



November 12, 2015

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Re: Over-Snow Vehicle Use Designation Scoping Comments

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.

Plumas Wilderness supports Forest Service efforts to designate Over-Snow Vehicle (OSV) use on the Plumas National Forest. We share the Forest Service OSV planning goals to provide access, minimize impacts to natural (and cultural) resources, avoid conflicts among various uses and provide for the safety of all visitors. However, we feel that the OSV Proposed Action falls short of achieving many of these goals. The Friends of Plumas Wilderness OSV Alternative outlined below and shown on the Plumas National Forest Map provided strives to achieve the OSV planning goals.

Provide Access

The Plumas National Forest currently manages five snowmobile trailheads – Four Trees (el. 5,000'), Bucks Summit (el. 5,500'), Big Creek (el. 4,000'), La Porte (el. 5,000') and Gold Lake (el. 5,600'). The average elevation of these OSV trailheads is 5,020'. The siting of these facilities indicates that adequate snowfall depth for OSV use to occur on the Plumas National Forest is above 5,000'. However, the Proposed Action permits OSV use below 5,000'. Allowing OSV use at low-elevation areas with inadequate snow increases the likelihood of environmental damage and the probability of visitor injury. Authorizing OSV use "on most of each of the three ranger districts" does not support Plumas National Forest OSV planning goals to minimize impacts on natural resources or provide visitor safety. We recommend that the OSV Draft Environmental Impact Statement focus on areas over

5,000' in elevation (approximately 59% of the Plumas National Forest). We suggest prohibiting OSV use below 5000', which will reduce chances of damaging resources and injury to Forest visitors.

Minimize Impacts to Natural (and Cultural) Resources

Friends of Plumas Wilderness supports the Proposed Action to limit OSV use when there is insufficient snow depth, as this will protect natural resources (e.g. vegetation and soils) and cultural resources (e.g. petroglyph sites in the Lakes Basin Recreation Area) from damage due to OSV use. In heavily used OSV areas, we recommend installing permanent fencing or temporary poles and ropes around sensitive resources to protect them from damage due to OSV use.

Snow depth guidelines do not protect natural (or cultural resources) higher than 12" tall (e.g. saplings). Snowmobilers routinely ride over the tops of saplings and break the tops of trees – reducing the aesthetic and commercial value of these trees. We recommend State OSV funds be used to educate snowmobilers on ways to minimize resource impacts. We suggest having Plumas National Forest staff provide “Tread Lightly Tips for Responsible Snowmobiling” at organized snowmobile events.

Although the Proposed Action restricts OSV use within 660' of Bald Eagle (*Haliaeetus leucocephalus*) nests, it does not adequately protect Threatened, Endangered or Sensitive (TES) species. Plumas Wilderness recommends the Plumas National Forest analyze the effects of grooming snow trails and winter recreation on snow-dependent TES species currently and historically found on the Forest. We suggest overlaying maps of current and proposed groomed trails with existing, potential and critical habitat for the following species: Sierra Nevada Yellow-legged Frog (*Rana sierra*), Sierra Nevada red fox (*Vulpes vulpes necator*) and American marten (*Martes americana*). If a literature review of best available science shows that grooming or winter recreation activities have adverse effects on these or other TES species, detrimental activities should be prohibited in existing habitat and reduced in potential habitat to minimize impacts on wildlife.

Sierra Nevada yellow-legged frog – is listed as Threatened under the California Endangered Species Act, Endangered under the US Endangered Species Act and Sensitive by the US Forest Service. Sierra Nevada Yellow-legged Frogs are present on the Plumas National Forest and Critical Habitat was recently designated on the Forest by US Fish & Wildlife. We recommend overlaying maps of proposed OSV use areas and groomed trail networks with Sierra Nevada yellow-legged frog Critical Habitat maps to determine where OSV use and snow grooming might conflict with wildlife concerns. Friends of Plumas Wilderness strongly recommends restricting OSV use in Sierra Nevada Yellow-legged Frog Critical Habitat if best available science shows that OSV use is detrimental to the species.

Sierra Nevada red fox – is listed as a Threatened by California Fish & Wildlife and is a Forest Service Region 5 Sensitive Species. The US Fish & Wildlife Service (USFWS) listed the Sierra Nevada red fox as a candidate species on 10/8/15. The USFWS found the Sierra Nevada population (Sonora Pass) to be a Distinct Population Segment and listed them as warranted for designation as Threatened or Endangered but precluded by higher priority actions. USFWS found the Cascade populations (Lassen Peak and north) not warranted for designation. Friends of Plumas Wilderness suggests that the Forest Service analyze potential habitat for the Sierra Nevada red fox on the Plumas National Forest using guidelines and techniques employed by Lassen Volcanic National Park studies (Perrine et al.) as the USFWS may not have determined critical habitat for the Sierra Nevada red fox prior to the completion of the OSV Draft Environmental Impact Statement.

American marten – We strongly recommend protecting American marten habitat on the Plumas National Forest in areas where they are currently found and where they may disperse. The American marten is a Region 5 Sensitive Species and the Forest Service is required to analyze the potential impacts to this species in the OSV Environmental Impact Statement. We suggest the Forest Service analyze existing and potential American marten habitat on the Plumas National Forest employing guidelines and techniques used by Lassen National Forest studies (Moriarty et al.). The only known population of American marten on the Plumas National Forest are found in the vicinity of the Lakes Basin Recreation Area. Forest Plan direction in the Lakes Basin Semi-Primitive Non-Motorized area states:

“Allow over-the-snow travel, but consider restricting to designated areas if conflicts develop with other users or resources” (Plumas Forest Plan, 1988).

If OSV travel conflicts with American marten, or other TES species, Plumas Wilderness supports closing important habitat areas, such as denning and rearing sites, to visitor use.

In addition to prohibiting OSV use in habitat critical to TES species, Friends of Plumas Wilderness recommends restricting Over-Snow Vehicles in big game winter range or other important wildlife areas. Because we do not have access to all of the data required to identify important wildlife areas, the proposed open areas in the Friends of Plumas Wilderness Alternative should be adjusted if OSV use is determined to have detrimental impacts on any wildlife species or their habitat.

Avoid Conflicts Among Various Uses

There has historically been little conflict between snowmobilers and quiet snow sports enthusiasts on the Plumas National Forest. This may be in part due to the fact that people seeking a quiet snow experience are displaced by OSV use. Motorized and non-motorized winter recreation activities are frequently incompatible, as visitors are seeking experiences at different ends of the Recreation Opportunity Spectrum. Both motorized and non-motorized winter recreation use have increased dramatically in recent years. To avoid conflict between these user groups the Forest Service should designate non-motorized, mixed use, and motorized winter use areas. Doing so would improve the quality of recreation experience, avoid conflict between user groups and improve visitor safety. Unfortunately, the OSV Proposed Action leaves most of the Forest (97%) open to motorized use. Friends of Plumas Wilderness believes there should be places on the Plumas National Forest near every community where people can experience the quiet of winter. We recommend restricting OSV use in the following areas.

Designated Wilderness (23,770 acres) – We strongly support Plumas National Forest efforts to enforce OSV restrictions in the 23,770 acre Bucks Lake Wilderness designated in 1984. The Bucks Lake Wilderness is the only no-OSV area on the Plumas National Forest that regularly receives snow. OSV intrusions routinely occur in the remote western portion of the Wilderness, north of Bucks Lake. Plumas Wilderness strongly recommends that no grooming occur on Forest Road 24N33 north of Bucks Lake as it provides easy OSV access to the western Wilderness boundary.

Wild & Scenic Rivers (11,080 acres) – We support Plumas National Forest efforts to enforce OSV restrictions in the 11,080 acre Wild Zone of the Middle Fork of the Feather River designated in 1968. This area is low-elevation and does not receive adequate snow for OSV use.

Semi-Primitive Non-Motorized Areas in the 1988 Forest Plan Recommended as Non-Motorized (60,800 acres) – Friends of Plumas Wilderness implores that the Plumas National Forest prohibit OSV use from areas designated as Semi-Primitive Non-Motorized, with the exception of Non-Motorized Areas where the Forest Service has promoted OSV use for decades. Friends of Plumas Wilderness recommendations for OSV use designation in Semi-Primitive Non-Motorized Areas are shown in the tables below.

Semi-Primitive Non-Motorized Areas Recommended as OSV Open Areas

Area	Description	Acres*	Acres** Above 5,000'
Beartrap	West of Lakes Basin Recreation Area. Little OSV use.	6,000	6,000
Lakes Basin	Vast majority of the Recreation Area except North of Mt. Washington & Florentine Canyon	12,700	12,700
Total Area		19,000	19,000

*1988 Forest Plan. **Estimated by Friends of Plumas Wilderness.

Recall that Forest Plan direction in the Lakes Basin Semi-Primitive Non-Motorized area states:

“Allow over-the-snow travel, but consider restricting to designated areas if conflicts develop with other users or resources” (Plumas Forest Plan, 1988).

If OSV travel conflicts with non-motorized winter recreation, Plumas Wilderness recommends closing portions of the Lakes Basin Semi-Primitive Non-Motorized Area to OSV use.

Semi-Primitive Non-Motorized Areas Recommended as OSV Restricted Areas

Area	Description	Acres*	Acres** Above 5,000'
Bald Rock	Middle Fork Feather River – Feather Falls Scenic Area. No OSV use.	5,200	0
Chips Creek	Drainage North of North Fork Feather River. No OSV use.	12,700	2,000
Dixon Creek	Nelson Creek tributary. No OSV use.	3,000	1,700
Grizzly Peak	Northeast of Grizzly Ridge. Little OSV use.	7,000	5,000
Keddie Ridge	South of Keddie Ridge. No OSV use.	3,000	3,000
Lakes Basin	North of Mt. Washington & Florentine Canyon	900	900
Middle Fork	Middle Fork Feather River. No OSV use. Does not include 11,080 acre Wild Zone	27,000	7,500
Thompson Peak	South of Susanville. Popular for backcountry skiing. Little OSV use.	2,000	2,000
Total Area		60,800	22,100

*1988 Forest Plan. **Estimated by Friends of Plumas Wilderness

Citizen Proposed Wilderness (approximately 14,120 acres) – In 1986, Friends of Plumas Wilderness developed a Conservationist Alternative that outlined Proposed Wilderness and Backcountry Areas. Many of the areas recommended for protection in the Conservationist Alternative have been designated as Special Interest Areas and received administrative protection in the 1988 Plumas Forest Plan. In anticipation of the upcoming Forest Plan revision, we have developed a new Conservationist Alternative that incorporates the Middle Fork Feather

River Proposed Wilderness (approximately 52,200 acres). This area includes the 11,080 acre Wild Zone, the 27,000 acre Middle Fork Semi-Primitive Non-Motorized Area and an additional 14,120 acres. The Proposed Middle Fork of the Feather River Wilderness meets the criteria for wilderness designation outlined in the 1964 Wilderness Act.

Inventoried Roadless Areas (approximately 5,500 acres) - The 2001 Roadless Rule established prohibitions on road construction, road reconstruction, and timber harvesting on 58.5 million acres of inventoried roadless areas on National Forest System lands. The intent of the 2001 Roadless Rule was to provide lasting protection for inventoried roadless areas within the National Forest System in the context of multiple-use management. There are five Inventoried Roadless Areas on the Plumas National Forest totaling 65,000 acres (5.4% of Plumas National Forest lands). Inventoried Roadless Areas on the Plumas National Forest include: Adams Peak, Beartrap, Chips Creek, Grizzly Peak, and Middle Fork. The only Inventoried Roadless Area on the Plumas National Forest which is not designated as Semi-Primitive Non-Motorized is the 5,500 acre Adams Peak Roadless Area.

Research Natural Areas (380 acres) - Forest Service Research Natural Areas (RNA) protect some of the finest examples of natural ecosystems for scientific study, education and maintenance of biological diversity. There are two Research Natural Areas on the Plumas National Forest, the 1,785 acre Mount Pleasant RNA was designated because of its unique fen wetlands and red fir forests. The entire Mount Pleasant RNA is within the Bucks Lake Wilderness. The Mud Lake RNA consists of two units totaling 380 acres, the 307 acre Mud Lake Unit and the 73 acre Wheeler Peak Unit. These areas were designated because they contain populations of Baker Cypress (*Cupressus bakeri*). Baker cypress are found in only nine locations on the planet, two of which occur on the Plumas National Forest. Baker cypress are recognized by the International Union for Conservation of Nature as Red List Category Vulnerable. Friends of Plumas Wilderness highly recommends restricting OSV use in Research Natural Areas except for research purposes.

Special Interest Areas (approximately 15,560 acres) – The Plumas National Forest has designated four Special Interest Areas. Feather Falls National Scenic Area was established to conserve the lower Middle Fork of the Feather River and its tributaries. Feather Falls, at 410 feet, is the sixth highest waterfall in the nation. Little Last Chance Canyon Scenic Area was established to conserve the scenery below Frenchman Reservoir. Soda Rock Special Interest Area was designated to conserve a travertine outcrop formed by a spring sacred to the Mountain Maidu. The Valley Creek Botanical Special Interest Area was established in 1961. Valley Creek contains one of the few remaining examples of Sierra Nevada mixed conifer old growth forest in the Northern Sierra Nevada Mountains. Valley Creek has also been recognized as habitat for the sensitive foothill yellow-legged frog and the Federally Threatened red-legged frog. Friends of Plumas Wilderness strongly recommends that OSV use is restricted in Special Interest Areas on the Plumas National Forest.

Areas of High Value for Non-motorized Winter Recreation (approximately 6,080 acres) – Plumas Wilderness supports the Forest Service restricting OSV use adjacent to areas which already limit OSV use. Expanding no OSV zones adjacent to known non-motorized areas will make law enforcement easier.

Bucks Lake Area (approximately 2,240 acres)

Plumas Wilderness strongly supports prohibiting OSV use in the 1,920 acre Black Gulch / Clear Creek Area included in the Proposed Action. The area is popular for backcountry skiing and provides a non-motorized buffer on the east side of the Bucks Lake Wilderness. We suggest restricting OSV use on an additional 320 acres north

of the Quincy-Oroville Highway, west of Bucks Summit and east of Bucks Lake, to provide a no OSV buffer on the south side of the Wilderness (see Bucks Lake Area Map). Administrative OSV use would continue to be allowed on Forest Road 24N10Y to provide access to the White Horse Admin Site.

Lakes Basin Area (approximately 3,840 acres)

Friends of Plumas Wilderness supports the concept of restricting OSV use adjacent to Plumas-Eureka State Park to increase human-powered winter sports opportunities. The State Park provides unique winter recreation opportunities by prohibiting OSV use except in the vicinity of the Ski Bowl. Plumas Wilderness recommends the Forest Service adjust the OSV restricted area in the Proposed Action to include a 3,840 acre area west of the State Park that encompasses the unnamed lake on the southern boundary of the State Park; the north and west-facing slopes of Mount Washington below the Mount Washington Trail; the Florentine Canyon watershed north of OHV Route 11M01; and the area east of Forest Road 23N08 and west of Plumas-Eureka State Park (see Lakes Basin Area Map). Within this area, OSV use would be prohibited on Forest Road 22N75Y and OHV Route 11M02. Curtailing OSV use west of Plumas-Eureka State Park will provide unique winter camping opportunities on Forest Service land that are not permitted within the State Park. Plumas Wilderness proposes prohibiting OSV use on Plumas County Road 507 to provide a 4-mile long intermediate cross-country, non-motorized skiing opportunity. This will add an additional two miles to the existing Plumas-Eureka State Park Cross-country Ski Trail on County Road 507.

Provide for the Safety of Visitors

Friends of Plumas Wilderness strongly believes that the recommendations detailed above will provide for the safety of all visitors.

Our main concerns with the OSV Proposed Action are that it:

- Allows for OSV use below elevations that typically receive snow
- Does not protect snow-dependent TES species covered under the 1973 Endangered Species Act or big game winter habitat
- Allows for OSV use in areas designated as Semi-Primitive Non-Motorized in the 1988 Forest Plan
- Allows for OSV use in Citizen Proposed Wilderness, Inventoried Roadless Areas, Research Natural Areas and Special Interest Areas
- Does not provide a spectrum of winter recreation opportunities

The Plumas National Forest OSV Proposed Action allocates 1,155,460 acres where off-trail, cross-country OSV uses would be allowed (97% of Plumas National Forest lands). The Proposed Action does not provide a spectrum of winter recreation opportunities. The Plumas Wilderness OSV Alternative provides a more balanced allocation of motorized winter recreation (approximately 88.5% of Forest lands) and non-motorized winter recreation opportunities (approximately 11.5% of Forest lands). In addition to areas on the Plumas National Forest designated as non-motorized by Congress (the 11,020 acres Wild Middle Feather and the 23,770 acre Bucks Lake Wilderness) we recommend designating approximately 102,440 acres where OSV use is not permitted (approximately 137,230 acres total). The areas we recommend for restricting OSV use are Semi-Primitive Non-Motorized Areas with little OSV use, Citizen Proposed Wilderness with no OSV use, Inventoried Roadless Areas with no OSV use, Research Natural Areas with no OSV use, Special Interest Areas with no OSV use and Areas of High Value for Non-motorized Winter Recreation with little OSV use. The proposed no-OSV areas contain unique biological, geological and scenic features or enhance non-motorized winter recreation

opportunities near places where they are already popular. We believe the Plumas Wilderness OSV Alternative improves opportunities for people to experience the quiet of winter while continuing to allow Over-Snow Vehicle use on the vast majority of the Plumas National Forest.

The human population is rapidly increasing. Technology is allowing people to travel farther faster – in effect reducing the size of the land base. Areas of snow are getting smaller due to a warming climate. Thinking we will continue to pursue winter recreation activities when and where we did in the past is unrealistic. We are pushing up against the limits of nature as once common species are facing extinction. If we wish to conserve our public lands and species dependent upon them, while maintaining quality recreation opportunities, we will need to work together to craft smart solutions to the dilemmas we face. While designating appropriate OSV use areas, we hope the Forest Service will protect natural and cultural resources and listen to the voices of quiet winter sports enthusiasts to provide a spectrum of winter recreation opportunities on the Plumas National Forest.

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