



Via Federal eRulemaking Portal

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September 23, 2026

Jim Bacon
Acting Director, Public Benefits
201 14th Street SW
Public Benefits Office
Washington, DC 20250

Re: Docket Number FS-2026-0100 - Travel Management; National Forest System Lands

Dear Acting Director Bacon:

The California Farm Bureau appreciates the opportunity to comment on the United States Forest Service's (Forest Service) Notice of Intent to prepare an environmental impact statement (EIS) and rulemaking to revise the Forest Service's travel management regulations, 36CFR part 212.

California Farm Bureau is California's largest farm organization, comprised of 54 county Farm Bureaus currently representing approximately 23,000 agricultural, associate, and collegiate members in 57 counties. As an organization, we strive to improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable food and fiber supply through responsible stewardship of California's resources.

California Farm Bureau's members live and work among National Forest system lands with many members engaging in public lands forestry and ranching activities. These farming and ranching families will be directly impacted by proposed revisions to the Travel Management Rule. California Farm Bureau generally supports the proposal's emphasis on increasing access to National Forest System lands, streamlining and modernizing processes, and empowering local officials to make decisions based on site-specific conditions and community needs. As the Forest Service works to finalize a rule and EIS, we also offer the following specific comments for consideration:

Increased Wildfire Risk and Emergency Response

The proposed rule appropriately recognizes the growing impacts of extreme wildfire, drought, and changing forest conditions. We strongly agree that the Forest Service should carefully evaluate how changes to road and trail access could affect wildfire risk, fire prevention, and emergency response. Any expansion of public access should account for the potential for increased human-caused ignitions, the ability to conduct fire suppression, and the need to maintain access for emergency personnel. The agency should also consider whether additional roads and routes could increase fire response challenges, particularly in areas experiencing heightened wildfire risk. We urge the Forest Service to incorporate wildfire risk assessments and emergency response considerations into site-specific access decisions.

Costs and Long-Term Maintenance

The proposal appropriately recognizes maintenance capacity and available appropriations as relevant considerations in determining an adequate and appropriate forest transportation system. California Farm Bureau agrees that increasing access to National Forest System lands should factor both financial and operational resources required to construct, maintain, repair, and manage roads and trails.

Currently, the Forest Service administers 380,000 miles of roads and 165,000 miles of trails. We urge the Forest Service to evaluate the full lifecycle costs of opening additional roads and routes, including funding availability for wildfire emergencies. The Forest Service should ensure that access decisions do not create transportation infrastructure obligations that exceed available funding or compromise the maintenance of existing roads that are essential to forest management and permitted uses.

Maintaining and Improving Access for Agricultural Multiple Uses

California Farm Bureau strongly encourages the Forest Service to retain and improve access for agricultural multiple use, including forestry activities and livestock grazing, in any travel management reforms as these operations critically rely on National Forest System roads and trails to manage their operations. For example, access for grazing permittees is often essential for livestock monitoring, moving animals, maintaining range improvements, accessing water sources, and responding to emergencies. Additionally, changes to road status or seasonal access can have significant operational consequences.

The final rule and EIS should explicitly recognize the importance of maintaining reliable, practical access for agricultural multiple uses. It should also establish processes that allow timely consideration of their operational needs. In summary, improving access should include supporting the individuals and businesses that have longstanding, authorized uses of National Forest System lands.

Sustainable Transportation Systems for Agricultural Multiple Uses

We appreciate the proposal's emphasis on multiple-use management as well as the proposal identifying conflicts among uses as a factor that may justify restrictions or closures. We agree that decisions regarding access should consider the cumulative demands placed on transportation infrastructure and whether existing systems can safely accommodate increased use. We urge the Forest Service to consider road conditions and structural capacity, seasonal limitations, and current traffic volumes and safety. These considerations should be applied consistently at the local level.

As the Forest Service considers interactions between use types, we urge special attention on increased motorized vehicle access near livestock operations, including safety concerns, disturbance to livestock, damage to range improvements, and conflicts along shared roads and trails. While California Farm Bureau is generally supportive of enhanced public access, it is essential that National Forest System lands maintain safe and workable conditions for foresters and livestock permittees.

Accommodation for Existing Initiatives

The Modoc National Forest in California has prepared a draft Supplemental Environmental Impact Statement (SEIS) to address deficiencies identified during the appeal review of the 2009 Modoc Travel Management Record of Decision (ROD). Currently, the Forest is prepared to finalize the SEIS and issue a ROD to update the Modoc Motor Vehicle Use Maps. However, it has been unable to do so due to the administrative pause to Travel Management planning implemented in January 2025. As a result, the Travel Modoc National Management Plan for the Modoc National Forest remains incomplete and legally unenforceable.

The draft SEIS is consistent with the proposal's desire to increase access as it would add routes that were eliminated from the original decision and resolve critical infrastructure/access needs for local stakeholders including ranchers, hunters, and off highway vehicle recreationalists. The changes will also enhance visitor motor vehicle access, established through years of stakeholder and community engagement, and support publishing of an enforceable Motor Vehicle Use Map.

We urge the Forest Service to allow Modoc National Forest, and any other Forests in a similar position, to proceed with the proposed action so that the incomplete Travel Management Plan can be finalized. Completing the SEIS aligns with the administration's direction on expanding public access and supporting rural economies.

Localized, Enhanced Decision Making

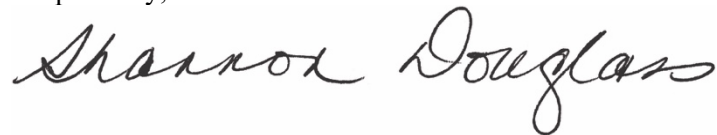
California Farm Bureau supports the proposal's emphasis on enhanced, localized decision making based on current conditions and management needs. Local forest managers are often best positioned to understand the unique resource conditions, transportation challenges, and community needs within their jurisdictions. However, with this approach, we strongly urge the Forest Service to ensure adequate staffing so that travel management reforms are adequately resourced.

With this approach, we also urge the Forest Service to pursue processes that enable timely decisions, clear standards, documented analysis and opportunities for affected agricultural multiple use operations to provide meaningful input. Agricultural operators routinely working on National Forest System lands often possess valuable knowledge and their participation can help Forest Service personnel identify practical solutions and anticipate unintended consequences.

Conclusion

The California Farm Bureau appreciates the Forest Service's proposal to modernize Forest Service travel management regulations and the intent to improve access to National Forest System lands. As the Forest Service works to finalize a regulation, we urge consideration of increased fire risk, maintenance considerations, and impacts on agricultural multiple use access. Thank you for your consideration of these comments and for your work managing our nation's forests. If questions, please contact Erin Huston (ehuston@cbbf.com).

Respectfully,

A handwritten signature in black ink that reads "Shannon Douglas". The signature is written in a cursive, flowing style.

SHANNON DOUGLASS
President