



NATIONAL FOREST HOMEOWNERS

" To ensure continued enjoyment of forest homes"

May 9, 2011

USDA Forest Service
Forest Service Planning DEIS
C/O Bear West Company
132 E 500 S
Bountiful, UT 84010

By facsimile transmission: 801-397-1605

Re: 2011 Draft Forest Planning Rule

As President of National Forest Homeowners which represents owners, and their friends and family, of over 14,000 cabins in the Recreation Residence Program established under the Organic Administration Act of 1897 and the Term Permit Act of 1915, I am pleased to present these comments regarding the 2011 Draft Forest Planning Rule. Our members rely on the NFH to act in their best interest when it comes to issues related to the continuance of the program.

Due to our belief in multiple-use and the recognition of historic use, National Forest Homeowners requests that the Recreation Residence Program be noted explicitly in the Rule as a successful example of how recreation and the National Forests can indeed have a symbiotic relationship, one that has stood the test of time and manifold challenges. Historically, this program has brought generation after generation of families, friends and communities together to enjoy the many forms of recreation available on the national forests and wild lands, and the goal should be to have this and many other access programs continue unhindered and to have the budget dollars of the Forest Service used to enhance those experiences, not for lawsuits.

While we are pleased that the Forest Service recognizes that recreation plays an important role in the future of the National Forests, we have concerns about the cumbersome language and processes contained in this proposed Rule. For a document that is supposed to create attainable goals at an affordable standard, and hopefully to mitigate future litigation,

Geoffrey Anderson

President

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it contains contentious language and political and legal challenges appear certain.

The Proposed Rule does not appear to support the charge given the Forest Service under the Multiple-Use Sustained-Yield Act of 1960 and the National Forest Management Act. We are concerned about the clear overemphasis of preservation above Multiple Use: there is a binding requirement that there be ecological sustainability but only a requirement that social/economic sustainability be a contribution. This leaves recreation essentially trumped by all other aspects of the Proposed Rule.

We have seen at least one occasion when the existence of a historic cabin tract has been threatened by a ranger who would not have allowed the cabins near a creek if the decision was being made today. There was no evidence of any ecological damage, just a belief that cabins do not belong near water.

When a special use permit allowing the maintenance of a cabin in the National Forest expires, the Forest Service requires an examination of the Forest Plan to determine whether the use is "consistent" with that Plan in order to determine whether a new term permit may be issued. Without some specific reference to the validity of this use we fear that more emphasis may be placed in too many instances on scenic easements and land restoration to a natural and native state than on the value of an existing historic recreational use. The addition of language in the Proposed Rule that confirms the legitimacy of this recreation residence use in the balancing act of land management of our National Forests would help to keep the focus more properly on the items that might need to be mitigated to maintain the forest environment. Our cabin owners all care deeply about the forest environment around our cabins and throughout the forest, and historically have worked in partnership with Forest Service staff to maintain that environment. That belief was present when the Forest Service re-stated its position on recreation residences as a "valid" use in the 1994 Policy. The proposed new Forest Planning Rule should continue that approach.

Thank you for the opportunity to comment on the Proposed Rule. We sincerely hope that you will make specific mention of the cabin program in the rule as a traditional and justified use, to prevent the demise of a valuable program under the rubric of preserving the forests.

Very truly yours,

Geoffrey Anderson
President
National Forest Homeowners