

Richard Gienger  
[rgrocks@humboldt.net](mailto:rgrocks@humboldt.net)  
Box 283, Whitethorn  
California 95589  
707-923-2931  
fax: 923-4210  
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Board of Forestry  
1416 Ninth Street  
Sacramento  
California 95814

**Comments RE: 2006 Road Management Plan rules proposal  
(15-Day Notice version set for hearing on 11.8.06)**

Dear Board:

I would like the applicable past comments I have made on all three RMP rules packages (2004, 2005, & 2006) apply to this latest 15-Day Notice version. I support the detailed criticisms of this package from Sharon Duggan for EPIC and from Brian Gaffney for the Sierra Club.

For some years now, the Board has failed to come up with a credible, high quality Road Management Plan rules package that would stand on its own in terms of design, review, implementation, monitoring, and adaptive management. Such a package would actually provide the kind of process that would dramatically reduce the adverse impacts from roads, as well as give incentives for better forestland planning and management -- especially if such a package had standards that would allow for project tiering. If such a high standard package was applicable for broader applications, and the state offered various cost shares, personnel, and material to aid in design and implementation there would be a significant incentive for quality RMPs across the state -- especially for smaller landowners. Large landowners are usually more capable of responding to legacy road problems than smaller landowners, and a quality RMP with needs driven cost shares would really begin to meet the intent of water quality, wildlife protection, and forestry laws and regulations in California.

It was very disappointing that the Board backed off its most promising approach for an RMP -- to have an RMP with it's own functional equivalent process -- fearing the dreaded complexity of a legislative component. It was a chance to come up with something closer to what I describe above as possible.

Please deny this latest version, get a new start, and produce something that you can be proud of for generations to come. You have plenty of valid guidance available to you.

Please apply long-term intelligence and will. The above is written on behalf of the Environmental Protection Information Center (EPIC), the Humboldt Watershed Council (HWC), and myself.

Sincerely,

Richard Gienger