



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

July 21, 2014

Mr. Joseph Adamson  
USDA Forest Service  
1400 Independence Ave. SW  
Washington, DC 20250-1125

**RE: Use by Over-Snow Vehicles (Travel Management Rule), Docket No. FS-2014-0004-0001**

Dear Mr. Adamson:

On behalf of our thirty-four member counties, the Rural County Representatives of California (RCRC) appreciates this opportunity to comment on the proposed Use by Over-Snow Vehicles amendment to the Travel Management Rule. Approximately one-third of California's one hundred million acres is forested, with a full one-fifth of the State's total acreage managed by the USDA Forest Service (USFS). More than seventy percent of the USFS land in California falls within the borders of RCRC's member counties. Management of those lands is of great importance to our rural communities and their locally-elected officials since the communities rely on forest lands for tourism and recreation revenues as other economic opportunities have diminished in forested counties.

While RCRC acknowledges that the USFS is proposing the amendment to comply with the Idaho District Court ruling, we would like to express our concerns about how any new Travel Management Plan (TMP) requirements will be implemented by forest supervisors in individual national forests. As you may know, communication between forests and the counties in which they are located is highly inconsistent, particularly in a large state like California. The autonomy offered to forest supervisors has created a situation where some forests are extremely open to input from counties, while others are less forthcoming and, at times, completely unsympathetic to county concerns. This inconsistency is extremely frustrating for counties, especially those whose communities depend on recreational access on the national forest for its economic value.

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To address these issues, RCRC recommends the USFS issue guidance to its forest supervisors on coordination and communication with counties when implementing the final amendment. Recent history has shown that forest and travel management planning at the forest level work better with proper coordination with the impacted counties. A new rule closing access for snowmobiles could exacerbate already-strained communications between counties and forests over TMPs. Guidance on county coordination and communication when implementing the new amendment would help alleviate at least some of those issues, and perhaps open a line of communication between forests and rural counties.

We thank you for your attention to our comments, and look forward to working with the USFS on travel management issues in the future. Please contact me if you have questions or would like to discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", written in a cursive style.

STACI HEATON  
Regulatory Affairs Advocate

cc: RCRC Board of Directors