



October 5, 2016

Objection Reviewing Officer  
USDA Forest Service, Pacific Southwest Region  
1323 Club Drive  
Vallejo, CA 94592

Re: Lassen OSV Designation Objection

Pursuant to 36 C.F.R. part 218, Friends of Plumas Wilderness (Objector) file this objection to the Lassen National Forest Over-Snow Vehicle Use Designation draft Record of Decision (draft ROD). Formal notice of the objection period was published in the newspaper of record on August 23, 2016, initiating a 45-day objection period ending on October 7, 2016, making this objection timely. The Responsible Official is Russell Hays, Lassen National Forest Supervisor. The name of the proposed project is the Lassen National Forest Over-Snow Vehicle Use Designation. The implementation area is the Lassen national Forest.

The Objector filed timely, specific comments regarding the Draft Environmental Impact Statement (DEIS) for the Lassen Over-snow Vehicle Use Designation on March 9, 2016, and therefore has standing to object per 36 C.F.R. § 218.5(a).

Friends of Plumas Wilderness is a 501(c)3 non-profit organization dedicated to studying, exploring and maintaining the integrity of natural ecosystems of the Northern Sierra and Southern Cascades. Friends of Plumas Wilderness supports Lassen National Forest's efforts to designate Over-Snow Vehicle (OSV) use areas and trails. We share the Lassen National Forest OSV planning goal to provide a manageable, designated system of public OSV trails and areas within the Forest that is consistent with and achieves the purposes of the Forest Service Travel Management Regulations. Unfortunately, we feel that the draft ROD falls short of achieving this goal.

Our primary concerns with the Draft Record of Decision are: 1) it does not abide by the 2015 OSV Planning Rule to manage the Forest as closed to OSV use unless designated as open; and, 2) it does not minimize conflicts between user groups in the McGowan Lake Area.

**The Lassen Draft ROD doesn't follow the 2015 OSV "closed unless designated open" Planning Rule**

The Objector raised this issue in our comments on the DEIS. We stated, "The Lassen National Forest does not meet the intent of the Forest Service Travel Management Regulations as the approach taken on the Lassen is to manage the entire forest as open to OSV use unless specifically designated closed. Under the 2005 Travel Management Rule, Off Highway Vehicle routes and areas on public lands are managed as "closed unless designated open." Likewise, the 2015 Over-Snow Vehicle Rule requires the Forest Service to manage its lands as closed to OSV use unless designated and marked open on an over-snow vehicle use map. This requirement necessitates that the Forest Service identify discrete areas where OSV use is allowed, but the Lassen National Forest has failed to identify such areas thus far.

Furthermore, in our comments we stated that "Management of OSV use as closed unless designated open will require much less education, monitoring and law enforcement, especially if discrete areas open to OSVs are delineated with easily identifiable boundaries such as ridgelines, roads and rivers."

The Selected Alternative, like all Alternatives analyzed, identifies areas where OSV use is prohibited (i.e., not designated as open) and designates the rest of the Forest (78%) open for OSV use essentially by default and without delineating discrete open areas that are located to minimize adverse impacts and conflicts with other recreational uses, as required. The Final Environmental Impact Statement repeatedly describes why areas are closed to OSV use. However, the draft Record of Decision does not describe how boundaries of areas open to OSV use were determined. This violates the 2015 OSV Rule.

Friends of Plumas Wilderness object that the Lassen National Forest does not comply with the 2015 OSV Rule to manage Forest land as "closed unless marked open."

**Remedy:** Amend the FEIS and draft ROD to describe how areas open to OSV use were determined to comply with the 2015 Over-snow Vehicle Rule and re-draw boundaries as necessary to delineate discrete areas.

**The Draft ROD does not minimize conflict between users in the McGowan Lake Area**

The Objector raised this issue in our comments to the DEIS. We stated that, "The minimization criteria... require the Forest Service, when designating routes and areas open to motorized travel, to: 1) minimize damage to soil, watershed, vegetation, or other resources of the public lands; 2) minimize harassment of wildlife or significant disruption of wildlife habitats; and 3) minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands."

In our comments to the DEIS we stated, "The McGowan Lake Area is a popular destination for quiet winter sports enthusiasts as the road to the high elevation trailhead is well maintained year-round. The area provides five miles of cross-country ski trails, snowshoeing opportunities and access for backcountry winter camping. Friends of Plumas Wilderness supports Alternative 3 as it restricts OSV use on 9,940 acres in this popular non-motorized winter use area. Prohibiting OSV use in the McGowan Lake Area west of State Highway 89 and north of State Highway 36 will provide easily identifiable boundaries that separate motorized and non-motorized uses, thus reducing conflict between user groups."

Page 13 of the draft ROD includes the statement: "The objective of minimizing conflicts between OSV recreationists and non-motorized recreation enthusiasts will be addressed by not designating the 4,570-acre area near McGowan Lake for cross-country OSV use. This area surrounds a popular non-motorized trail and it will provide additional non-motorized cross-country opportunities, offer additional

opportunities for solitude, and will provide an additional non-motorized buffer near Lassen Volcanic National Park (FEIS, page 141; ROD figure1, page3).”

There is little demand or need for OSV use in the McGowan Lake Area as the trailhead does not adequately accommodate snowmobile access and the Morgan Summit OSV Area provides opportunities for motorized winter recreation nearby. Allowing OSV use on Forest Service road 30N16 will “impact the amount of available opportunities for public access and use of National Forest System lands by non-motorized winter recreation enthusiasts seeking solitude and challenging physical experiences,” a significant issue identified in the OSV Use Designation process. Alternative 3 of the DEIS delineated 9,940-acre non-motorized area around the McGowan ski trails to protect the non-motorized experience that many visitors seek in this area. The Selected Alternative does not protect historic non-motorized winter recreation opportunities in the McGowan Lake Area.

Encouraging OSV use in the McGowan Lake Area does not meet the objective of minimizing “conflicts between motor vehicle use and existing or proposed recreational uses of NFS land or neighboring federal lands” as stated in the Draft Record of Decision and violates the minimization criteria outlined in the 2015 OSV Planning Rule.

Friends of Plumas Wilderness object to the designation of any part of Forest Service road 30N16 for OSV use. This road has historically been designated for winter non-motorized recreation and managed for cross-country skiing. The Lassen 2005 Winter Recreation Map shows Forest Service road 30N16 as a cross-country ski trail and closed to motor vehicles. The draft ROD Selected Alternative Map (figure 1, page 3) shows Forest Road 30N16 as a National Forest System Non-Motorized Trail and the area west of State Highway 89 and north of State Highway 36 as NFS Areas not designated for Cross-country OSV Use.

Friends of Plumas Wilderness object that the Selected Alternative compromises existing opportunities for non-motorized recreation in the McGowan Lake Area. To minimize conflict between motorized and non-motorized winter visitors, we recommend expanding the no OSV area to include the area north of State Highway 36 and west of State Highway 89 in the McGowan Lake Area.

**Remedies:** The final Record of Decision should not designate Forest Service road 30N16 for OSV use. The final Record of Decision should include the 9,940-acre McGowan OSV closure area described in Alternative 3 of the DEIS.

Thank you for your consideration of the objections detailed above. I will attend the objection resolution meeting on October 13, 2016 and hope that we can remedy the objections stated above.

Sincerely,



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