



October 2, 2019

Randy Moore, Regional Forester
USDA Forest Service, Pacific Southwest Region
Attn: Plumas National Forest Over-Snow Vehicle (OSV) Use Designation #47124
1323 Club Drive
Vallejo, CA 94592

Re: Plumas OSV Objection

Dear Regional Forester Moore,

Friends of Plumas Wilderness (Objector) file this objection to the Plumas National Forest Over-Snow Vehicle Use Designation Draft Record of Decision (Draft ROD). Formal notice of the objection period was published in the Feather River Bulletin on August 21, 2019, initiating a 45-day objection period ending on October 5, 2019, making this objection timely. The Responsible Official is Christopher Carlton, Forest Supervisor of the Plumas National Forest. The name of the proposed project is the Plumas National Forest Over-Snow Vehicle Use Designation. The implementation area is the Plumas National Forest.

The Objector filed timely, specific comments on November 17, 2015 regarding Scoping and to the Draft Environmental Impact Statement (EIS) for the Plumas Over-snow Vehicle Use Designation on January 23, 2019 and therefore has standing to object per 36 C.F.R. § 218.5(a).

Please accept these objections on behalf of Friends of Plumas Wilderness. 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 Plumas National Forest's efforts to designate snow areas and trails for public over-snow vehicle use. We share the Plumas National Forest OSV planning goals to provide access, promote safety of all users, minimize impacts to natural and cultural resources, minimize conflicts between OSV use and other recreational uses, minimize conflicts between different vehicle classes, and manage OSV use in accordance with County General Plans.

Friends of Plumas Wilderness commends the Plumas National Forest on progress that has been made to address issues that our organization raised during Scoping and in response to comments we made to the Draft EIS. We

strongly support locations where the Draft ROD restricts OSV use in Threatened, Endangered, and Sensitive species (TES) habitat, Inventoried Roadless Areas (IRA), Semi-Primitive Areas (Rx-8), Research Natural Areas (RNA), Special Interest Areas (SIA), and areas of high value for non-motorized winter recreation.

Aspects of the Plumas National Forest Final Environmental Impact Statement and Draft Record of Decision that Friends of Plumas Wilderness object to include:

- 1) Expanding OSV grooming and concentrating OSV use within Threatened, Endangered and Sensitive species habitat, specifically in Sierra Nevada yellow-legged frog Critical Habitat Subunit 1B
- 2) Expanding OSV grooming and concentrating OSV use adjacent to the Bucks Lake Wilderness
- 3) Designating OSV use in Inventoried Roadless Areas and Citizen-inventoried Roadless Areas
- 4) Designating OSV use in along the Lost Sierra Traverse in Florentine Canyon
- 5) Designating OSV use adjacent to the Pacific Crest Trail, specifically between 22N60 and the Wild Section of the Middle Fork Feather River

Below we provide background information, objections, and resolutions regarding each of the areas listed above.

1) THREATENED, ENDANGERED, SENSITIVE SPECIES HABITAT AND OSV USE DESIGNATIONS

Friends of Plumas Wilderness supports Plumas National Forest's efforts to protect Threatened, Endangered, and Sensitive Species habitat. We commend the Forest Service for not designating and/or restricting OSV use to roads in low elevation big game winter habitat, bald eagle nesting areas, and portions of the federally Endangered Sierra Nevada yellow-legged frog Critical Habitat Subunit 1D in the La Porte OSV Use Area along Slate Creek and west of Mt. Fillmore, and in Subunit 2B in Lakes Basin OSV Use Area adjacent to Gold Lake.

In the Lakes Basin Area, the Plumas National Forest acknowledges that "The presence of groomed trails in this area may increase over-snow vehicle use over time and thereby increase the risk of localized habitat degradation caused by, in part, increased soil erosion, sedimentation, and noise disturbance" (OSV Use Designation FEIS, Volume II, Appendix I, p.57). We are concerned that expanding OSV grooming on Primary Forest Route 33, west of the Bucks Lake Wilderness, may encourage OSV use and increase the risk of localized habitat degradation in Sierra Nevada yellow-legged frog Critical Habitat Subunit 1B. Furthermore, we are concerned that concentrating OSV use in lower-elevation areas around Meadow Valley will increase erosion, sedimentation, and noise disturbance to the Sierra Nevada yellow-legged frog.

Objection 1A: Extending OSV use on Forest Road 24N33 in Sierra Nevada yellow-legged frog Critical Habitat

Friends of Plumas Wilderness objects to extending OSV grooming on Forest Road 24N33 beyond Chuck's Rock. Expanding grooming here will likely increase over-snow vehicle use on Cape, Mud, and Blue Lakes and thereby increase the risk of localized habitat degradation to Sierra Nevada yellow-legged frog habitat caused by increased soil erosion, sedimentation, and noise impacts. Likewise, extending grooming of Forest Road 24N33 will likely increase OSV use in the vicinity of Bald Eagle and Bucks Mountains and have negative impacts on California spotted owl Protected Activity Centers and northern goshawk nesting sites.

Remedy 1A: Extend OSV grooming in areas that are not Critical Habitat for Threatened & Endangered Species

If the Plumas National Forest wishes to enhance motorized winter recreation opportunities by increasing the extent of grooming operations, we encourage the Forest Service to expand OSV grooming in areas that do not have Threatened, Endangered, and Sensitive species. In areas where there are known Threatened, Endangered, and Sensitive Species, we recommend only allowing OSV use on designated routes. To protect Endangered Sierra Nevada yellow-legged frogs in Critical Habitat Subunit 1B, we recommend that the Forest Service not extend grooming of Primary Forest Route 33 beyond Chuck's Rock to 24N89X and 24N89XA.

Objection 1B: Designating OSV use in Sierra Nevada yellow-legged frog Critical Habitat in Meadow Valley

Friends of Plumas Wilderness objects to changes the Plumas National Forest made in the ROD adding "OSV use designations for several National Forest System parcels near the Meadow Valley near NFS road 24N03A and included NFS road 24N29X (Silver Lake Road)..." (Draft ROD Plumas National Forest Over-Snow Vehicle Use

Designation, p. 8). The concentration of ungroomed trails proposed to be open to OSV use in this low-elevation area may increase use over time within Critical Habitat Subunit 1B and thereby increase the risk of localized habitat degradation caused by, in part, increased soil erosion, sedimentation, and noise disturbance.

Remedy 1B: Designate OSV use on Snake Lake Road rather than Silver Lake Road

Designating OSV use on the Snake Lake Road, rather than the Silver Lake Road, will provide a corridor for OSV riders to access motorized areas north of Critical Habitat Subunit 1B in the Meadow Valley area. The Snake Lake Road provides access to areas open for OSV use north of Meadow Valley outside of Sierra Nevada yellow-legged frog Critical Habitat Subunit 1B. The paved Snake Lake Road is confined between Wapunsie Creek and an extremely steep, densely vegetated slope above the road which prevents off-trail OSV travel until OSV riders are north of Subunit 1B. Because the Snake Lake Road is paved, it will reduce the likelihood of habitat degradation caused by increase soil erosion and sedimentation created when OSVs travel across insufficiently deep snow on unpaved roads.

2) OSV USE DESIGNATIONS ADJACENT TO THE BUCKS LAKE WILDERNESS

Friends of Plumas Wilderness was formed by concerned citizens in 1974 who stopped proposed logging in the area that is now the Bucks Lake Wilderness. Between 1974 and 1984 our grassroots group worked with state and national conservation organizations to motivate Congress to designate the Bucks Lake Wilderness. It was no small feat. At that time, the Plumas National Forest Supervisor and all Plumas County Supervisors favored logging the area and were opposed to designation of the Wilderness. Today, most Plumas County residents see our one, small Wilderness as a valuable asset with enduring environmental, social, and economic values.

The FEIS states that “Areas adjacent to the Bucks Lake Wilderness and Plumas-Eureka State Park would not be designated for OSV use” (Plumas OSV Use Designation FEIS, Volume I, p. 29). Friends of Plumas Wilderness appreciates that “To accommodate current use patterns and reduce potential for conflicts between motorized and non-motorized recreation areas within the Black Gulch area between the eastern boundary of the Bucks Lake Wilderness and Silver Lake Road, south of Silver Lake and north of Bucks Lake Road would not be designated for OSV use” (Plumas OSV FEIS pp. 29-30). However, our organization has concerns about proposed changes in OSV management made between the Draft EIS and the Draft ROD in areas adjacent to the Bucks Lake Wilderness as they may encourage and concentrate OSV use adjacent to the Wilderness, increase noise levels within the Wilderness, and increase the frequency of motorized trespass into the Wilderness.

We do not buy the argument that extending OSV grooming beyond Chuck’s Rock to the intersection of 24N89X and 24N89XA “will help ensure that motorized use is directed away from the wilderness, thus reducing conflicts between motorized and non-motorized users...” (Plumas OSV Use Designation FEIS, Volume III, Appendix I, p. 80). To the contrary, we believe that extending grooming operations on 24N33 to the intersection with 24N89X and 24N89XA will increase OSV use to Bald Eagle Peak and in the Cape Lake Basin. We are concerned that with increased motorized use, there will be more noise within the Bucks Lake Wilderness. We also think extending grooming operations on the west side of the Wilderness will increase, rather than reduce, the frequency of OSV trespass into the Wilderness.

We are concerned that if the Silver Lake Road is designated as the only OSV route to access open motorized areas north of Meadow Valley, OSV use will be concentrated along the Silver Lake Road, adjacent to the Bucks Lake Wilderness. The Silver Lake Road currently receives little OSV use, as prior to OSV use designation there were multiple roads open to snowmobiling from Meadow Valley, there are two developed OSV Staging Areas just up the road at Big Creek and Bucks Summit, and there is limited parking space available. Parking at the intersection of the Silver Lake Road (24N29X) and Bucks Lake Road (State Highway 162) is inadequate for trailers to turn around. Backing trailers into 24N29X requires that vehicles stop on Bucks Lake Road, which creates a hazard to vehicles traveling along the State Highway. Concentrating OSV use on the east side of the Wilderness will increase noise impacts and degrade the high quality non-motorized winter recreation opportunities currently available in the Bucks Lake Wilderness.

Allowing OSV use on the Silver Lake Road may encourage snowmobiles to trespass into the Bucks Lake Wilderness and ride on Silver Lake. Historically OSVs have not trespassed into the east side of the Bucks Lake Wilderness, but if the Silver Lake Road is the only route available for snowmobiles to access open areas north of Meadow Valley, there may be more OSV trespass into the Wilderness here. Areas of concern include the ridge between Jacks Meadow Creek and Silver Lake, and Fales Basin, north of Silver Lake. In the past, riding OSVs on Silver Lake has caused safety and environmental concerns. During the winter of 2006, a snowmobile riding across Silver Lake broke through the ice and sank. When the Meadow Valley Fire Department attempted to recover the snow machine, the “rescuer” broke through the ice and sank another snowmobile.

It is unfortunate that representatives from Friends of Plumas Wilderness were not invited to present our concerns when last minute discussions and decisions were being made with OSV riders and skiers regarding OSV use designation in the vicinity of the Bucks Lake Wilderness. Friends of Plumas Wilderness has been advocating for the protection of the Bucks Lake Wilderness since our organization’s inception in 1974. We hope that a representative from our organization is at the table when future management decisions that may impact the Bucks Lake Wilderness are made.

Objection 2A: Expanding OSV use adjacent to the Bucks Lake Wilderness on Forest Road 24N33

Friends of Plumas Wilderness objects to the proposal to expand OSV grooming operations on the west side of the Bucks Lake Wilderness. Doing so will likely increase OSV use, increase the number of incidents of motorized trespass into the Wilderness, and increase the amount of time motorized vehicles can be heard in the Wilderness.

Remedy 2A: Do not extend OSV grooming operations on the west side of the Bucks Lake Wilderness

We recommend that OSV grooming operations not be extended along the western side of the Bucks Lake Wilderness. If Chuck’s Rock does not provide a sufficient area to safely turn around grooming equipment, we recommend that grooming terminate at the intersection of 24N33 and the road to the Mill Creek Campground or at another location closer to Bucks Lake.

Objection 2B: Concentrating OSV use adjacent to the Bucks Lake Wilderness on Forest Road 24N29X

Friends of Plumas Wilderness objects to revisions to the Final EIS that propose OSV use on Silver Lake Road (24N29X). The eastern portion of the Bucks Lake Wilderness has the highest value non-motorized winter recreation opportunities remaining on the Plumas National Forest. Concentrating OSV use on the Silver Lake Road will compromise the last, best place for backcountry skiing on the Plumas National Forest. If winter motorized use is encouraged on both sides of the Wilderness, snowmobiles will be heard throughout the Bucks Lake Wilderness.

Remedy 2B: Designate OSV use on Snake Lake Road rather than Silver Lake Road

To reduce the possibility of trespass into the eastern portion of the Bucks Lake Wilderness and on to Silver Lake, we recommend that the Silver Lake Road not be designated for OSV use. The paved Snake Lake Road, which is plowed to the Plumas County Shooting Range, provides much safer access to open OSV areas north of Meadow Valley. The Snake Lake Road is a spur off of State Highway 162 and the terminus at the Shooting Range has a large area adequate for turning vehicles around.

3) OSV USE AND Rx-8 AREAS, INVENTORIED ROADLESS AREAS, AND CITIZEN-INVENTORIED ROADLESS AREAS

In 1986, Friends of Plumas Wilderness created a Conservationist Alternative for the Plumas National Forest Land & Resource Management Plan. The Conservationist Alternative delineated roadless areas we sought to keep non-motorized using administrative prescriptions (Backcountry) and congressional designations (Wilderness). The 1986 Conservationist Alternative can be viewed on the Quincy Library Group website at <http://qlg.org/pub/archive/archivemisc/fpwconalt.htm>. Friends of Plumas Wilderness used the 1979 Roadless Area Review and Evaluation (RARE II) boundaries as a foundation for our Conservationist Alternative areas, as the RARE II areas met the definition of wilderness as per section 2(c) of the 1964 Wilderness Act.

The 1988 Plumas National Forest Land & Resource Management Plan (LRMP) identified Semi-Primitive (Rx-8) areas. “This prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area” and applies to 79,500 acres of the Plumas National Forest (1988 Plumas LRMP p. 4-88). “Most semi-primitive areas overlap with RARE II areas, but do not share identical designated boundaries” (Plumas OSV Use Designation FEIS, Volume I, Ch. 2, p. 30). Friends of Plumas Wilderness appreciates that some Semi-Primitive areas (Bald Rock, Grizzly Peak, Middle Fork, and Thompson Peak, Chips Creek; and portions of Beartrap, Keddie Ridge, and Lakes Basin) were not designated for OSV use.

The 2001 Roadless Area Conservation Rule identified Inventoried Roadless Areas (IRA) based on site-specific analysis and public involvement. The Roadless Rule fundamentally changed the Forest Service’s approach to management of inventoried roadless areas by establishing nationwide prohibitions generally limiting timber harvest, road construction, and road reconstruction. These nationally-applied prohibitions superseded the management prescriptions for inventoried roadless areas applied through the development of individual land management plans (http://www.thewflc.org/news_pdf/138_pdf.pdf).

Friends of Plumas Wilderness appreciates that the 2001 Roadless Area Conservation Rule provides national protections for roadless areas, as prior to that time, motorized winter use had been promoted in Semi-Primitive areas on the Plumas National Forest, such as Lakes Basin. In the winter time, much of the Lakes Basin area no longer meets the description as “essentially undisturbed areas” that “maintain a remote forest setting and allow non-motorized, dispersed recreation.” Due to winter motorized recreation and summer mechanized recreation that had been allowed to occur in the Lakes Basin area prior to the 2001 Roadless Area Conservation Rule, this area no longer meets the definition of wilderness as per section 2(c) of the 1964 Wilderness Act.

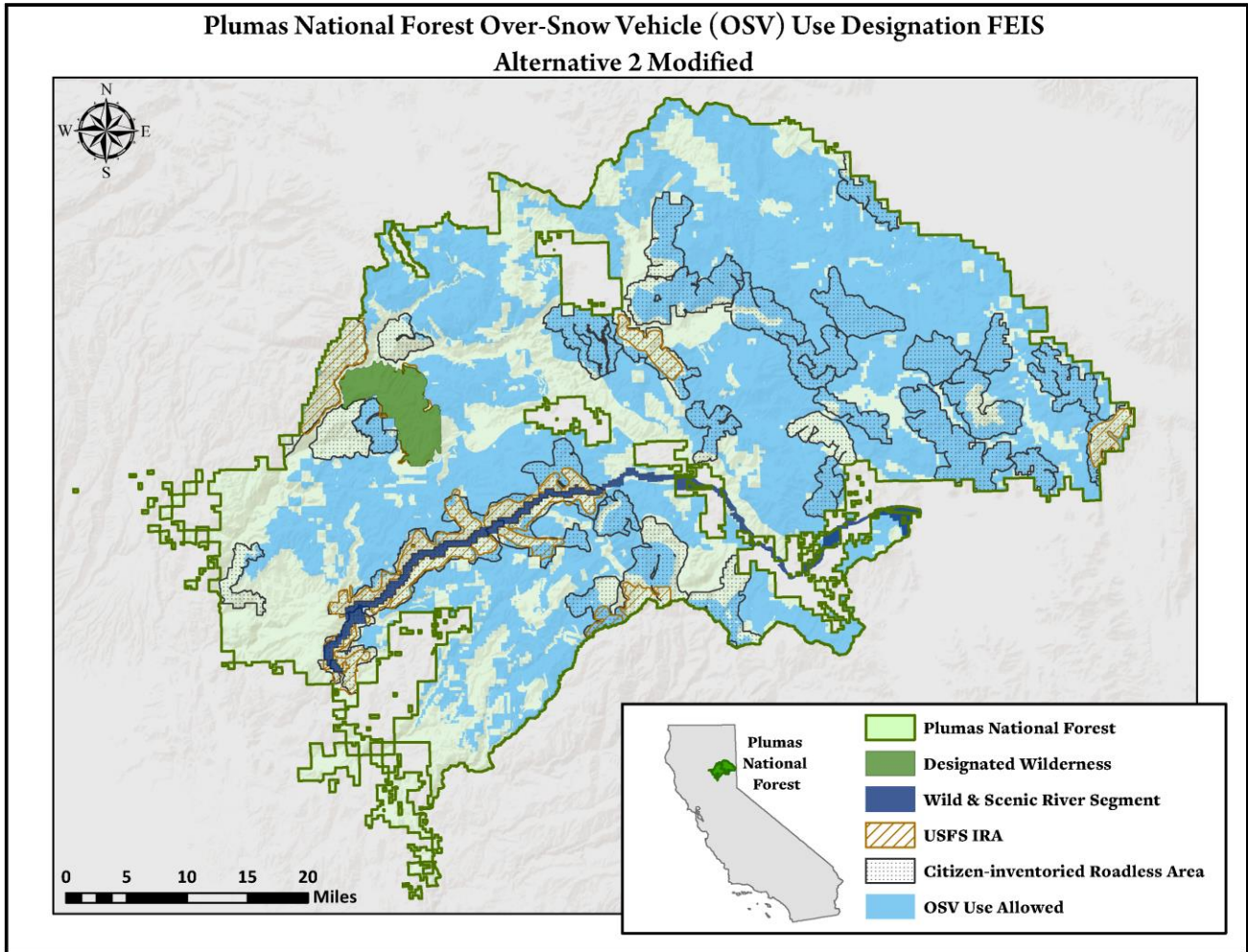
The Plumas OSV FEIS states that “Some inventoried roadless areas (Adams Peak, Keddie Ridge, Bald Rock, and Lakes Basin; portions of Chips Creek, Grizzly Peak, Middle Fork, West Yuba, and Bucks Lake) were not designated for OSV use. In cases [where] semi-primitive areas overlap with RARE II or 2001 Inventoried Roadless Areas, the semi-primitive area was not designated for OSV use to minimize effects to the semi-primitive nature of Rx-8. Inventoried Roadless Areas can often take pressure off heavily used wilderness areas by providing solitude and quiet, dispersed recreation opportunities. In general, IRAs were not designated for OSV use” (Plumas OSV Use Designation Vol. I, Ch. 2, p. 30). Friends of Plumas Wilderness appreciates that most IRAs were not designated for OSV use and agrees that IRAs can provide quiet and solitude, yet our understanding of the 2001 Roadless Area Conservation Rule is that national 2001 IRAs superseded the forest-level management prescriptions. To meet minimization criteria required for Travel Management Subpart C, the Plumas National Forest should use the 2001 Roadless Area Conservation Rule boundaries in addition to the 1988 FLMP Semi-Primitive (Rx-8) boundaries, rather than use the Rx-8 areas in place of 2001 IRAs.

In 2017, our organization worked closely with The Wilderness Society to provide an up-to-date inventory of Citizen-inventoried Roadless Areas (C-IRA) on the Plumas National Forest. The survey used Wilderness standards outlined in Chapter 70 of the 2012 Forest Service Planning Rule. Roadless area boundaries were ground-checked for accuracy. After updating roadless area surveys on the Plumas National Forest, Friends of Plumas Wilderness collaborated with The Wilderness Society, The California Wilderness Coalition, and local conservation groups to prioritize areas our allied organizations will advocate for Congress to designate as Wilderness.

Our prioritized list of Citizen-inventoried Roadless Areas that are eligible for Wilderness designation includes:

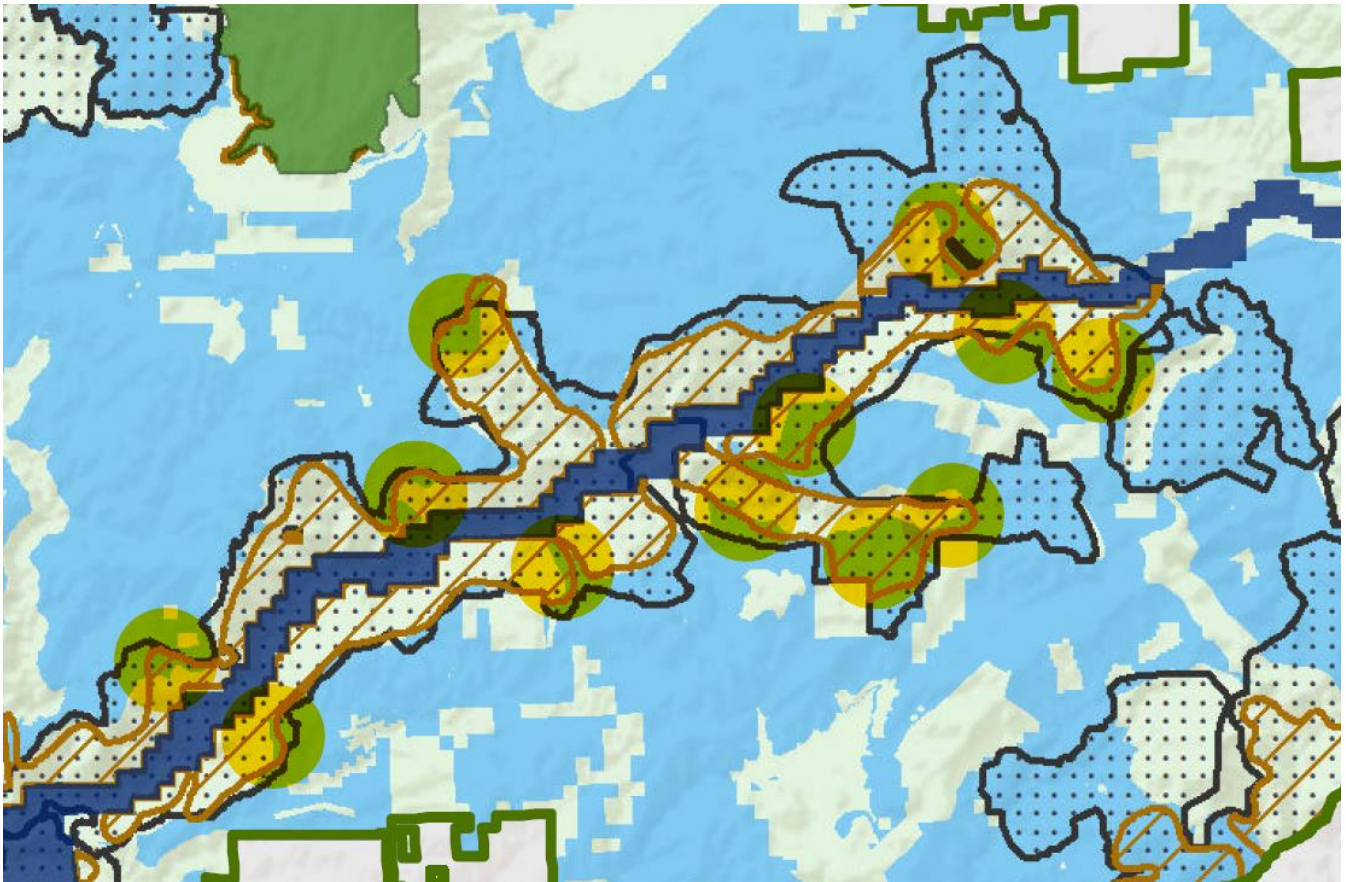
- 1) Feather River – 57,900 acres surrounding the Bald Rock IRA, Middle Fork IRA, and Dixon Creek Rx-8
- 2) Chips Creek – 15,600 acres including the Chips Creek IRA
- 3) Grizzly Peak – 11,716 acres surrounding the Grizzly Peak IRA
- 4) Adams Peak – 7,764 acres surrounding the Adams Peak IRA
- 5) Bucks Creek – 10,400 acres adjoining the Bucks Lake Wilderness

Friends of Plumas Wilderness commends the Plumas National Forest for changes made between the DEIS and FEIS to not designate OSV use in the Chips Creek and Bucks Creek Areas. These areas are of no use to OSV riders yet are of high value to non-motorized visitors year-round. However, we are adamantly opposed to the Plumas Draft ROD designating OSV use in portions of the Middle Fork Inventoried Roadless Area, and Grizzly Peak and Adams Peak Citizen-inventoried Roadless Areas.



The map above, created by The Wilderness Society, shows that under Alternative 2 Modified, OSV use is allowed on over 200,000 acres of Citizen-inventoried Roadless Areas.

Closer inspection of the map reveals that OSV use is allowed on over 7,000 acres of 2001 Inventoried Roadless Areas. In fact, OSV use is allowed on over 6,300 acres in the Middle Fork IRA, the area local, state, and national conservation groups identified as our top priority for Wilderness protection. The Middle Fork Feather River below Red Bridge consists of a steep canyons that are densely timbered and are of no value to OSV enthusiasts, yet the low elevation canyons provide outstanding opportunities for solitude and unconfined, human-powered recreation. Several eligible Wild Rivers (Dixon Creek, McCarthy Creek, Onion Valley Creek, Bear Creek, and Little North Fork of the Middle Fork) are located within or adjacent to the Middle Fork IRA.



Under Alternative 2 Modified, OSV use is proposed on over 6,300 acres of the Middle Fork IRA. Areas where OSV use is proposed within the Middle Fork IRA are highlighted in yellow.

Because the OSV Use Designation process is occurring before the revision of the Plumas National Forest Land & Resource Management Plan, conservation organizations are concerned that areas which meet the definition of Wilderness, as outlined in Chapter 70 of the 2012 Planning Rule, will not be considered eligible for Wilderness protection if OSV use has been designated in these areas. On the other hand, if areas on the Plumas National Forest are designated as Wilderness where OSV use has been deemed appropriate by the current winter travel planning effort, it will unnecessarily create conflict between motorized and non-motorized winter visitors. Therefore, we strongly encourage the Plumas National Forest to include the Feather River, Grizzly Peak, and Adams Peak Citizen-inventoried Roadless Areas during the OSV Use Designation process.

Objection 3A: The Plumas National Forest did not consider 2001 IRAs to determine areas not open to OSVs

Friends of Plumas Wilderness strongly objects to the Plumas National Forest not using national 2001 Inventoried Roadless Area mapping data to determine areas not designated for OSV use.

Remedy 3A: Use 2001 IRA boundaries in addition to Rx-8 Prescription to determine areas not open to OSVs

Friends of Plumas Wilderness urges that the Plumas National Forest use nationally held data delineating 2001 Inventoried Roadless Area boundaries in addition to forest level data from the 1988 LRMP. Using IRA boundaries will better meet minimization criteria required by Travel Management Subpart C.

Objection 3B: OSV use designation in the Middle Fork IRA and Citizen-inventoried Roadless Areas (C-IRA)

Friends of Plumas Wilderness objects to designating OSV use in the Middle Fork Inventoried Roadless Area, Dixon Creek Semi-Primitive Area, and Citizen-inventoried Roadless Areas.

Remedy 3B: Not designate OSV use in Middle Fork IRA and portions of C-IRA that receive no OSV use

Do not designate OSV use in the Middle Fork IRA or do not designate OSV use in portions of Citizen-inventoried Roadless Areas that receive no OSV use. Friends of Plumas Wilderness and allied conservation groups identified the Middle Fork of the Feather River as our highest priority area for Wilderness protection on the Plumas National Forest. We have provided 7.5-minute USGS maps showing our proposed Wilderness boundary to the Plumas National Forest staff. These maps were used in Alternative 5 of the DEIS.

The proposed Feather River Wilderness consists of three units within the canyons of the Middle Fork of the Feather River and Nelson Creek. The proposed Wilderness encompasses the Bald Rock and Middle Fork Inventoried Roadless Areas and Rx-8 areas, the Dixon Creek Rx-8 area, and additional Citizen-inventoried Roadless Areas. The three units independently meet Wilderness designation criteria: being over 5,000 acres in size, having a predominantly natural character, and providing opportunities for solitude and primitive, unconfined recreation.

The upper elevations of the proposed boundary are typically located on the canyon rim. If roads have been constructed within the watershed, the boundary is below the canyon rim. Regardless, areas within the proposed Wilderness are extremely steep and timbered and of no value to OSV riders.

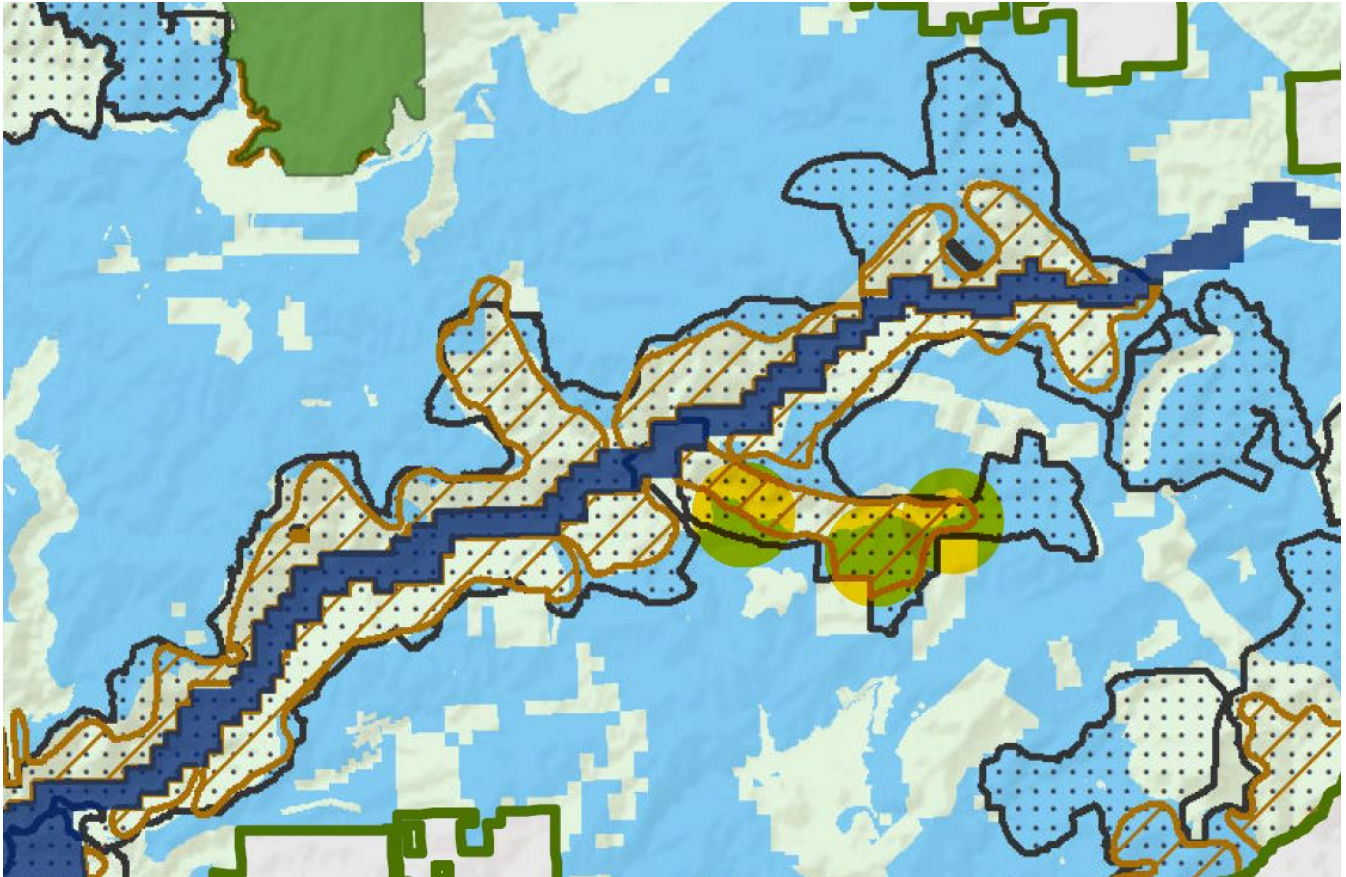
Onion Valley, Dogwood, and Fowler Creeks

The headwaters of Onion Valley Creek were home to the first documented ski races in the Americas and were a popular backcountry ski destination from the mid 1970's to the late 1980's. With the development of OSV infrastructure in upper Onion Valley, backcountry skiers were displaced and today the upper canyon is a popular OSV destination.

In our comments for the Draft EIS we proposed "not designating the portion of Onion Valley west of Placer Diggings, as well as Last Chance, Sawmill Tom, and Washington Creeks" (OSV Use Designation FEIS Volume III, Appendix I, p. 35). In response to our proposal, the Plumas National Forest states: "the portion of Onion Valley that is west of Placer Diggings is adjacent to a groomed OSV route, and would likely invite conflict where it doesn't exist now if OSV use was prohibited in that area" (OSV Use Designation FEIS Volume III, Appendix I, p. 35).

We acknowledge that the portion of Onion Valley that is immediately west of Placer Diggings is adjacent to a groomed OSV route and although the terrain north of the OSV route is extremely steep and densely vegetated, we concede if OSV use were prohibited in that area it may increase conflict. We agree to advocate for OSV use in portions of the Citizen-inventoried Roadless Area if these places are currently used by snowmobiles. However, we strongly object to designating OSV use in any portion of the Middle Fork Inventoried Roadless Area.

Upper Dogwood Creek and Fowler Creeks are within the Citizen-inventoried Roadless Area yet were not referenced in the Final EIS. These drainages are extremely steep and densely timbered, are a long distance from groomed OSV routes, and receive no OSV use. We recommend not designating OSV use in Dogwood and Fowler Creeks northwest of the Fowler Lake Special Interest Area, southeast of the Middle Fork Feather River, and north of 22N72 and 22N74Y. Not designating OSV use in the Citizen-inventoried Middle Fork Roadless Area and the adjoining Fowler Lake Special Interest Area would protect ecological and wilderness values, preserve the non-motorized character of the Pacific Crest Trail, and not adversely impact OSV riders.

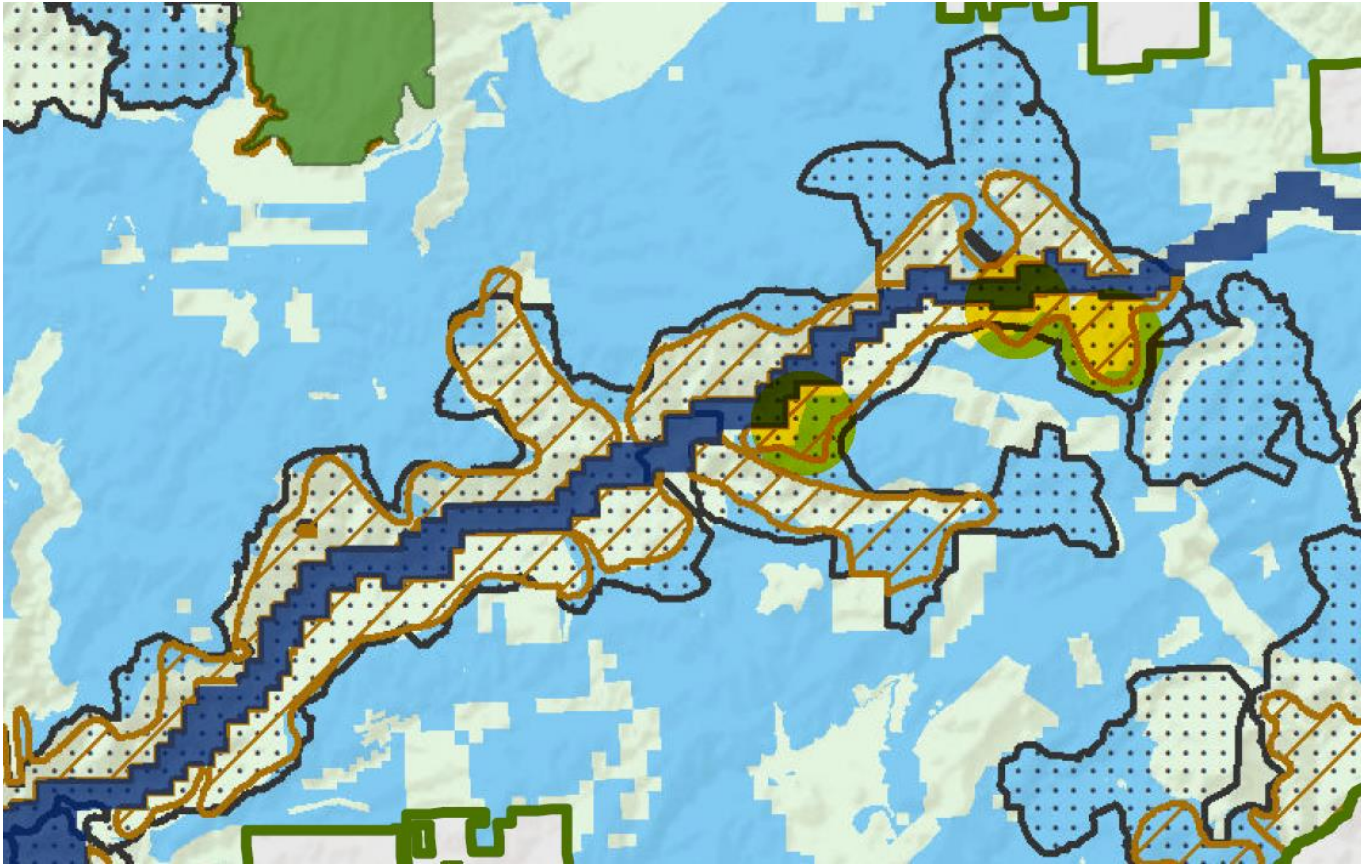


Areas where OSV use is proposed under Alternative 2 Modified within the Middle Fork IRA on Onion Valley Creek are highlighted in yellow.

Last Chance, Sawmill Tom, and Washington Creeks

The Last Chance, Sawmill Tom, and Washington Creek drainages are extremely steep and densely timbered and therefore are not used by OSVs riders. The FEIS states: “Last Chance, Sawmill Tom, and Washington Creeks were already partially excluded from OSV use in the DEIS inside of the wild and scenic OSV closure of the Middle Fork of the Feather River, and the Middle Fork Semi-Primitive Area prescription (Rx-8)” (OSV Use Designation FEIS Volume III, Appendix I, p. 35). We understand this and appreciate that OSV use was not designated in the majority of Rx-8 prescriptions to protect the semi-primitive and non-motorized characteristics; however, we are adamantly opposed to OSV use designation within the Middle Fork IRA and in portions of Citizen-inventoried Roadless Areas which receive no OSV use.

We recommend not designating OSV use along Last Chance and Sawmill Tom Creeks south of the McCarthy Creek eligible Wild River segment, north of the Cleghorn Bar Road (9M28), west of 23N66Y, and north of 23N24. This remedy will enhance non-motorized winter recreation opportunities and not diminish winter motorized recreation opportunities in the area. We recommend not designating OSV Use along Washington Creek south of the Wild section of the Feather River, west of 23M52X, north of private lands, and east of 23N62Y. Likewise, this remedy would protect wilderness values and not adversely impact OSV users.

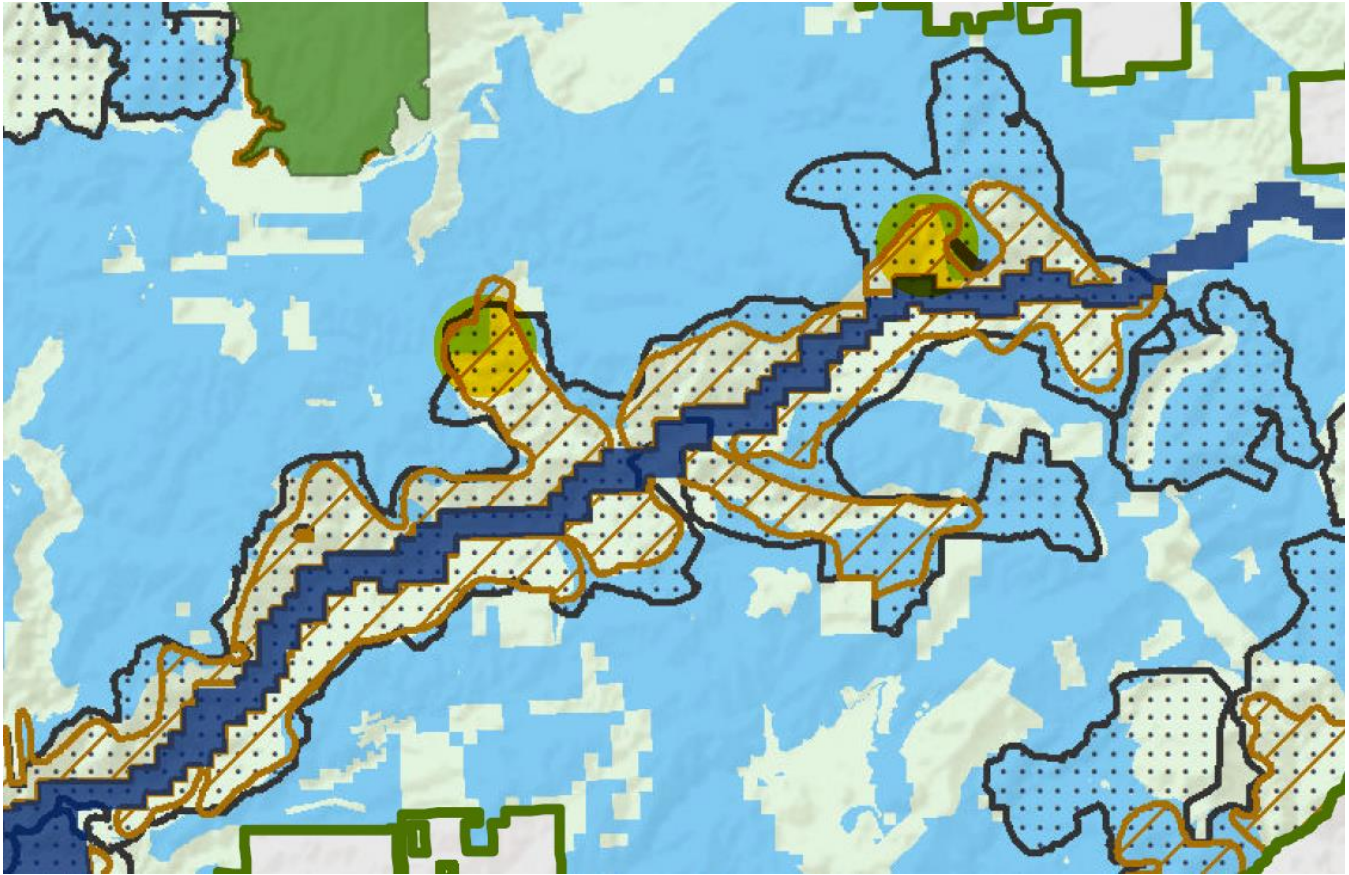


Areas where OSV use is proposed under Alternative 2 Modified within the Middle Fork IRA in the vicinity of Last Chance, Sawmill Tom, and Washington Creeks are highlighted in yellow.

Bear Creek, Grizzly Creek, and Crescent Hill

The Final EIS references the area around Lookout Rock and states that “prohibiting OSV use in this area would likely create conflict since there are numerous groomed trails and existing OSV use in the area surrounding Lookout Rock” (OSV Use Designation FEIS Volume III, Appendix I, p. 80). To the contrary, OSV use does not “surround” Lookout Rock. Due to the extremely steep topography and dense vegetation, no OSV use occurs east of Lookout Rock. Sheer cliffs prohibit OSV access. Only in places where roads have been bulldozed into McFarland Ravine, several miles north of Lookout Rock, can OSVs negotiate the terrain.

We recommend not designating OSV use in the Middle Fork IRA along Bear Creek, west of the eligible Bear Creek Wild River segment to 23N60, and south of 23N06X to the proposed no OSV area. This remedy would maintain high quality OSV use along and west of the groomed route while protecting wilderness values and preserving the character of the Pacific Crest Trail. Similarly, we suggest not designating OSV use in the Middle Fork IRA below Crescent Hill. We also recommend not designating OSV use in Citizen-inventoried Roadless Area along upper Grizzly Creek northwest of the Feather River, southwest of 23N99, and southeast of 24N28. This remedy would protect wilderness values and not adversely impact OSV users.

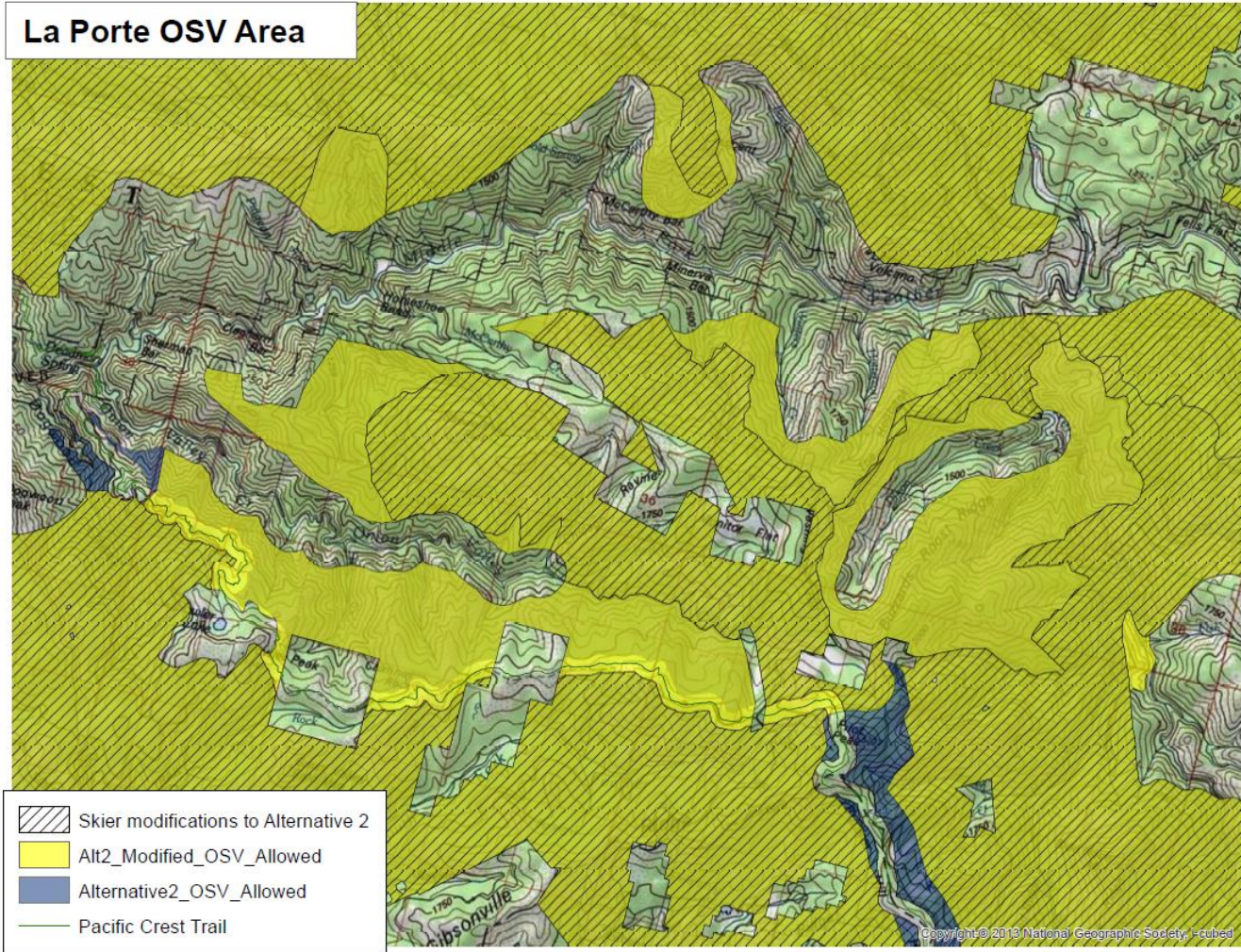


Areas where OSV use is proposed under Alternative 2 Modified within the Middle Fork IRA on Bear Creek, by Lookout Rock, and below Crescent Hill are highlighted in yellow.

Dixon Creek / Buzzards Roost Ridge

The FEIS states that “Some semi-primitive areas (Bald Rock, Dixon Creek, Grizzly Peak, Middle Fork, and Thompson Peak; portions of Beartrap, Chips Creek, Keddie Ridge, and Lakes Basin) were not designated for OSV use” (Plumas OSV FEIS Vol. I, Ch. 2, p. 30). However, the only portion of the Dixon Creek Semi-Primitive area not designated for OSV use is the eligible Wild River segment of Dixon Creek. With the exception of an illegal, user-created OHV route to the top of the Buzzards Roost, the Dixon Creek/Buzzards Roost Ridge Rx-8 area is non-motorized. The vast majority of the area is extremely steep and densely timbered and is not conducive to OSV riding. The description of Rx-8 states “this prescription applies to essentially undisturbed areas to maintain the remote forest setting and allow non-motorized, dispersed recreation. Activities permitted only if they are unobtrusive and maintain the character of the area. This prescription applies to the following roadless areas: Bald Rock, Beartrap, Chips Creek, Dixon Creek, Grizzly Ridge, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak (PNF LRMP, p. 4-88). General direction includes “provide a non-motorized experience (1a)” and standards and guidelines state “allow no motorized travel except over-the-snow and management access” (PNF LRMP, p. 4-88). Because the only OSV use within the Dixon Creek/Buzzards Roost Ridge area is to the top of the Buzzards Roost, we recommend not designating OSV use in the Semi-Primitive Non-Motorized area, except to the top of the Buzzards Roost.

La Porte OSV Area



Citizen-inventoried Roadless Areas in the LaPorte OSV Area, including the Dixon Creek Semi-Primitive Area (Rx-8) on the right, north of Pilot Peak, and south of the Middle Fork Feather River.

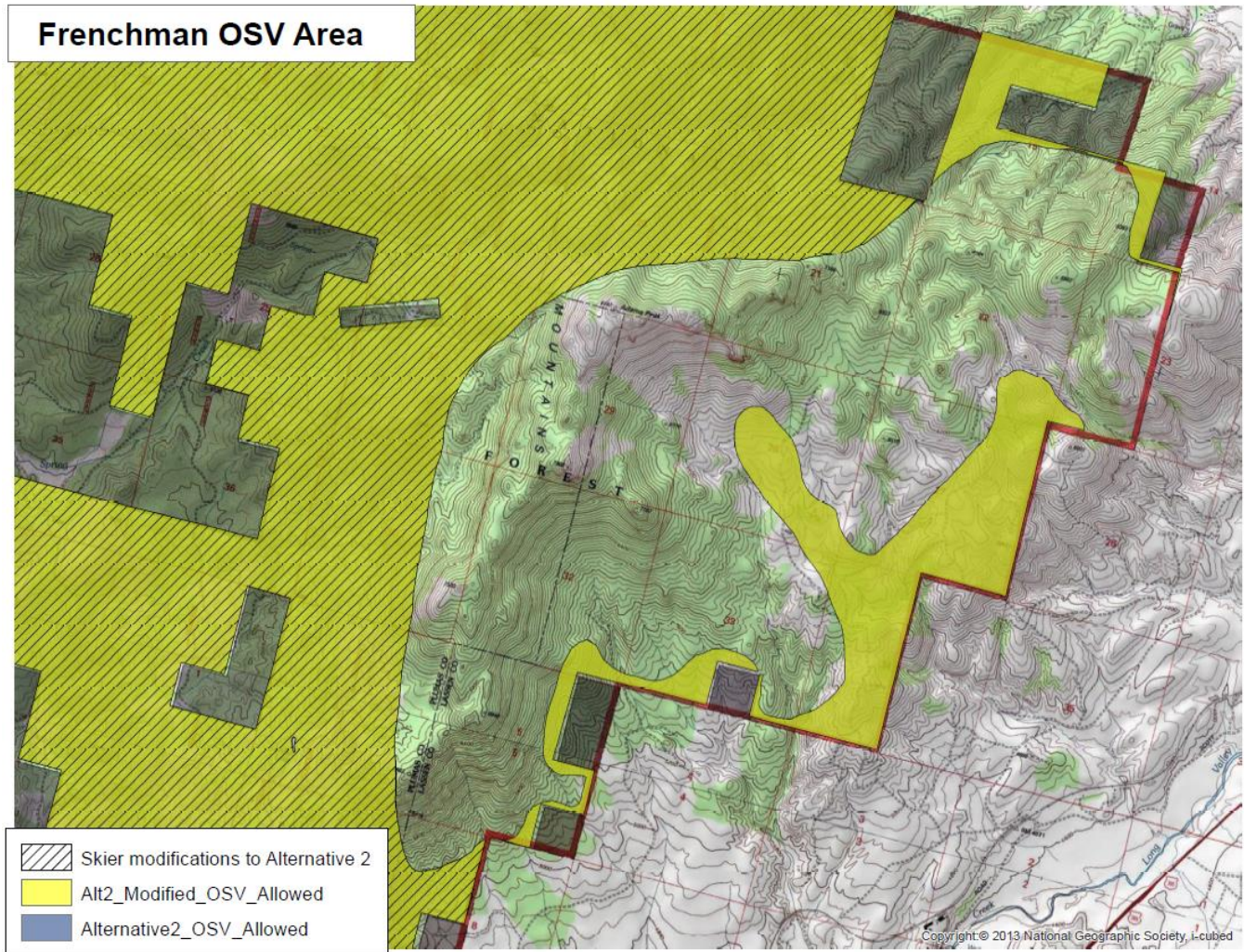
Objection 3C: OSV use designation in portions of the Grizzly Peak Citizen-inventoried Roadless Area

Friends of Plumas Wilderness objects to designating OSV use in portions of the Grizzly Peak Citizen-inventoried Roadless Area.

Remedy 3C: Not designate OSV use in portions of the Grizzly Peak C-IRA that have no OSV use

To reduce conflict between motorized and non-motorized winter users and assuage the conservation communities concerns that designating an area for OSV use will decrease the chances of the area being protected as Wilderness, we suggest that portions of Grizzly Peak Citizen-inventoried Roadless area that do not receive OSV use, not be designated for OSV use.

Friends of Plumas Wilderness provided 7.5-minute USGS maps showing our proposed Grizzly Peak Wilderness boundary to the Plumas National Forest staff. These maps were used in Alternative 5 of the DEIS. We concede that OSV use occurs west of the ridge in the vicinity of Grizzly Peak and prohibiting OSV use here would adversely impact OSV riders. However, the majority of the area not designated for OSV use in Alternative 5 of the DEIS as it is too steep and timbered to be used by OSVs. We strongly recommend not designating OSV use in the Grizzly Peak Citizen-inventoried Roadless Area delineated around the Grizzly Peak IRA, shown in Alternative 5 of the DEIS.



Approximately 1,200 acres of land east and north of the Adams Peak IRA are proposed for OSV use under Alternative 2 Modified. We recommend not designating OSV use in these small, isolated areas.

Objection 3D: OSV use designation in the Adams Peak area does not create high value winter recreation

Friends of Plumas Wilderness objects to proposed OSV use designations in the Adams Peak area, as they reduce the quality of motorized and non-motorized winter recreation opportunities.

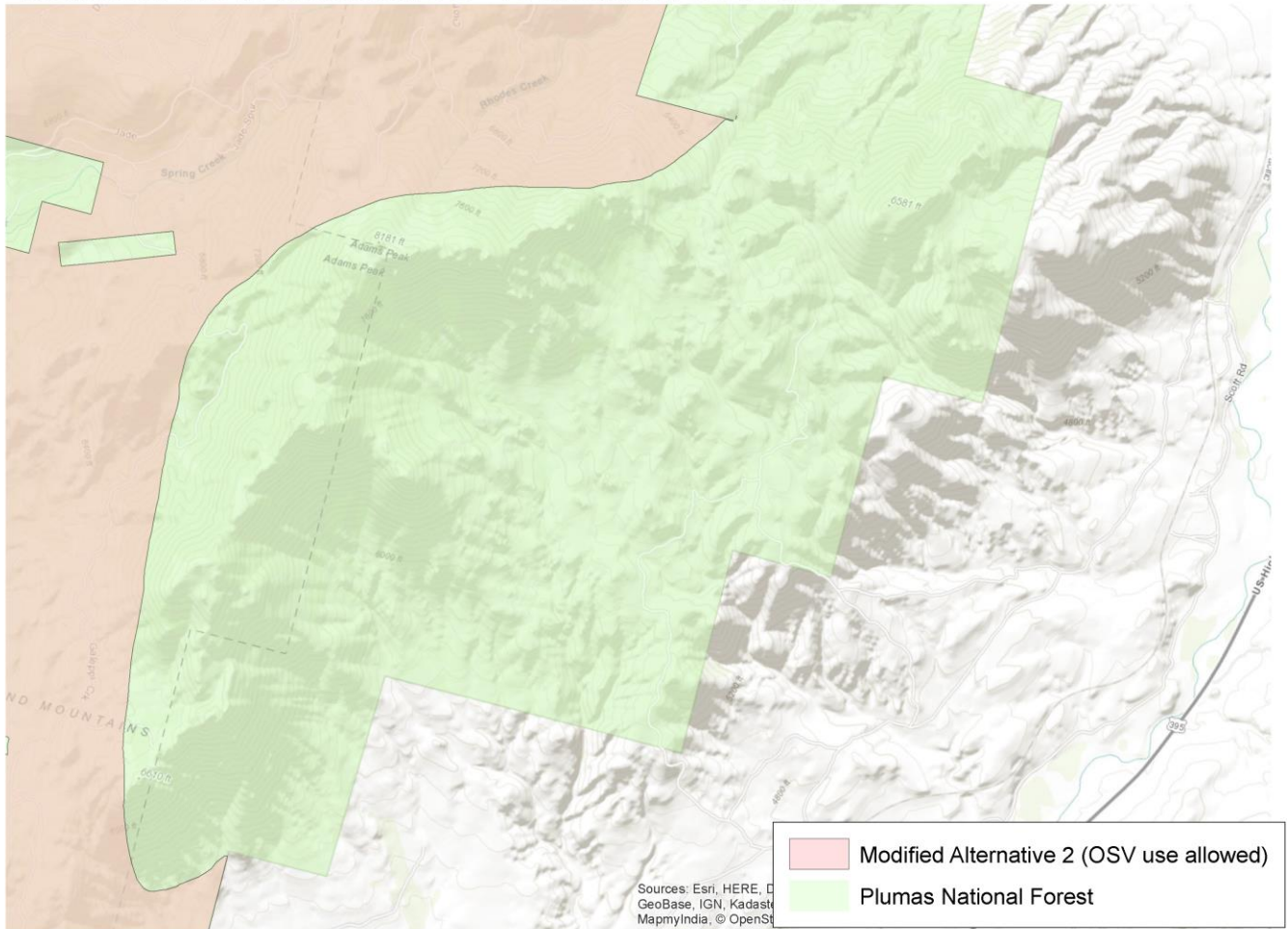
Remedy 3D: Enhance motorized and non-motorized winter recreation by redrawing the no OSV boundary

The map on the following page shows the Friends of Plumas Wilderness proposed OSV use designation in the vicinity of the Adams Peak Inventoried Roadless Area. We propose that OSV use boundary be adjusted to enhance motorized and non-motorized winter recreation opportunities. As delineated in the Draft ROD, the proposed OSV use boundary restricts motorized use for approximately 1.5 miles on 24N44. We suggest moving the western OSV boundary the east side of 24N44. We also suggest moving the eastern OSV boundary farther east to the Plumas National Forest boundary. Because public access on the east side of the Adams Peak IRA is limited by private holdings, using the IRA boundary as the no OSV boundary does not make sense here. The Puma Robles Ranch, located in Long Valley, abuts lands administered by the Plumas National Forest and Bureau of Land Management east of the Adams Peak IRA and precludes motorized access from the east. Feather River Land Trust holds a 5,530-acre conservation easement on the ranch to protect wildlife migration corridors, meadows, and unique habitats. We propose that the Plumas National Forest not designate OSV use on the

isolated lands east of the IRA boundary and west of the Forest Boundary to enhance year-round non-motorized winter recreation opportunities and wildlife values. Doing so will not adversely impact OSV riders as they do not have access to this small area. The total area of the insular lands east of the Adams Peak IRA and parcels to the north is only 1,200 acres.

Friends of Plumas Wilderness recommends not designating OSV use north of 23N62, east of 23N67 and 24N44 to the Plumas National Forest boundary, and south of 24N02X as depicted on 7.5-minute maps provided to the Plumas National Forest. We recommend allowing OSV on 24N44 and on lands west of 24N44 and shown in the map below.

Modifications to Alternative 2 - Frenchman OSV Area



Friends of Plumas Wilderness and allied state and national wilderness groups strongly support the designation of the Adams Peak Wilderness Area. Not designating OSV use in the Citizen-inventoried Roadless Area will enhance wilderness values and not diminish winter motorized recreation opportunities.

4) OSV USE IN AREAS OF HIGH VALUE FOR NON-MOTORIZED WINTER RECREATION

Norwegian miners who came to California during the Gold Rush brought their love of skiing to Plumas County. The hard rock miners built “longboards,” twelve to fifteen foot planks of Douglas fir, also known as “snowshoes”. Because of these Norwegian miners, Plumas County is home to the first organized ski competition in the Americas, held in Onion Valley in 1860, and home of the first ski lift in the Americas, an ore bucket used to haul skiers up Eureka Peak. Ski clubs were located throughout the mountainous mining towns of Plumas and Yuba counties and miners would ski to neighboring towns to compete for large sums of money.

The Plumas Ski Club website states that “the history of skiing in the Plumas County area of the northern Sierra dates back to 1860. Very few people realize that this distinguishes the mountains between Johnsville and LaPorte as the oldest recorded sport skiing [area] in the western hemisphere.” Friends of Plumas Wilderness has helped raise awareness of Plumas County’s deep ski history by producing a film titled: “Home: A Place Worth Preserving” that was featured in the 2016 Winter Wildlands Alliance Backcountry Film Festival and viewed by over 20,000 people. Our organization also recruited Powder Magazine to publish the October 2017 cover article about the 25th Anniversary of the Longboard Revival Series Races.

Friends of Plumas Wilderness advocates for the preservation of high value non-motorized winter recreation opportunities on the Plumas National Forest. We commend the Plumas National Forest for protecting backcountry ski opportunities in Black Gulch and at Bucks Summit. We strongly support the Plumas National Forest improving snowshoe opportunities west of the Gold Lake Highway. We greatly appreciate the Forest Service striving to find a balance between motorized and non-motorized winter recreation and strongly support not designating OSV use along the Historic Lost Sierra Traverse and Pacific Crest Trail from Pilot Peak to the A-Tree. We recognize that the Plumas National Forest sought to protect non-motorized use on the north side of Mt. Elwell, Mt. Washington, and the west side of Eureka Peak to ensure those who ski these three peaks in one day have a unique non-motorized experience known as “The Triple Crown”.

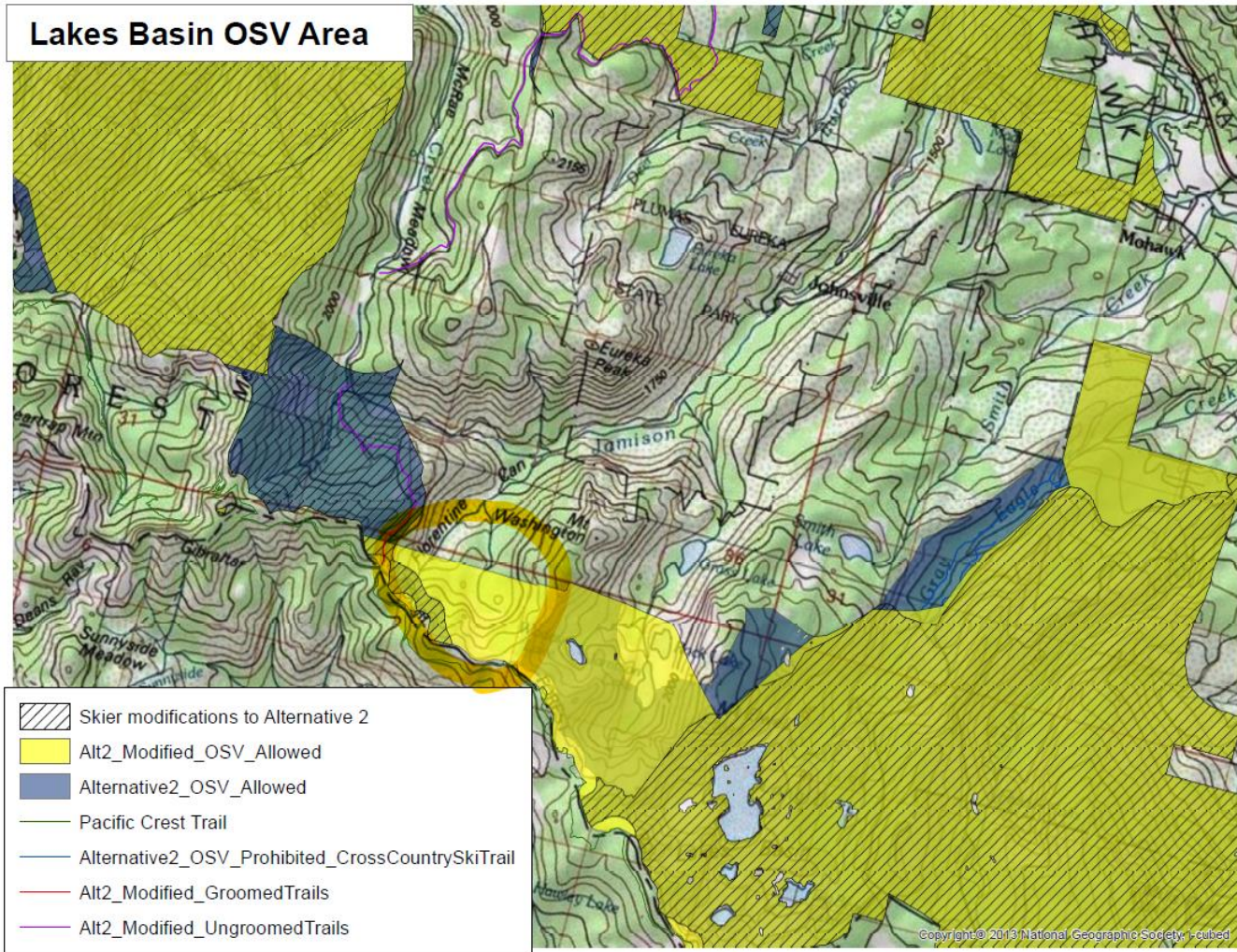
Objection 4: Designating OSV use in upper Florentine Canyon

Friends of Plumas Wilderness objects to designating upper Florentine Canyon for OSV use. Maps dated as early as 1858 show that Florentine Canyon was used as a year-round route of travel between Downieville and Johnsville. Upper Florentine Canyon should be protected as a portion of the Lost Sierra Traverse, as we would like to see the entire historic ski route protected as a non-motorized route for future generations. Although much progress has been made to acknowledge the long history of skiing in Plumas County and protect unique backcountry ski opportunities for future generations, we object to allowing OSV use on a 600-acre area in upper Florentine Canyon.

Remedy 4: OSV use is allowed in the Lakes Basin Semi-Primitive Area; leave Florentine Canyon non-motorized

As discussed earlier in this letter, Plumas National Forest’s development of OSV facilities in Lakes Basin has altered the character of the place and it is no longer “essentially undisturbed” nor has it been managed to “maintain a remote forest setting and allow non-motorized, dispersed recreation.” We encourage the Plumas National Forest to leave a small portion of the Rx-8 area non-motorized, year-round. Friends of Plumas Wilderness recommends not designating OSV use in upper Florentine Canyon to provide a predominantly non-motorized experience along the entire Lost Sierra Traverse.

We acknowledge and support snowmobilers desire to ride between the Lakes Basin and La Porte OSV use areas. To accommodate this, we support designating OSV routes that pass through no OSV areas.



Upper Florentine Canyon is highlighted in yellow. To protect the historic, human-powered Lost Sierra Traverse, we recommend not designating OSV use on an additional 600 acres.

5) THE PACIFIC CREST TRAIL AND OSV USE DESIGNATION

Friend of Plumas Wilderness supported the Plumas National Forest Draft EIS decision to provide a 500 foot setback on either side of the Pacific Crest Trail. We realize that this small setback would not prevent the sounds and smells of OSVs from reaching the PCT, but the small PCT buffer would likely reduce conflicts between motorized and non-motorized winter visitors. Furthermore, a non-motorized corridor along the Pacific crest may benefit TES species such as the Pacific marten, which is known to be present along the PCT in the Lakes Basin area.

We were glad to see that the DROD increased the setback in some places to better protect the non-motorized character of the PCT. We strongly support not designating OSV use south of Bucks Summit and along most of the Lost Sierra Traverse. Friends of Plumas Wilderness believes there are more places where this strategy can be employed to enhance the non-motorized character of the PCT without negatively impacting OSV riders.

Friends of Plumas Wilderness participated in the Over-snow Vehicle / Pacific Crest Trail Objection Resolution meeting held on August 28, 2019 and expressed our support for the way in which the Plumas National Forest worked to balance motorized and non-motorized uses along the Pacific Crest Trail. Because the Plumas National Forest OSV Final EIS is being reviewed by the Regional Forester, we would like to express our desire to provide

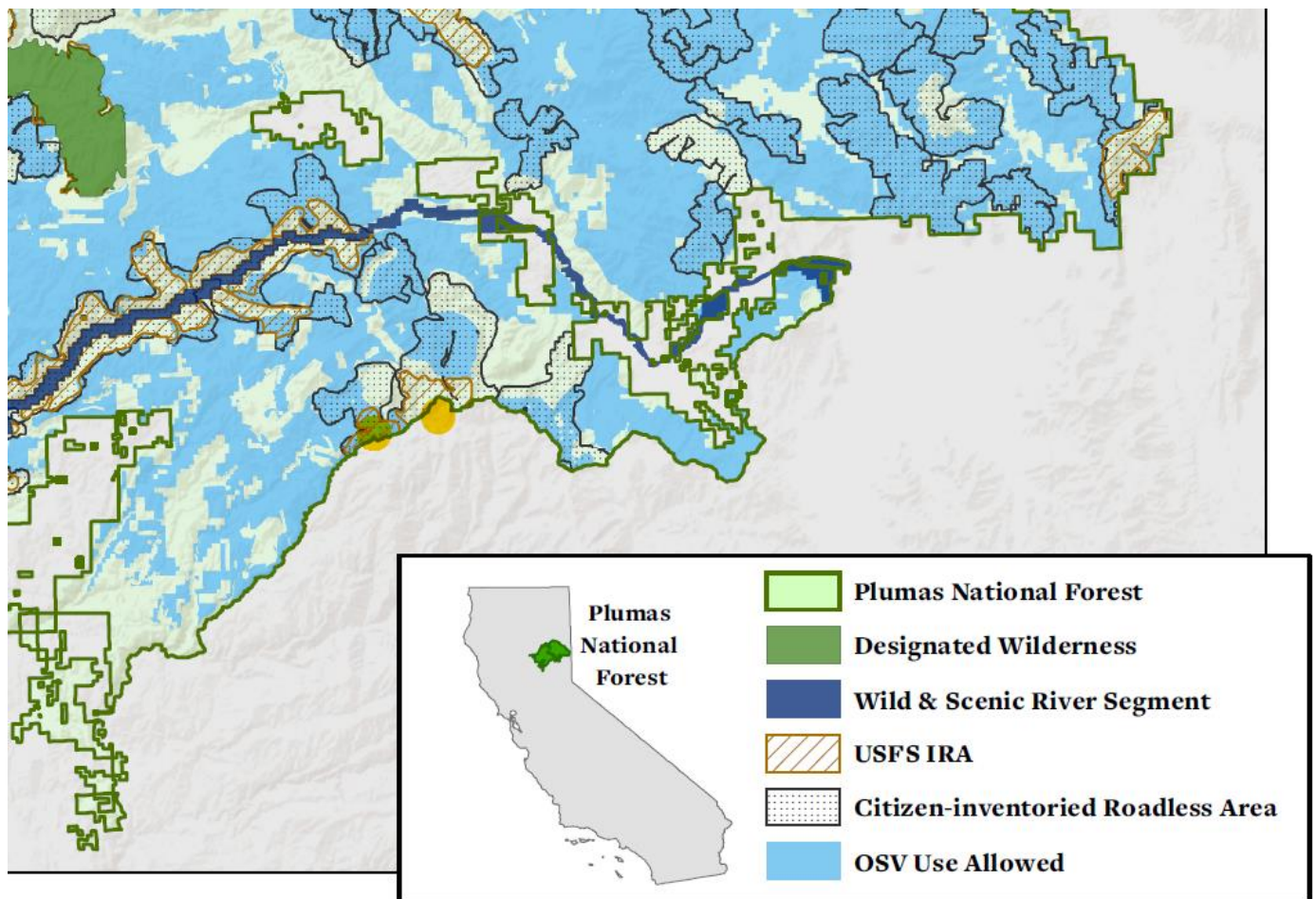
Objection 5B: Designating OSV use in the Beartrap / West Yuba Inventoried Roadless Area

Friends of Plumas Wilderness objects to the Plumas National Forests designating OSV use in the Beartrap / West Yuba IRA. We also appeal to the Regional Forester not to designate OSV use in the 1,605-acre portion of the Beartrap / West Yuba on the Tahoe National Forest.

Remedy 5B: Not designating OSV use in the Beartrap / West Yuba Inventoried Roadless Area

Friends of Plumas Wilderness strongly recommends that the Plumas and Tahoe National Forests not designate OSV use in any portion of the Beartrap / West Yuba IRA as doing so would enhance the non-motorized character of the PCT and Historic Lost Sierra Traverse and not adversely impact OSV use, as no motorized use occurs there now. We advocate for managing the area consistently across Forest boundaries and urge the Regional Forester to not designate OSV use on the portion of the IRA on the Tahoe National Forest.

Earlier in this letter, we discuss the need for the Plumas National Forest to use 2001 IRA data to meet minimization criteria requirements for Travel Management Subpart C. Likewise, we suggest that the Tahoe National Forests not designate OSV use in the Beartrap / West Yuba IRA. Not designating OSV use south of Gibraltar Peak and Beartrap Mountain will protect the non-motorized nature and purpose of the Pacific Crest Trail and Historic Lost Sierra Traverse.



Yellow highlighted areas indicate where the Draft ROD proposes OSV use within the Beartrap / West Yuba IRA on the Plumas and Tahoe National Forests.

Summary

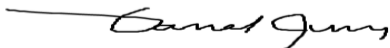
Friends of Plumas Wilderness commends the Plumas National Forest for progress that has been made to address issues that our organization raised related to minimizing impacts to natural and cultural resources and conflicts between OSV use and other recreational uses. We strongly support that the Plumas National Forest does not designate OSV use in the majority of Semi-Primitive areas, Special Interest Areas, and Research Natural Areas. We appreciate that the Forest Service seeks to find a balance between motorized and non-motorized winter recreation by protecting high value recreation areas for motorized and non-motorized winter visitors.

However, we have concerns about some proposed winter travel management decisions and how they will negatively impact Threatened, Endangered, and Sensitive Species and their habitat, designated Wilderness, Citizen-inventoried Roadless Areas, and the Pacific Crest Trail / Lost Sierra Traverse. By incorporating the specific remedies described in this letter and changing OSV use designation on a relatively small number of acres, the Plumas National Forest can achieve our shared goals to provide access, promote safety of all users, minimize impacts to natural and cultural resources, minimize conflicts between OSV use and other recreational uses, minimize conflicts between different vehicle classes, and manage OSV use in accordance with County General Plans.

The Friends of Plumas Wilderness Recommendations Summary Table, provided on the following pages, outlines our suggested changes to winter travel management for the Final EIS and indicates which of our management suggestions were adopted in the Draft ROD. Green text denotes recommendations were implemented and red text indicates recommendations were not implemented.

Thank you for the opportunity to comment on the Plumas National Forest Over-Snow Vehicle Use Designation Final Environmental Impact Statement and Draft Record of Decision. We hope the remedies provided will help guide decision-making regarding winter travel planning and management on the Plumas National Forest. If you have any questions related to these comments or maps we've submitted to Plumas National Forest staff please contact me.

Sincerely,



Darrel Jury, President
Friends of Plumas Wilderness
PO Box 21, Meadow Valley, CA 95956
djury@frc.edu, (530) 616-1461

**Plumas National Forest Winter Travel Management FEIS
Friends of Plumas Wilderness Recommendations Summary Table**

Antelope OSV Use Area

Area	PNF Designation	Our Recommendation - Justification
Elephant's Playground, Papoose Peak, Willow Creek, and Rowland Creek	None – citizen proposed roadless areas	Move the boundary between the proposed Antelope and Frenchman OSV use areas
Keddie Ridge	SPNM, proposed SIA	Support Alternative 5: Extend no OSV area NW to Forest boundary – Maidu Cultural Site
Thompson Peak	SPNM	Support Alternative 2 – High value backcountry skiing
Mud Lake – Wheeler Peak	RNA	Support Alternative 2 – Baker Cypress

Bucks OSV Use Area

Area	PNF Designation	Our Recommendation – Justification
Bucks Lake Wilderness	Wilderness	Support Alternative 2 – No OSVs in Black Gulch east of Wilderness to 24N29X or south of Wilderness to CR 414 between Bucks Summit and Bucks Lake
Mount Pleasant (in BLW)	RNA	Support Alternative 2 – Red Fir Forest and Fens
Bucks Creek – BLW Addition	None	Support Alternative 5: No OSVs west of 24N34, no OSVs north of 24N34 – proposed Wilderness
Bucks Creek Loop Trail	None	Support Alternative 2 – No OSVs between trails
Middle Fork Feather River	WSR, IRA, SPNM, NRTs	Support Alternative 5 – Use FoPW No OSV boundary
Little North Fork Middle Fork	Eligible Wild River	Support Alternative 2 – Wild river
Bear Creek	Eligible Wild River	Support Alternative 2 – Wild river
Fales Basin – BLW Addition	Proposed SIA	No OSV W of 25N80, N of 25N59, or W of 25N17, 25N20 and 25N20K – proposed Wilderness
Feather Falls	Scenic SIA	Support Alternative 2 – Bald Rock Dome
Little Volcano	Geological SIA	Support Alternative 2 – Unique limestone cave
Butterfly Valley	Biological SIA	Support Alternative 2 – Carnivorous plants

Canyon OSV Use Area

Area	PNF Designation	Our Recommendation - Justification
Chips Creek	IRA	Support Alternative 5: No OSVs east of PNF boundary except at Ben Lomond. No OSVs west of 26N26 – proposed Wilderness
Yellow Creek	Eligible Wild River	Support Alternative 2 – Wild River
Squirrel Creek	Eligible Wild River	Support Alternative 2 – Wild River
Red Hill	Proposed Botanical SIA	Support Alternative 2 – Serpentine plants
McNab Cypress	Proposed Botanical SIA	Support Alternative 2 – McNab Cypress

Davis OSV Use Area

Area	PNF Designation	Our Recommendation - Justification
Grizzly Peak	IRA, SPNM	Support Alternative 5: No OSV north of 24N08X or east of 25N29 – proposed Wilderness
Brady's Camp	Proposed Botanical SIA	Support Alternative 2 – Unique plant community
Soda Rock	Geological SIA	Support Alternative 2 – Travertine springs

Frenchman OSV Use Area

Area	PNF Designation	Our Recommendation - Justification
Adams Peak	IRA	No OSVs north of 23N62, east of 23N67 and 24N44 to PNF boundary, south of 24N02X, allow OSV use west of 24N44 – proposed Wilderness
Eastern Escarpment	Proposed Botanical SIA	Support Alternative 2 – Eastside plant communities
Dixie Mountain	Proposed Botanical SIA	Support Alternative 2 – Unique plant community
Little Last Chance Canyon	Scenic SIA	Support Alternative 2 – Scenic canyon

Lakes Basin OSV Use Area

Area	PNF Designation	Our Recommendation
Gold Lake	No OSV	Support Alternative 2 – SNYLF critical habitat
Little Jamison Creek	Eligible WSR	Support Alternative 5: No OSVs in Little Jamison watershed – Wild River
X-Country Ski Trail	None	Support Alternative 5: No OSVs along Ski Trail west of Gold Lake Highway north of Eagle Lake Lodge Rd. – High value snowshoe and ski trails
McRae Meadow	Proposed SIA	Support Alternative 2 – Mountain meadow

LaPorte OSV Use Area

Area	PNF Designation	Our Recommendation
Middle Fork Feather River	WSR, IRA, SPNM, NRTs	Support Alternative 5: Use FoPW No OSV boundary – proposed Wilderness
South Branch Feather River	Eligible Wild River	Support Alternative 2 – Wild river
Onion Valley Creek	Eligible Wild River	Support Alternative 5: Use FoPW No OSV boundary – Wild river, proposed Wilderness
McCarthy Creek	Eligible Wild River	Support Alternative 2 – Wild river, proposed W
Dixon Creek/Buzzards Roost Ridge Roadless Area	Eligible Wild River	Support Alternative 5: No OSVs in Dixon, Union, Dry, Silver, or north of Poorman Creek – Wild rivers
Bald Rock	WSR, IRA, SPNM	Support Alternative 2 – Feather Falls, proposed W
Beartrap	IRA	Support Alternative 5: Extend Roadless Area north to include McRae Ridge – Lost Sierra Traverse

LaPorte OSV Use Area (cont.)

Area	PNF Designation	Our Recommendation
McRae Meadow	Proposed Botanical SIA	Support Alternative 2 – Mountain meadow
Mt. Fillmore	Proposed Botanical SIA	Support Alternative 2 – Unique plant community
Fowler Lake	Proposed SIA	Support Alternative 5: No OSVs north of 22N27 or east of 23N65Y – Unique plant community
Valley Creek	Botanical SIA	Support Alternative 2 – Oldgrowth Sierra Mixed Conifer

Key

- OSV – Over-Snow Vehicle
- PNF – Plumas National Forest
- W – Wilderness
- WSR – Wild & Scenic River
- IRA – Inventoried Roadless Area
- SIA – Special Interest Area
- SPNM – Semi-Primitive Non-Motorized
- CR – County Road
- FoPW – Friends of Plumas Wilderness

Other Recommendations:

- 1) No OSV use below 5,000 feet – these areas do not receive adequate snowfall to minimize OSV impacts to natural and cultural resources.
- 2) Relocate the boundary between the proposed Antelope and Frenchman OSV use areas. Use citizen inventoried roadless areas (Elephant’s Playground, Papoose Peak, Willow Creek, and Rowland Creek) along Last Chance and Squaw Queen Creeks and the divide between Last Chance and Little Last Chance watersheds as the boundary between the Antelope and Frenchman OSV use areas. Shapefiles of The Wilderness Society citizen inventoried roadless area maps have been sent to Plumas National Forest staff.

Green = Recommendation adopted in the Final EIS / Draft ROD

Red = Recommendation not adopted in the Final EIS / Draft ROD