project design and design features would avoid impacts to archaeological resources and prevent further damage to them.

### **NEPA Process**

224) The time allotted for comments is far too short for public review and the maps are very hard to read and impossible to print full size.

The time period for scoping was within the ordinary range for a project of this sort. The new maps included in the Draft EA were developed in response to this concern for ease of use by the public.

225) Some of the concerns expressed to me include difficulties accessing information, both electronically and hard copy, as well as the public only being provided maps as opposed to specific route data, all coupled with an abbreviate amount of time for public review. Despite these challenges, it is my understanding that several user-groups have provided your office with information on specific closures where such action would impede access to existing conservation resources such as wildlife drinkers and guzzlers, as well as resources for hunters, dog-training, and other recreational activities.

See response to comment 224. The project leader swiftly assisted any member of the public that expressed difficulty accessing information. Public scoping does not require detailed information about the Proposed Action, which was not available at that time. It is true that many such user-groups provided scoping comments.

226) Appendix H is referred to under subheads S11 and S12 as the source of criteria for TEPCS design and conservation practices, but there is no Appendix H attached or linked to the scoping letter. A search for Appendix H in CNF's LMP (online PDF) found a reference to Part 3, which in turn contained 9 mentions of Appendix H but not the Appendix itself or indication of how it may be accessed. As a rule of clear writing, when reference is made to a

---

document or resource, a clear way to access it should be included. The same may be said re Appendix E, referred to under subhead S47.

Appendices E and H of the Cleveland National Forest Land Management Plan can be found on pages 65-66 and 71-75 of Part 3. A hard copy or CD may be requested of the Forest Planner, or the electronic file (in .pdf format) is available online at:

<http://www.fs.usda.gov/detail/cleveland/landmanagement/planning/>.

227) Some of your maps are not clear. There are status color coded routes on your grid but I could not tell what they implied.

New maps were developed for the Draft EA. The color coding of the scoping maps reflected a preliminary ranking of importance using GIS data for sensitive resources.

228) The Forest Service should focus on decommissioning virtually all of the unauthorized routes, and not acquiesce to permitting some illegal, unauthorized routes to continue being used. Stated another way, the basic objective of this project should be that all unauthorized will be decommissioned, to be consistent with the existing Forest Plan. Any exception to this position should be required to be justified as an enhancement to the existing Forest plan. The current “purpose” of this project is described in the 2/17/15 letter from the Supervisor as being “to decommission the highest priority unauthorized routes...”, which is much too weak, creates ambiguity as to what “priority” each illegal route is, and undermines a key provision of the existing plan.

It would be infeasible to include all unauthorized routes on the Cleveland National Forest in this analysis, and so prioritization of routes is essential. The Cleveland LMP does not preclude the addition of National Forest System Roads or Trails, and the Purpose and Need for the project was adjusted to reflect field discovery and line officer direction for where such additions were needed and acceptable. The Proposed Action does not permit any unauthorized routes to continue being used.

229) The authorized routes were established as part of the original plan, and all unauthorized routes are basically illegal.

Authorized routes were not established by the LMP. Instead, they were authorized by the Motorized Travel Management EA and Decision Notice of 2008.

230) To not decommission an unauthorized route is to encourage the continuing expansion of unauthorized routes. The message would be to some in the ORV community, that the way to get more routes is to create more unauthorized routes and then to be patient until the Forest Service basically accepts them.

There are multiple factors to consider for each particular unauthorized route beyond that of public communication. In some cases, routes decommission naturally; in others, decommissioning would require far greater investment than the resource benefit that would be gained. In still other cases, unauthorized routes are proposed for addition to the National Forest Road or Trail System. These factors were carefully weighed for each unauthorized route in the development of the Proposed Action.

---

231) The reality we have experienced historically, is that once an “accepted” route is established, there will be some users who will veer off into nearby areas and expand the routes.

The potential for exploratory vehicle use was considered in the development of the Proposed Action.

232) It is better to take a strong stance now and establish the precedent that unauthorized routes will not be tolerated, without amending the basic Forest Plan through a public process, than to postpone the hard decision until there are more unauthorized routes and the Forest Service has set a precedent that unauthorized routes can become permanent.

See response to comment 228. The Forest does not propose to amend the LMP through this project, since it is consistent with the LMP.

233) I recommend that CNF extend the duration of the subject process to arrange for a collaborative partnership with members of the local community of outdoor recreationists to objectively analyze the proposed road closure plan, while using appropriate maps, to insure a correct final disposition.

See response to comment 1. The Motorized Travel Management process of 2008 was the ripe time for the recreational users of the Cleveland National Forest to attempt to secure roads and trails for motorized use. This project primarily concerns the decommissioning of unauthorized routes with only minor adjustment of the National Forest Road and Trail Systems.

234) A quick way to facilitate the implementation of this approach would be for CNF to “reach-out-to” the San Diego County Wildlife Federation (SDCWF): a non-profit *amalgam* of local conservation-oriented clubs and organizations, as well as the local chapters of similar national organizations; which number in excess of twenty organizations with a combined constituency that stems from over 12,000 San Diego County households.

The Forest Service cannot provide any particular organization with special privileges outside the public process. The San Diego County Wildlife Federation and its members are welcome to provide input into project planning.

235) Boulder Creek Road is very problematic with the numbers of visitors to Three Sisters. This needs a cooperative Study / Solution with the County. My first priority would be to permit the Three Sisters trail since it is in a recommended wilderness.

This matter falls outside the scope of this project. A Draft Environmental Assessment is currently being prepared for Three Sisters Falls Recreation Management.

236) Your map should the trail leading from the Three Sisters Trail head which historically is called “The Turntable” –and I hope you keep the historical name—this trail is shown as being decommissioned. However your rangers park at the bottom of this saddle frequently. This should have a definitive decision. I would not get in the way of rescue usage or fire usage but routine should have a discussion and decision.

See response to comment 235.

237) In its place, I urge the Board to work with the community that enjoys and uses this area to create a program that will properly consider the entire environment, allow for more independent oversight, and incorporate the more natural science suitable for this regional environment.

This request falls outside the scope of the Purpose and Need for this project.

238) In Lakeland Village, we have a number of trails that date back to the 1930's. These trails are non-motorized. In recent years I have asked the Forest Service to choose one or more of these trails to encourage recreational activities in our area. My husband and I will help to maintain them. I was told we do not have walking trails into our beautiful forest from here.

See response to comment 237.

239) In the environmental analysis we would like a defined forest boundary with signage so that when we see homeless camping above our homes our citizens will know who to call.

See response to comment 237.

240) We would like the commission to authorize a trail from Lakeland Village into the forest.

See response to comment 237.

241) Multiple requests were received for extensions of the comment period due to the unavailability of the project website during the final three days of the comment period.

A three-day extension of the comment period was granted by the Forest Supervisor, and all who had requested an extension or sent electronic comments at any time about the project were notified of the extension.

242) P. 6, Hand Earthwork: should "wheel barrels" be "wheelbarrows"?

Yes. The change was made.

243) I have read your draft EA and have found it to be comprehensive, quite detailed, well thought out.

I did not see a prioritization plan. I suppose that that is not part of the draft EA format. I also did not find any implementation plan. I suppose that that is not part of the draft EA format either. However, given the fact that the Forest Service is acutely short of personnel and operating funds for projects outside fire prevention and suppression, I would expect that this plan as drafted will take many years to implement. (It has taken 10 years to get to this point from the initial 2005 Land Management Plan.) It seems to me that if this plan takes an extended length of time to actually implement (10 or 20 years), some of the findings and assumptions made in this EA report will become out of date and maybe even wrong. Then the actual implementation will be based on poor data and may lead to an unexpected challenge.

Hopefully, the Forest Service will be asking the Department of Agriculture for additional restricted funding for implementation. Additionally, I did see any reference where this EA will be referenced in any Forest Plan, which I believe is a USFS process that occurs every 20 years.

This supportive comment is appreciated. Implementation or prioritization plans are not required to be included in an EA. Funding to implement this work has been acquired for two initial phases, estimated to be completed over the next 3 years if Alternative 2 is selected. These two phases may not implement all authorized work, in which case additional funds would be sought. Should new information arise by the time implementation is scheduled, a Supplementary Information Report would be prepared to determine if additional NEPA compliance is needed. This EA will not be referenced in the Cleveland National Forest Land Management Plan; by contrast, it references the LMP and must be consistent with it.