



June 11, 2019

Acting Forest Supervisor Jerry Bird
Plumas National Forest, Supervisor's Office
159 Lawrence Street
Quincy, CA 95971

Re: Granite Basin OHV Trail Development Project Notice of Proposed Action

Dear Supervisor Bird:

Please accept these joint comments of Friends of Plumas Wilderness and the California Wilderness Coalition (CalWild) in response to the Granite Basin OHV Trail Development Project Notice of Proposed Action and Opportunity to Provide Scoping Comments. Since 1974, Friends of Plumas Wilderness has been dedicated to studying, exploring and maintaining the integrity of natural ecosystems where the Sierra and Cascades meet. CalWild has worked to protect and restore the wildest natural landscapes and watersheds on public lands throughout California for 45 years.

We have several concerns related to the proposed development of OHV routes and road reclassifications outlined in the Granite Basin OHV Trail Development Project. Our primary concerns are 1) erosion associated with existing and proposed OHV trails and stream crossings, 2) reduced road maintenance will increase erosion, 3) existing and proposed OHV trails may displace non-motorized trail users, 4) potential impacts on rare plants, and 5) potential impacts on the Middle Fork Feather Wild & Scenic Rivers and its tributary, the Little North Fork Middle Fork Feather River (an eligible wild and scenic river).

Erosion & Water Quality Impacts

The Project Area description fails to mention that the Little North Fork Middle Fork Feather River feeds into the Middle Fork Feather River and flow into Lake Oroville. The reservoir is the primary storage facility for the State Water Project, which supplies drinking water to 26 million Californians. To avoid impacts on drinking water quality for a majority of Californians, we strongly recommend that a primary goal of the Granite Basin OHV Trail Development Project be to reduce erosion associated with existing and proposed trails. To meet this goal, we recommend eliminating OHV crossings of rivers (e.g. where 6M46/7E18 crosses the Little North Fork Middle Fork Feather River north of the Little North Fork Campground), minimizing the number of places where OHVs cross creeks, and decommissioning user-created trails that are excessively steep and are prone to erosion (e.g. the proposed trail east of 23N18 and west of where 6M46/7E18 crosses the Little North Fork Middle Fork Feather River). We are also concerned that the OHV project will increase water quality impacts to the Middle Fork Feather Wild and Scenic River (see wild and scenic section below).



Erosion resulting from OHV use on 6M46 north of the Little North Fork of the Middle Fork Feather River.



Erosion on unnamed user-created OHV trail west of 6M46.

Displacement of Other Trail Users

By allowing motorized use on trails created for non-motorized use, such as route 6M46/7E18 north of the Little North Fork Campground, the Plumas National Forest has improved opportunities for OHV riders but has displaced hikers and equestrians. We urge the Plumas National Forest to maintain opportunities for all types of forest visitors. OHV trespass on hiking trails – as is occurring on the Sky High Trail downstream on the Little North Fork – degrade water quality, violate management guidelines for streams eligible for wild classification, and debase hiker and equestrian experiences. We strongly recommend that the Plumas National Forest enhance hiking and horseback riding opportunities in the Granite Basin Area by designing OHV trails to accommodate equestrians and hikers. Eliminating steep sections of trail adjacent to waterways, as is typical of user-created trails in the Granite Basin Area, will reduce erosion and accommodate use by hikers and horse riders.

Sensitive Plants & Wildlife

The 1988 Plumas Forest Land and Resource Management Plan (LRMP) notes the presence of at least four sensitive plants in the Axford Management Area, which encompasses most of the Little North Fork's upper watershed. The sensitive plants are *Penstemon personatus*, *Vaccinium coccinium*, *Drosera rotundifolia*, and *Cypridpedium fasciculatum*.¹ Because of this, we appreciate and support the commitment made in the scoping document (pg. 6) to conduct botanical resource surveys and to avoid identified resources. The same applies to wildlife surveys as the LRMP also notes the presence of spotted owl and goshawk habitat in the watershed. Amphibian surveys should also be conducted as it appears to us that the upper Little North Fork watershed may encompass critical habitat for the Sierra Nevada Yellow-legged Frog (Subunit 1B).²

Potential Impact To The Middle Fork Feather Wild & Scenic River

Although the project description notes that it is located in the Little North Fork Middle Fork Feather River basin, it fails to note that this is an important tributary watershed to Middle Fork Feather Wild & Scenic River. The Middle Fork Feather was the first river protected in California when the National Wild & Scenic Rivers System was established by Congress in 1968.

In addition to the prohibition against water resource projects that harm the free-flowing character of designated rivers, the National Wild & Scenic Rivers Act requires that rivers in the system be managed to protect their specific outstandingly remarkable scenic, recreation, fish, wildlife, geologic, history, cultural, or other values on federal public lands. Perhaps because the Middle Fork was one of the first rivers designated when the system was established, the Forest Service, as far as we know, has never formally identified the specific outstandingly remarkable values of the river.

The 20-page long Middle Fork Feather River Plan identifies the wild and scenic river corridor and generally describes some of the natural values of the river, but it fails to specifically identify the river's outstandingly remarkable values protected under the law.³ The 1988 Plumas Forest Land and Resource Management Plan also fails to identify the Middle Fork's outstandingly remarkable values.

¹ Plumas National Forest Land and Resource Management Plan pg. 4-157, 1988.

² Designation of Critical Habitat for the Sierra Nevada Yellow-Legged Frog, USFWS, Fed. Reg. Vol. 81, No. 166 Pg. 59097, August 26, 2016.

³ River Plan, Middle Fork of the Feather, Plumas National Forest, undated.

Developed by the National Park Service (NPS), the 1982 Nationwide Rivers Inventory confirmed outstandingly remarkable scenery, recreation, and fishery values for the Middle Fork and identified a potential outstandingly remarkable geology value for the river.⁴ However, we do not know if the Forest Service has formally accepted the NPS's identification of the Middle Fork's outstandingly remarkable values .

The Granite Basin OHV Development Project has the potential to affect some of the Middle Fork's outstandingly remarkable values, even though the project is not located within the Middle Fork river corridor. The project could increase sedimentation and adversely affect water quality in the Little North Fork, which flows into the Middle Fork. Water quality degradation caused by the project could adversely impact the Middle Fork's wild trout fishery and recreation values.

The Middle Fork Feather watershed has a "good" biotic integrity rating (63 out of 100) due to its largely undammed character, the roadless nature of much of its watershed, and the presence of native fish and amphibians.⁵ Indices of biotic integrity are measures of the health of stream and have been developed as an alternative to physical and chemical measures of water quality. The biotic integrity of the Middle Fork could be harmed by a project that increases erosion and sedimentation that results in downstream water quality impairment.

The environmental analysis for the Granite Basin OHV Development Project should confirm the outstandingly remarkable values of the Middle Fork Feather Wild & Scenic River and then fully assess the potential impacts to the river's values that may be caused by the project.

Potential Impact To The Little North Fork Eligible Wild & Scenic River

In response to an appeal settlement agreement, the Forest Service inventoried potential Wild & Scenic Rivers on the Plumas National Forest in 1994, adding it as Appendix S to the 1988 Plumas Forest LRMP.⁶ One of the streams identified as an eligible Wild & Scenic River in the inventory was the Little North Fork Middle Fork Feather River.

Although the inventory lacked a narrative description of the eligible stream segments, the inventory included a map that indicates the entire Little North Fork from its source to its confluence with the Middle Fork is eligible for wild and scenic protection. The map also indicates that the upper segment of the Little North Fork from its source to the Bear Gulch confluence is tentatively classified as Recreational. Downstream of the Bear Gulch confluence to the Middle Fork, the Little North Fork is tentatively classified as Wild.

The specific outstandingly remarkable values that make the Little North Fork eligible were identified as scenery, recreation, and vegetative. No narrative details describing the outstandingly remarkable values were provided. The 1988 Plumas Forest LRMP notes the presence of at least four sensitive plants in the Axford Management Area, which encompass most of the Little North Fork's upper watershed. These sensitive plants may represent the Little North Fork's outstandingly remarkable vegetative value.

⁴ Nationwide Rivers Inventory, National Park Service, January 1982.

⁵ Biotic Integrity of Watersheds, Vol. II, Chapter 34, Sierra Nevada Ecosystem Project Report, UC Davis, July 1996.

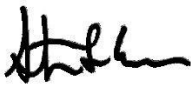
⁶ Plumas National Forest Land and Resource Management Plan Appendix S – Eligible Wild and Scenic Rivers, June 1994.

Forest Service guidelines require the protection of an eligible stream's free flowing character, specific outstandingly remarkable values, and potential Wild, Scenic, and Recreational classifications. The environmental analysis for the Granite Basin OHV Development Project should first confirm the specific outstandingly remarkable values of the Little North Fork and then assess the potential impacts that may be caused by the project to the river's values. In addition, the analysis should also determine whether the project features (motorized trails and roads) comply with the proposed recreational and wild classifications of the Little North Fork's eligible segments.

Members of Friends of Plumas Wilderness have surveyed reaches of the Little North Fork above Coldwater Creek and believe some reaches meet Wild classification criteria. Further, the segment of the Little North Fork downstream of the Coldwater Creek confluence to the Little North Fork campground appears to be eligible for Scenic classification. This segment upstream of the campground is relatively undeveloped but fails to meet Wild classification criteria largely due to motorized use on 6M46/7E18. We strongly recommend that no new OHV trail construction or existing OHV trail reconstruction occur within ¼-mile of the Little North Fork pending verification by the Plumas National Forest of the stream's potential classification and identification of its outstandingly remarkable values. We support watershed restoration projects in the area if they are aimed at minimizing erosion or eliminating user-created OHV trails.

We anticipate that the draft environmental analysis will include the additional information noted above, as well as provide a more accurate Project Area description, an improved Purpose and Need section that includes perspectives and values from a broader spectrum of forest visitors (as well as include more accurate information about current OHV use and proximity to urban areas), and consider a wider array of alternatives.

Sincerely,
/s/ Darrel Jury
Darrel Jury,
President, Friends of Plumas Wilderness
PO Box 21, Meadow Valley, CA 95956
(530) 616-1461



Steven L. Evans
CalWild Rivers Director
4920 Flora Vista Lane, Sacramento, CA 95822
(916) 708-3155
sevans@friendsoftheriver.org