

Hello Eric,

As you heard at this week's Road Rules Workshop, Board Member Britting requested that I submit CFA's remaining concerns with the Road Rules definitions to the Forest Practice Committee for their review prior to the August Board meeting. I have included those concerns below. Please forward them to the Board's Forest Practice Committee.

**CFA concern with Road Rules definitions:**

CFA provided the Board with concerns with the road rules package when this package was originally noticed by the Board. This letter was dated February 23, 2012. Our concerns specific to the road definitions included (from page 1 of our comment letter):

*Definitions: Abandoned, Deactivated and Temporary Roads* These definitions are clumsy, confusing, and contradictory (e.g., abandoned roads are removed from Permanent Road Network, yet the Temporary roads include abandoned roads, that are part of the Permanent Road Network). Later in the actual rules, "abandoned" seems to be interchangeable with "deactivated" (e.g., blocking "abandoned" roads.) Abandoned and deactivated roads need to be clarified, along with the applicable road maintenance/closure specifications later in the subsequent rules section

From the latest rule plead (July 23, 2013), I copied the new definitions below:

**Temporary Road** means a logging road that is to be used only during the timber operations and that will be deactivated or abandoned upon completion of use.

**Deactivated Road** means a logging road that is part of the permanent road network where measures have been implemented to prevent active use by logging trucks and standard production four-wheel drive highway vehicles.

**Abandoned Road** means a logging road on which proactive measures have been applied to effectively remove it from the permanent road network.

**Permanent Road Network** means the permanent, seasonal, and temporary, and deactivated roads, including appurtenant roads, that provide the infrastructure necessary for timber operations and forest management.

Our issue: If Temporary Roads are abandoned, and if Abandoned Roads are removed from the permanent road network, how can Temporary Roads be included in the Permanent Road Network? This seems somewhat contradictory. Also, given the definitions above, it is not totally apparent when a road is "Deactivated" or "Abandoned", even given the recent changes to 923.8 (d) where these activities are described in further detail.

Given the confusion that exists relative to road classifications under our current rules, we hope that the Forest Practice Committee can possibly clarify some of these new and revised definitions.

Thank you for your consideration in this matter.

Ed

*Ed Struffenegger,  
CFA Consultant  
13090 Trent Court  
Jackson, CA 95642*

*(209) 296-1396 home  
(209) 304-2045 cell*

[eelstr1@volcano.net](mailto:eelstr1@volcano.net) or  
[edstruff@volcano.net](mailto:edstruff@volcano.net)