



November 20, 2017

David Hays, Forest Supervisor
Lassen National Forest
2550 Riverside Drive
Susanville, CA 96130

Re: Comments on Lassen OSV Designation RDEIS

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. The issues we are most concerned about include: 1) protecting the area's natural resources such as wildlife and wildlife habitat, sensitive vegetation types and underlying soils by minimizing OSV impacts; 2) maintaining the integrity of Wilderness, Proposed Wilderness, the Pacific Crest Trail and National Recreation Trails by minimizing OSV trespass into these areas and on these trails; and 3) enhancing opportunities for non-motorized winter recreation by minimizing OSV impacts of noise and air pollution in natural ecosystems where people can experience quiet and solitude.

Friends of Plumas Wilderness provided comments to the Lassen OSV Designation Draft Environmental Impact Statement (DEIS) on March 13, 2016 and filed objections to the Lassen OSV Designation Draft Record Of Decision (DROD) on September 27, 2016. Our primary concerns with the DEIS were: 1) it did not abide by the 2015 OSV Planning Rule to manage the forest as closed to OSV use unless marked open; 2) alternatives did not strive to minimize impacts to natural resources, wildlife and uses; and 3) none of the alternatives proposed to close existing OSV trails to protect natural resources, improve wildlife habitat or reduce conflict between motorized and non-motorized winter recreation uses. Our primary concerns with the DROD were: 1) it did not abide by the 2015 OSV Planning Rule to manage the forest as closed to OSV use unless marked as open; 2) it did not minimize conflicts between user groups in the McGowan Lake Area; and 3) it claimed an 86% reduction in snow trails yet did not detail how on-the-ground management would change.

The RDEIS includes Designated OSV Use Areas smaller than Ranger Districts but we believe the boundaries are arbitrary. With the exception of Alternative 5, OSV management emphasis continues to be on delineating areas closed to OSV use rather than managing the forest as closed to OSV use unless marked open. The RDEIS does a better job of addressing “minimization criteria” to reduce impacts to natural resources, wildlife and uses with the addition of Alternative 5, which restricts OSV use in big game winter habitat. The RDEIS considers a wider range of alternatives with the inclusion of Alternative 5, but no alternative proposed to close existing OSV trails to protect natural resources, improve wildlife habitat or reduce conflict between motorized and non-motorized winter recreation uses. No alternative recommends limiting winter recreation in important winter use areas for Threatened, Endangered or Sensitive (TES) Species. The RDEIS did not determine where winter habitat for TES Species and OSV use overlap. It is unfortunate that such simple mapping exercises were not completed as they would provide valuable information on where conflicts between winter recreation and TES Species may exist.

Threatened, Endangered and Sensitive Species

Sierra Nevada red fox (*Vulpes vulpes necator*)

In 1980, Sierra Nevada red fox was listed as a “Threatened” species under the California Endangered Species Act. Sierra Nevada red fox are a Forest Service Region 5 “Sensitive Species.” It is believed that the total population of Sierra Nevada red fox in the Lassen Peak area is fewer than 50 and perhaps as low as 15 individuals. Recent estimates place the number of Sierra Nevada red fox at only 21 individuals, meeting the International Union for the Conservation of Nature’s definition of a “Critically Endangered” species. The Sierra Nevada Red Fox Conservation Assessment (USDA R5-FR-010 2010) states: “The relatively low number and localized distribution of recent Sierra Nevada red fox sightings suggests a small, restricted, and possibly declining population.” The report continues: “Like the wolverine, the Sierra Nevada red fox may be extremely sensitive to human presence” and that “Development and recreation, resulting in increased exposure to humans, vehicles and pets...” is a potential threat to the Sierra Nevada red fox. The report also suggests that “habituation and begging habits may increase the risk of mortality at roads, campgrounds, etc.” Climate change is another threat to Sierra Nevada red fox, as it will result in a loss or restriction of their boreal environment due to reduced snowpack.

Pacific marten (*Martes caurina*)

Pacific marten are a Forest Service Region 5 “Sensitive Species.” Studies in Lassen Volcanic National Park and Lassen National Forest suggest that marten and red fox have a significant overlap of habitat. Like foxes, marten seek deep snow in winter. Studies of marten by Moriarty suggest that marten are more likely to venture into snow covered open areas than open areas without snow. Climate change and decreased snowpack resulting from warmer temperatures likely will negatively affect marten movement and dispersal, and thus their survival. Climate change is expected to reduce winter snowpack in the Lassen National Forest study area by more than 30%. Moriarty’s studies indicate that climate change could result in a 40-80% reduction in Pacific marten habitat throughout California.

Gray Wolf (*Canis lupus*)

With the reestablishment of the gray wolf in California, the California Department of Fish and Wildlife listed the animal as “Endangered” in 2017. The “Lassen Pack” was established on the Lassen National Forest in the fall of 2016 when remote cameras caught a pair of wolves. On June 30, 2017, California Department of Fish and Wildlife caught and collared the adult female and found that she had given birth in the spring. Forest Service cameras later photographed three pups.

The Sierra Nevada Red Fox Conservation Assessment cites studies in Yellowstone that show wolves may benefit red fox populations by reducing coyote numbers. Red fox may also benefit from scavenging

carcasses of prey killed by larger carnivores, especially during winter. Given these studies, the reestablishment of wolves on the Lassen National Forest may benefit the Sierra Nevada red fox.

North American Wolverine (*Gulo gulo luscus*)

The North American Wolverine was listed as a “Threatened” species in California in 1971. In 2008, a male wolverine was photographed on the Tahoe National Forest. California Fish and Wildlife biologists caught video footage of what they believe to be the same individual in 2016. If this is the same animal, it is a male from the Sawtooth Range in Idaho who is estimated to be nine years old. The range of this wolverine is estimated to be 297 square miles. Wolverines historically inhabited the Lassen National Forest. Wolverine have been documented in what is now the Green Island Lake Research Natural Area at the headwaters of Soda Creek.

Given the presence or potential reestablishment of these species on the Lassen National Forest, and the limited analyses of impacts to these species in the RDEIS, **we urge the Lassen National Forest develop a Winter Recreation Management Plan that identifies areas where conflict may exist between winter recreation uses and TES Species.** Furthermore, **we recommend that a Winter Recreation Management Plan outline a strategy to educate the public about these TES Species, how to respect wildlife and reduce impacts to them and how to identify and encourage citizen scientists to report sightings.** Understanding that no further analyses will be completed for the Lassen OSV Designation process, **we urge the Forest Service to include explicit language in the Lassen OSV FEIS stating if peer-reviewed research shows winter recreation use negatively impacts any TES Species or their habitat that winter use be restricted from areas critical to their survival.**

Climate Change and Winter Recreation

A recent study by Dr. Ben Hatchett of the Desert Research Institute showed that winter snow levels in the Northern Sierra have risen by 1,500’ in the last 10 years. Additional climate change research in the Northern Sierra has shown increased air temperatures, reduced precipitation falling as snow, shortened winter seasons and reduced snowpack. Studies of wildlife dependent upon snow predict their available habitat will be reduced, thus diminishing their likelihood of survival. These studies suggest that winter recreation management will become increasingly difficult as wildlife habitats and winter recreation use becomes more concentrated. In order to plan for the future, **we recommend that the Lassen National Forest develop a Winter Recreation Management Plan that anticipates conflicts between winter uses by describing realistic Desired Future Conditions and establishes Goal, Objectives, and Actions to reach those conditions.** We suggest that an advisory committee, with representation from motorized and non-motorized winter recreation groups and support from climate scientists and wildlife biologists, provide input for the Lassen Winter Recreation Management Plan.

Current Situation, Desired Future Conditions, and Recommendations for OSV Areas

In an effort to demonstrate what a Winter Recreation Management Plan might look like, we provide our assessment of the Current Situation, Desired Future Conditions, and Recommendations to attain desired results for proposed OSV Areas. Our primary goals are to protect unique habitats and TES Species while providing outstanding opportunities for motorized and non-motorized winter recreation. Our recommendations strive to reduce conflict between uses by combining elements from Alternatives 4 and 5.

Ashpan

Current Situation

The Ashpan OSV Area provides 57.4 miles of groomed OSV trails and 8.9 miles of ungroomed trails on the Lassen National Forest and Latour State Forest. Over-snow vehicle access to the Morgan Summit and Swain Mountain OSV Areas is via ungroomed trails. Over-Snow Vehicle use is restricted in the Snow Mountain area. The Eskimo Hill snow play area is located on Highway 44/89 across from the entrance to Lassen Volcanic National Park. No Cross-Country Ski Adventures are shown on the Lassen Winter Recreation Guide in this area.

The Thousand Lakes Wilderness is located in the center of the Ashpan OSV Area and is prone to OSV trespass along the southern boundary. Forest Route 16 is groomed in winter, linking OSV trails on the Lassen National Forest with OSV trails in Latour State Forest. The Designated Groomed OSV Trail comes within ¼-mile of the southwest corner of the Wilderness (T32N, R3E, sec. 3).

A core marten population exists in the Thousand Lakes wilderness. Spencer and Rustigian-Romsos (2012) modeled potential habitat and movement corridors in the Cascade and Sierra Nevada regions and recommend protecting key habitat around core marten populations in the Mount Lassen-Swain Mountain-Thousand Lakes Wilderness region. In addition, movement corridors between these areas and the west slopes of the Plumas and Lassen National Forests are prioritized for marten conservation.

Desired Future Condition

- To maintain the Thousand Lakes Pacific marten population. Provide a wildlife corridor to link the Thousand Lakes Wilderness marten population with the Lassen Park population.
- To eliminate OSV trespass in the Thousand Lakes Wilderness. Apply for CA OHV funds to educate OSV visitors and monitor the south Wilderness boundary with remote sensors.
- To maintain high quality motorized winter recreation opportunities.
- To enhance non-motorized winter recreation opportunities. Expand the Thousand Lakes Wilderness. With the Forest Plan revision designate Cypress and Devil's Garden IRAs as SPNM Areas Recommended as Wilderness.

Recommendations

Friends of Plumas Wilderness supports Alternative 4 with the following change: **restrict OSV use in Cypress and Devil's Garden Inventoried Roadless Areas (IRAs) north and southeast of the Thousand Lakes Wilderness.** Friends of Plumas Wilderness supports expanding the Thousand Lakes Wilderness to include the Cypress and Devil's Garden IRAs and will advocate for changing management of these areas to Recommended Wilderness when the Forest Plan is revised. Restricting OSV use in the IRAs will facilitate changing Management Area classification and will reduce the likelihood of OSV trespass in the Thousand Lakes Wilderness. **We also recommend that the Lassen National Forest apply for California OHV funds to educate OSV users about Wilderness and purchase remote OSV sensors to monitor for OSV trespass along the southwest boundary of the Thousand Lakes Wilderness.**

We recommend that the Lassen National Forest educate winter recreation visitors about TES Species, how to ID them and report sightings, and how to respect wildlife and minimize impacts to TES Species. We urge that the Forest Service reduce winter recreation intensity or restrict winter recreation in areas critical to the survival of red fox and other TES Species if peer-reviewed science shows suggests doing so will benefit the species.

Bogard

Current Situation

The Bogard OSV Area provides 26.6 miles of groomed OSV trails accessed from Highway 44. The OSV trails are concentrated in the eastern portion of the unit and provide access to the Crater Lake Special Interest Area and Antelope Mountain Lookout. An ungroomed OSV trail provides access to Eagle Lake from the intersection of Highway 44 and Lassen County Road 105, approximately 25 miles northeast of Susanville. The ungroomed meadows of the Pine Creek Valley east of Highway 44 are open for snowmobiling. Groomed and ungroomed OSV trails in the Swain Mountain OSV Area west of Highway 44 are easily accessible from numerous locations in the Bogard OSV Area.

The Eagle Lake Tour is an easy 10-mile round trip ski adventure on the south shore of Eagle Lake. More advanced skiers can climb up Antelope Mountain from the east side of Eagle Lake for a 10-mile adventure.

The western portion of the Bogard OSV Area has two Semi-Primitive Non-Motorized areas. The Murken Bench Botanical Special Interest Area is located just east of the SPNM areas. The Pacific Crest Trail follows the Hat Creek Rim, just east of the SPNM Areas. The Blacks Mountain Experimental Forest is located in the center of the Bogard OSV Area. The Experimental Forest encompasses five Research Natural Area units comprising 521 acres of ancient Ponderosa Pine forests.

Sierra Nevada Red Fox (*Vulpes vulpes necator*) have been detected along Highway 44 in the vicinity of the Bogard Staging Area and south of Crater Mountain.

Desired Future Condition

- To increase the number of Sierra Nevada red fox. Link the Lassen population with populations to the north via wildlife corridors.
- To protect unique plant species found in the Murken Bench Botanical Special Interest Area. Prohibit OSV use in the SIA.
- To reduce soil compaction in ancient Ponderosa Pine stands in the Blacks Mountain RNA units. Prohibit OSV use in the RNA units.
- To maintain water quality of Crater Lake. Prohibit off road OSV use in the SIA.
- To maintain water quality of Eagle Lake. Prohibit OSV use along the shores of Eagle Lake.
- To maintain high quality motorized winter recreation opportunities.
- To maintain high quality non-motorized winter recreation opportunities. Maintain SPNM Areas.

Recommendations

Friends of Plumas Wilderness supports Alternative 5 as it prohibits OSV use in SPNM Management Areas, the Murken Bench Botanical Area, the Blacks Mountain Research Natural Area units, and the Brockman Flat Lava Beds. **In addition, we recommend that OSVs be restricted to roads within the Crater Lake SIA.**

We recommend that the Lassen National Forest educate winter recreation visitors about TES Species, how to ID them and report sightings, and how to respect wildlife and minimize impacts to TES Species. We urge that the Forest Service limit winter recreation in areas critical to the survival of red fox and other TES Species if peer-reviewed science shows suggests doing so will benefit the species.

Fall River

Current Situation

The proposed Fall River OSV Area is not included on the Lassen National Forest Winter Recreation Guide (2005). Due to the area's low elevation it provides little opportunity for motorized winter recreation. No designated OSV trails and no groomed trails are included in Alternatives 3 and 4 (Alternative 5 does not include the Fall River OSV Area).

The area provides big game winter habitat with the Pit River bisecting the unit. The Pacific Crest Trail traverses the area from the southeast to the northwest and provides excellent opportunities for non-motorized winter recreation.

Desired Future Condition

- To maintain big game winter habitat.
- To maintain non-motorized winter recreation opportunities.

Recommendation

Because this area offers no designated OSV trails for motorized winter recreation, **Friends of Plumas Wilderness supports Alternative 5, which eliminates the proposed Fall River OSV Area.** Emphasis should be placed on wildlife and non-motorized winter recreation as the area has excellent non-motorized recreation opportunities and significant big game winter habitat.

Fredonyer

Current Situation

The Fredonyer OSV Area provides 43.7 miles of groomed OSV trails accessed from Highway 36 approximately 12 miles southwest of Susanville. The groomed network of OSV trails is located in the center of the Fredonyer OSV Area. Over-Snow Vehicle trails in the Fredonyer OSV Area access lands managed by the Plumas National Forest to the south. Trails north of Highway 44 in the Swain Mountain OSV Area are easily accessed from the Fredonyer staging area.

Hamilton Mountain (7,387') and the unnamed peak northwest of it (7,138') provide skiing opportunities for intermediate backcountry skiers close to the Fredonyer staging area. The Diamond Mountains are located in the eastern portion of the OSV Area and provide excellent OSV and backcountry skiing opportunities on north-facing slopes close to Susanville. Backcountry skiers access the area in early winter and spring when they can drive up 29N43 to access Cabin and Basque Bowls, immediately east of an unnamed peak locally known by skiers as The Nipple (7,399' on the Diamond Mountain 1:63,360 map in the Lassen National Forest Atlas).

The Homer / Deer Special Interest Area is located on the north side of Keddie Ridge, in the eastern portion of the Fredonyer OSV Area. Keddie Peak and the lakes in the SIA are of cultural significance to the Mountain Maidu, being the center of the universe in their creation myth.

Desired Future Condition

- To maintain cultural values of the Homer / Deer Special Interest Area.
- To maintain high quality motorized winter recreation opportunities.
- To improve non-motorized winter recreation opportunities. Designate a non-motorized winter recreation areas in the vicinity of Hamilton Mountain and east of Diamond Mountain.

Recommendations

Friends of Plumas Wilderness supports Alternative 4 with the following exceptions:

1. Restrict OSV use in an area around Hamilton Mountain bounded by 29N46, 29N85 and 29N85F;
2. Prohibit OSV use east of The Nipple (T28N, R12E sec. 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16).

Jonesville

Current Situation

The Jonesville OSV Area provides 68.2 miles of groomed OSV trails. Over-Snow Vehicle trails are accessed from Jonesville and the west shore of Lake Almanor. Colby Mountain Lookout is a popular snowmobile destination.

The Colby Meadows Cross Country Ski Area provides 10 miles of ski trails for beginner and intermediate skiers. Adventure Outings of Chico State University maintains a yurt in Colby Meadows that can be rented by the public. Cross-country ski trails in Colby Meadows are closed to motorized use and most snowmobilers respect the closure. Only three known incidents of snowmobile trespass have occurred in the last twenty years. During a recent low-snow year, a snowmobile did access Colby Meadow and caused significant resource damage. Off-Highway Vehicle trespass and resource damage occur in Colby Meadows more frequently. To reduce conflict between motorized and non-motorized users, Friends of Plumas Wilderness has been working with the Butte Meadows Snowsliders, Chico XC Ski Club, Recreation Outdoors Coalition, and Sierra Club Yahi Group to delineate boundaries for the Colby Meadows Cross Country Ski Area.

The Lake Almanor Recreation Trail provides an easy to moderate 19-mile round trip ski along the west shore of Lake Almanor. The trail is closed to all motorized vehicles. Opportunities for remote backcountry skiing exist at Butt Mountain. This Semi-Primitive Non-Motorized Area is located south of Deer Creek and can be accessed via the Pacific Crest Trail.

The Pacific Crest Trail bisects the Jonesville OSV Area. Several Research Natural Areas are located within the Jonesville OSV Area. The 3,922 acre Cub Creek RNA was established to study mixed conifer forest in a tributary to Deer Creek. The 1,300 acre Soda Ridge recommended RNA targets white fir forests along Soda Creek. The 1,185 acre Green Island Lake recommended RNA protects a moss bog at the headwaters of Soda Creek. Wolverine have been documented in the Soda Creek watershed. Several Semi-Primitive Non-Motorized areas are also located within the unit, these include: Soda Creek, Chips Creek, Chambers Creek, Grass Lake, Table Mountain, and Butt Mountain.

A core marten population occurs in the Jonesville/ Humboldt Peak area. Spencer and Rustigian-Romsos (2012) modeled potential habitat and movement corridors in the Cascade and Sierra Nevada regions and recommend protecting key habitat around core marten populations in the Mount Lassen-Swain Mountain-Thousand Lakes Wilderness region. In addition, movement corridors between these areas and the west slopes of the Plumas and Lassen National Forests are also prioritized for marten conservation.

Desired Future Condition

- To maintain Pacific marten population size in the area. Link with populations to the north via wildlife corridors. Limit winter recreation activities if peer review science shows conflict between uses.
- To maintain high quality motorized winter recreation opportunities. Provide a Designated Ungroomed OSV Trail on public lands in the area west of Lake Almanor to allow access from

private homes to the Groomed OSV Trail not under Forest Service Jurisdiction west of Highway 89 (Humboldt Road, Plumas County Road 308).

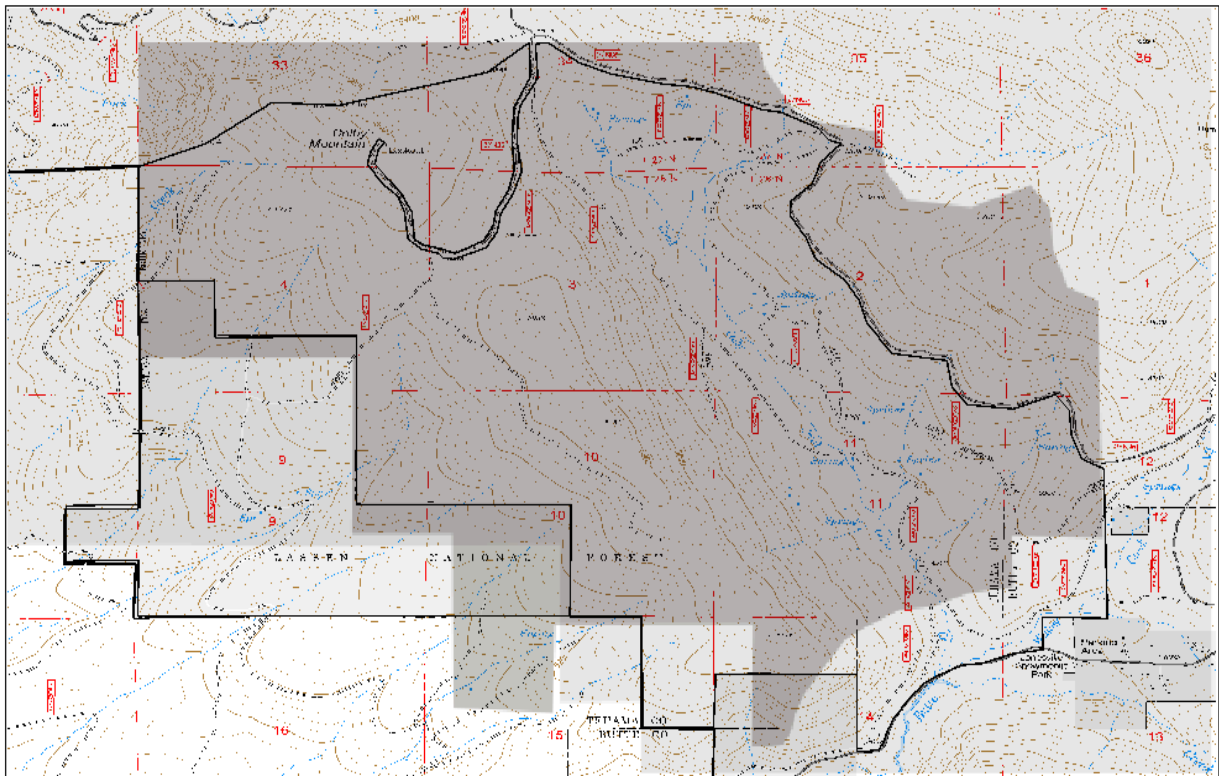
- To enhance non-motorized winter recreation opportunities. Define non-motorized boundaries for the Colby Meadows Cross Country Ski Area (see map below). Expand Butt Mountain SPNM Area boundaries to the north and east (extend to the Lassen National Forest boundaries to match the IRA).
- To protect the Chips Creek and Soda Creek drainages as Wilderness. Expand Soda Creek SPNM Area boundaries to the east (extend to the Plumas National Forest boundary to match the IRA).

Recommendations

Friends of Plumas Wilderness supports Alternative 4 with the following exceptions: 1) use boundaries shown on the Proposed Colby Meadows Cross Country Ski Area Non-motorized Area map below, 2) extend the non-motorized area north and east of the Butt Mountain SPNM Area to the Lassen National Forest Boundary (use Inventoried Roadless Area boundaries), and 3) extend the non-motorized area downstream of the Soda Creek SPNM to the Plumas National Forest boundary (use Inventoried Roadless Area boundaries).

Lassen Winter Use Stakeholders collaborated to delineate boundaries for the proposed Colby Meadows Cross Country Ski Area Non-motorized Area (below).

Proposed Colby Meadows Crosscountry Ski Area Non-motorized Area Boundary 11/13/17



The proposed Colby Meadows Cross Country Ski Area boundary formalizes established use areas and should minimize conflict between motorized and non-motorized winter visitors.

We recommend that the Lassen National Forest educate winter recreation visitors about TES Species, how to ID them and report sightings, and how to respect wildlife and minimize impacts to TES Species.

We urge that the Forest Service reduce winter recreation intensity or restrict winter recreation in areas critical to the survival of red fox and other TES Species if peer-reviewed science shows suggests doing so will benefit the species.

Morgan Summit

Current Situation

The Morgan Summit OSV Area provides 62.1 miles of groomed OSV trails. Access is via Morgan Summit, Mill Creek and Mineral. Most motorized winter use occurs south of Highway 36 but snowmobilers wish to maintain access from Mineral to the Designated Ungroomed OSV Trail on Primary Forest Route 17 north of Highway 36. Snowmobilers envision a “Dream Trail” that would circumnavigate Lassen Volcanic National Park and link the Morgan Summit, Ashpan, and Swain Mountain OSV Areas.

The McGowan Cross Country Ski Trail provides 10 miles of exceptional beginner and intermediate ski and snowshoe opportunities. The National Recreation Trail is accessible from a trailhead on Highway 89 south of Lassen Volcanic National Park and two trailheads on Highway 36 west of Morgan Summit. The 2.1 mile Church Camp Trail is often groomed. Human-powered winter recreationists envision a trail accessing the McGowan Cross Country Ski Trail system from Mineral.

The location of the McGowan National Recreation Trail is disputed. The Dry Lake Trail (30N16) is shown as closed to all motor vehicles during winter on the Lassen National Forest Winter Recreation Guide (2005). The National Recreation Trails Database (americantrails.org) shows the length of trail as 10 miles on Forest Roads 29N22 and 30N16 with elevations ranging from 5,020 to 6,200. Snowmobilers believe that the Dry Lake Trail west of the intersection of the Nanny Creek Trail and Dry Lake Trail is legally open to OSVs. Skiers believe the entire Dry Lake Trail (30N16) is closed to motorized use (as the Lassen Winter Recreation Guide shows). Skiers complain of motorized trespass multiple times per year and of early season OHV trespass.

The Morgan Summit OSV Area encompasses the Ishi Wilderness; Mill Creek, Heart Lake, and Spencer Meadows recommended Wilderness areas; the 3,900 acre recommended Indian Creek RNA, the Iron Mountain candidate RNA (in the Ishi Wilderness); Deer Creek and North Fork Antelope Creek SPNM areas; and three National Recreation Trails - McGowan Cross Country Ski Trail, Heart Lake Trail and Spencer Meadows Trail. The Morgan Summit OSV Area also contains the Deep Hole Geologic SIA.

Sierra Nevada Red Fox have been detected in the Morgan Summit OSV Area northwest of Chester and along highway 89 southwest of Lassen Volcanic National Park. American marten have been detected in the Morgan Summit OSV Area.

Desired Future Condition

- To increase number of Sierra Nevada Red Fox. Link the Lassen population with populations to the north via wildlife corridors. Limit winter recreation if peer-reviewed science shows conflict.
- To maintain Pacific marten population size in the area. Link with populations to the north via wildlife corridors. Limit winter recreation activities if peer-reviewed science shows conflict.
- To enhance high quality motorized winter recreation opportunities. Allow OSV access from Mineral to Primary Forest Road 17. If permitted by the Secretary of Agriculture, allow OSV use on 30N16 west of Martin Creek.
- To enhance non-motorized winter recreation activities. Develop non-motorized trails from Mineral to the Dry Lake Trail (30N16) via 29N36 and 29N11Y. Encourage human-powered winter use on the Heart Lake National Recreation Trail east of Martin Creek.

- To prohibit OSV use within the Deep Hole SIA
- To designate the Indian Creek rRNA as a RNA.
- To designate the Iron Mountain cRNA as a RNA.
- To designate the Mill Creek Recommended Wilderness as Wilderness.
- To designate the Heart Lake Recommended Wilderness as Wilderness. Include the IRA west of Loomis Peak and north of Blue Lake Canyon (Bailey Creek).
- To designate the Spencer Meadows Recommended Wilderness as Wilderness. Extend the Recommended Wilderness boundary south on Wild Cattle Mountain to the Spencer Meadow Trailhead (use the IRA boundary).

Recommendations

Friends of Plumas Wilderness recommends using the OSV use boundaries shown for Alternative 5 with the following exceptions:

1. Allow OSV use on the Dry Lake Trail (30N16) west of Martin Creek,
2. Prohibit OSV use on the Dry Lake Trail (30N16) east of Martin Creek,
3. Extend the non-motorized area below the Dry Lake Trail (30N16) west to Martin Creek and develop a non-motorized trails from Mineral to the Dry Lake Trail (30N16) via 29N36 and 29N11Y,
4. Prohibit OSV use in the Deep Hole Geologic Special Interest Area, and 5) eliminate the two small Designated OSV Use Areas near Round Mountain (T27N, R2E, sec. 4) and Black Butte (T28N, R2E, sec. 29).

We recommend that the Lassen National Forest educate winter recreation visitors about TES Species, how to ID them and report sightings, and how to respect wildlife and minimize impacts to TES Species. We urge that the Forest Service reduce winter recreation intensity or restrict winter recreation in areas critical to the survival of red fox and other TES Species if peer-reviewed science shows suggests doing so will benefit the species.

Shasta

Current Situation

The proposed Shasta OSV Area is not included in the Lassen National Forest Winter Recreation Guide (2005). Due to the area's low elevation it provides little opportunity for motorized winter recreation. No designated OSV trails and no groomed OSV trails are included in Alternatives 3 and 4 (Alternative 5 does not include the Shasta OSV Area).

The area has outstanding opportunities for non-motorized winter recreation and contains globally and regionally unique plant species. The Timbered Crater recommended Research Natural Area (rRNA) contains a portion of the largest population of Baker cypress (*Cupressus bakeri*) in the world. Baker cypress is listed as a Vulnerable, Threatened species by the International Union for the Conservation of Nature. This population of Baker cypress is one of only eleven locations on the planet where the species is found. The 1777-acre Timbered Crater rRNA protects a portion of the 7000-acre stand of Baker cypress. We recommend that OSV use be restricted in the entire Baker cypress stand. The Mayfield candidate Research Natural Area (cRNA) protects 1000 acres of knobcone pine (*Pinus attenuata*) in the northwestern portion of the proposed Shasta OSV Area. We support the Lassen National Forest decision to restrict OSV use in the Mayfield cRNA. Two areas between the Timbered Crater and Mayfield RNAs are designated Semi-Primitive Non-Motorized (SPNM) in the Lassen Land & Resource Management Plan (1992). We strongly believe OSV use should be restricted in these SPNM areas.

Desired Future Conditions

- To have the Timbered Crater population of Baker's cypress remain the largest population of the species on the planet. Have the species down-listed from Vulnerable to Near Threatened. Designate the rRNA as a RNA.
- To maintain the extent of the Mayfield population of knobcone pine. Designate the cRNA as a RNA.
- To maintain unique species found in the Murken Bench SIA. Restrict OSV use in the SIA.
- To maintain non-motorized winter recreation opportunities. Retain these SPNM Areas in the revised Lassen Land & Resource Management Plan.

Recommendation

Because this area offers no designated OSV trails for motorized winter recreation, **Friends of Plumas Wilderness supports Alternative 5, which eliminates the proposed Shasta OSV Area.** Management emphasis should be placed on maintaining globally and regionally unique species in RNAs and SIAs, and enhancing non-motorized winter recreation opportunities in SPNM areas.

Swain Mountain

Current Situation

The Swain Mountain OSV Area provides 91.8 miles of groomed OSV trails. The area can be accessed from Lassen County Road A-21 and from the Chester-Lake Almanor Staging Area on Highway 36. The area is considered the hub of the OSV trail network on the Lassen National Forest. The area provides direct access to the Bogard and Fredonyer OSV Areas, offering 200 miles of marked trails. Many groomed trails are in close proximity to Lassen Volcanic National Park and the Caribou Wilderness, where OSV use is restricted. Opportunities for wheeled vehicle winter recreation are provided at the Potato Buttes Challenge in the western portion of the Swain Mountain OSV Area. The 17-mile 4-wheel drive route is southeast of Highway 44 between Old Station and the Ashpan Staging Area.

The Swain Mountain OSV Area surrounds the Caribou Wilderness, several small SPNM Areas on the east and south edges of the Wilderness, and the Prospect SPNM Area on the north slopes of Prospect Peak, north of Lassen Volcanic National Park. Being located in the center of the Swain Mountain OSV Area, the Caribou Wilderness and SPNM Areas are prone to OSV trespass. The Swain Mountain area also includes the Willow Lake Bog Botanical Area, south of Lassen Volcanic National Park. The Pacific Crest Trail crosses the eastern portion of this OSV Area from south to north. The 25.5 mile Bizz Johnson National Recreation Trail traverses from east to west through the eastern portion of the Swain Mountain OSV Area. The National Recreation Trail Database shows that cross-country skiing is the only snow use permitted on the Bizz Johnson Trail. However, OSVs are currently allowed on seven miles in the western portion of the trail.

Studies of Sierra Nevada red fox and American marten show that they frequent the Swain Mountain OSV Area in winter. Winter studies of Sierra Nevada red fox have detected them in the vicinity of Butte Lake in Lassen National Park and throughout the Swain Mountain OSV Area.

A core marten population occurs in the Swain Mountain area. Spencer and Rustigian-Romsos (2012) modeled potential habitat and movement corridors in the Cascade and Sierra Nevada regions and recommend protecting key habitat around core marten populations in the Mount Lassen-Swain Mountain-Thousand Lakes Wilderness region. In addition, movement corridors between these areas and the west slopes of the Plumas and Lassen National Forests are prioritized for marten conservation.

Desired Future Condition

- To increase number of Sierra Nevada red fox. Link the Lassen population with populations to the north via wildlife corridors. Educate winter visitors about TES Species, how to ID and report sightings, and to respect wildlife and reduce impacts to wildlife. Limit winter recreation if peer-reviewed science shows conflict.
- To maintain the population of Pacific marten. Link the Swain Mountain population with populations in Lassen National Park, Jonesville / Humboldt, and Thousand Lakes.
- To protect the Willow Lake Bog Botanical Area.
- To maintain high quality motorized winter recreation opportunities.
- To eliminate OSV trespass in the Caribou Wilderness. Apply for CA OHV funds to educate OSV visitors and monitor north, east and south Wilderness boundaries with remote sensors.
- To enhance non-motorized winter recreation opportunities near Susanville. Establish Designated Groomed OSV Trail in the Fredonyer-Goumaz Area. Create non-motorized winter use area in the vicinity of Hog Flat Reservoir. Groom Lassen County Road 101 for motorized winter recreation instead of allowing OSV use on the eastern seven miles of the Bizz Johnson National Recreation Trail.

Recommendations

Friends of Plumas Wilderness supports Alternative 5 as it limits OSV use in Sierra Nevada red fox and American marten habitat and provides a balance of motorized and non-motorized winter use opportunities. Alternative 5 allows OSV access between the Swain Mountain and Ashpan OSV Areas via Designated Ungroomed OSV Trails, yet limits open OSV riding in important winter habitat for Sierra Nevada red fox and Pacific marten. By limiting OSV use to Designated Ungroomed OSV Trails in the vicinity of the Butte Lake (Forest Road 32N21) and Table Mountain (Forest Road 32N13) Alternative 5 reduces motorized impacts on Sensitive Species and enhances non-motorized recreation opportunities. Alternative 5 prohibits off-trail OSV use in the eastern portion of Swain Mountain OSV Area yet allows snowmobile access to open riding areas via a Designated Groomed OSV Trail. Alternative 5 also restricts open OSV riding in the Hog Flat Reservoir area, a popular cross-country ski area just south of Highway 44.

Friends of Plumas Wilderness recommends restricting OSV use in the Willow Lake Bog Botanical Area. If feasible, we recommend curtailing OSV use on the Bizz Johnson National Recreation Trail and relocating motorized use to Lassen County Road 101.

We also recommend that the Lassen National Forest apply for California OHV funds to educate OSV users about Wilderness and purchase remote OSV sensors to monitor for OSV trespass along boundaries of the Caribou Wilderness.

We recommend that the Lassen National Forest educate winter recreation visitors about TES Species, how to ID them and report sightings, and how to respect wildlife and minimize impacts to TES Species. We urge that the Forest Service reduce winter recreation intensity or restrict winter recreation in areas

critical to the survival of red fox and other TES Species if peer-reviewed science shows suggests doing so will benefit the species.

Lassen Winter Use Stakeholders

Friends of Plumas Wilderness has been working with a diverse group of stakeholders interested in OSV Designation on the Lassen National Forest. Darrel Jury, President of Friends of Plumas Wilderness attended the Lassen Winter Use Stakeholder – Convened Meeting on November 7, 2017 and worked with representatives from the California Nevada Snowmobile Association, California Off Highway Motor Vehicle Recreation Commission, Pacific Crest Trail Association, Recreation Outdoors Coalition, Volcanic Legacy Community Partnership and Winter Wildlands Alliance in an effort to develop an alternative with components of Alternatives 4 and 5. Information gained at the Lassen OSV Stakeholder meeting and subsequent correspondence has been incorporated into this comment letter.

Areas where the Lassen OSV Stakeholder group found consensus include: 1) the value of providing a diversity of winter recreation opportunities, 2) the need for more accessible winter recreation information (e.g. the PCT is not shown on the Lassen Winter Recreation Map), and 3) creation of a Winter Recreation Advisory Council with representation from motorized and non-motorized groups. There was also considerable discussion about the 12” minimum snow depth and the Pacific Crest Trail. However, no consensus was reached on how to address these complex and controversial issues.

Snow Depth Standards and Winter Access Guidelines

Friends of Plumas Wilderness understands the need to establish standards and guidelines to manage recreation. Standards and guidelines for winter recreation must be able to adapt to a rapidly changing climate. Climate science in the Northern Sierra is documenting warmer temperatures, shorter winter seasons and less precipitation falling as snow, resulting in a smaller snowpack. This climate research emphasizes the need for winter recreation minimum snow depth standards as OSV enthusiasts will have less snow to play on. We understand that minimum snow depth standards will be difficult to monitor and enforce because snow depths and densities vary considerably across the landscape. We believe snow depth monitoring should focus on staging areas as these areas experience high use and are typically at lower elevations where there is less snow, thus there is typically more resource damage in these locations. In addition to snow depth standards, we believe emphasis should be placed on developing a clear and concise definition of OSV resource damage, educating motorized winter recreation visitors on ways to reduce resource damage, and enforcing infractions where resource damage occurs. A Winter Recreation Advisory Council could be convened to provide input to the Lassen National Forest on a framework for describing thresholds of conditions to allow access to OSV trails, suggestions to improve management, and dates for closing OSV trails and areas. California OHV fees could be used to fund the advisory council, snow depth monitoring, resource damage education and enforcement.

Friends of Plumas Wilderness supports Alternatives 4 and 5 in regards to snow depth standards. We understand that snow depth and density varies dramatically across the landscape but we support the establishment of a Forest-wide 12” minimum snow depth standard. We recommend establishing permanent snow transects with at least 5 snow depth monitoring locations at each OSV staging area. The average snow depth could be used to determine the snow depth at the staging area. We agree that OSV use should “be allowed only when conditions are sufficient to allow OSV use while protecting underlying resources.” We support decision making on when an area be opened or closed to OSV use be “determined by a combination of weather station data, observations at trailheads by staff, and when conditions are right to commence grooming.” We like the Lassen OSV Stakeholders Group idea of establishing a Winter Recreation Advisory Council, but would add that such a committee must be guided

by science and have winter recreation management recommendations reviewed by climate scientists and wildlife biologists.

Pacific Crest Trail

All Lassen OSV Stakeholders in attendance agree that the Pacific Crest Trail (PCT) provides unique experiences and is a valuable amenity to local communities and rural economies. PCT users' expectations would be better met if Wilderness areas were signed and the PCT were included on winter recreation maps. Designation of PCT crossings will need to consider the safety of OSV riders and minimizing resource damage. The specific location of crossings is likely to shift with changing snow conditions. Thoughtful and active sign management will be required.

Friends of Plumas Wilderness supports Alternative 5 in regards to the Pacific Crest Trail. We support the concept of reducing OSV recreation along the PCT. We also acknowledge that the PCT may serve as a wildlife corridor for mammals because the PCT discourages motorized use, is cleared of vegetation and is typically located on ridgetops.

Thank you for being the first National Forest in the nation to address OSV Designation under the 2015 OSV Planning Rule. Please contact me if you have any questions about our recommendations. I am available to meet and discuss our recommendations in detail. Friends of Plumas Wilderness looks forward to working with you to implement our recommendations.

Sincerely,

/s/ Darrel Jury

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