



May 6, 2024

California State Parks Off-Highway Motor Vehicle Recreation Grants Program

cc:

Plumas County Planning Director, Tracy Ferguson

Plumas National Forest Supervisor, Chris Carlton

Region 5 Forest Service Deputy Regional Forester, Jody Holzworth

Sierra Buttes Trail Stewardship Director of Grant Management, Michelle Abramson

RE: Claremont Phase 1 Development OHV Grant Proposal

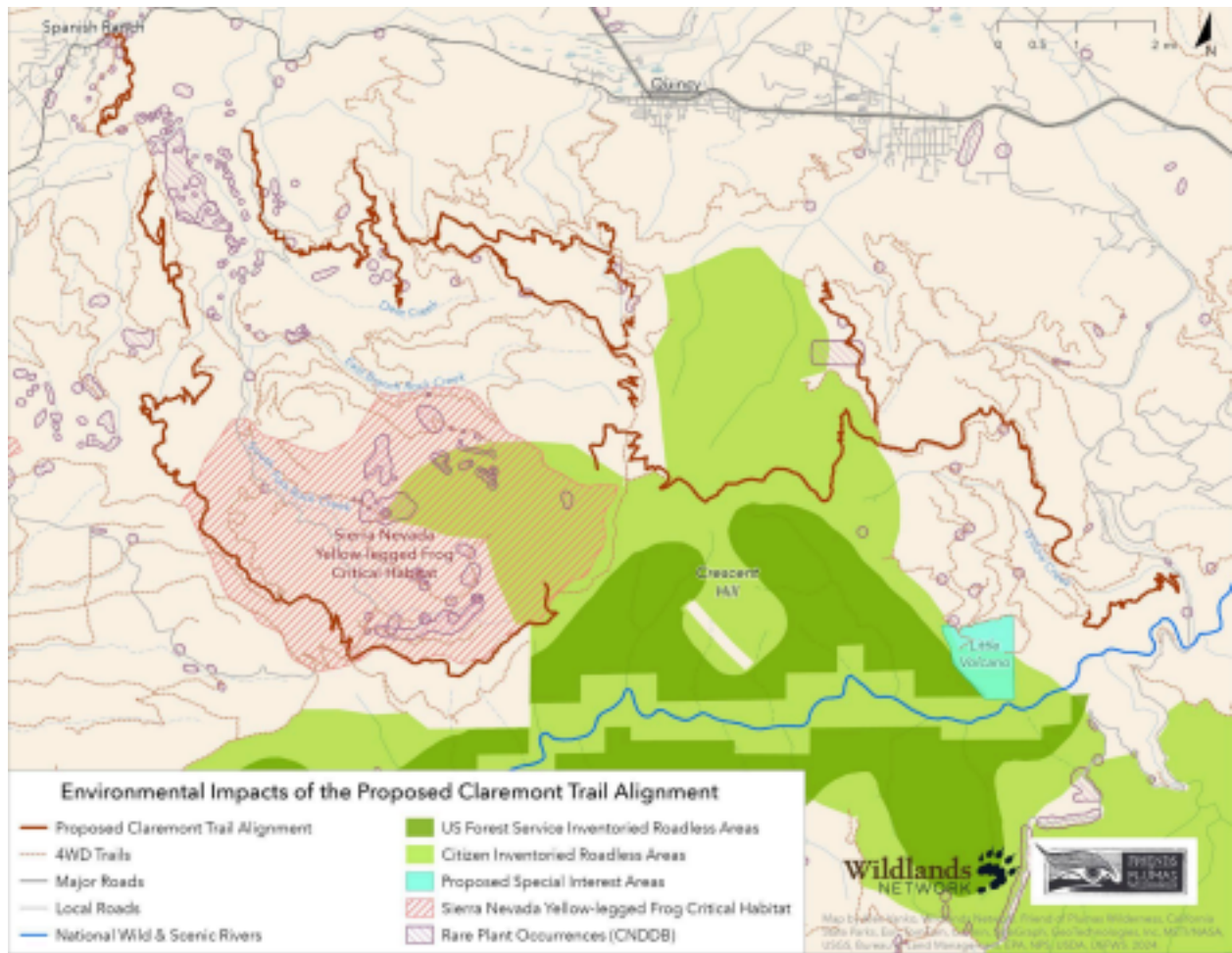
For fifty years Friends of Plumas Wildernesses (FOPW) has been dedicated to studying, exploring, and safeguarding natural ecosystems where the Sierra and Cascades meet through conservation, advocacy, stewardship, and collaboration.

The California Native Plant Society (CNPS) is a non-profit environmental organization with over 12,500 members in 36 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

Our organizations acknowledge that motorized recreation is an appropriate use of our multiple-use public lands if it does not adversely impact natural and cultural resources or other established uses. FOPW has worked with the Plumas National Forest (PNF) and Sierra Buttes Trail Stewardship (SBTS) to build trails in an environmentally considerate, long-term sustainable fashion. We greatly appreciate that SBTS has worked with FOPW in the past to improve the proposed Claremont Trail System. It is with that intent that we submit these comments.

The Claremont Phase 1 Development OHV grant proposal states: "PNF and SBTS have been partnering with Plumas County to maintain and build OHV trails... on their public lands. ... In 2019, Plumas County was granted a Planning Grant through the OHMVR Grants Program to develop a trail alignment and complete environmental assessment for the Claremont Trail System near Quincy, CA. ... The goals of the 2019 Planning Grant included identifying trail routes that **avoided any impact on resources**. ... These goals were achieved with the alignment of 62 miles of trails..." (emphasis added).

Our organizations do not believe that the trail alignment identified for Claremont Phase 1 “avoided any impact on resources” or complied with [Minimization Criteria](#) required for Off-Road Vehicle use on federal public lands. The map titled Environmental Impacts of the Proposed Claremont Trail Alignment clearly shows the route is placed within Critical Habitat of the federally Endangered Sierra Nevada yellow-legged frog and overlaps with several populations of two known rare plant species. This information is readily available to the public on the [California Natural Diversity Database](#). In addition, a short segment of the proposed alignment overlaps with the Middle Fork Citizen Inventoried Roadless Area (CIRA) identified by The Wilderness Society (TWS) in 2017. [Maps](#) of TWS CIRAs on the Tahoe and Plumas National Forest are available online. The 57,786 acre [Middle Fork CIRA](#) is the largest roadless area on the Plumas National Forest.



Our Concerns:

Segment 1

- The proposed alignment intersects with the following known locations of rare plants.
 - [Lupinus dalesiae](#), 7 populations, Rare Plant Rank 4.2

- [Monardella follettii](#), 1 population, Rare Plant Rank 1B.2

Segment 3

- The proposed alignment would add 5.15 miles of motorized trail within Critical Habitat of the federally Endangered [Sierra Nevada Yellow-legged frog](#). ● The eastern portion of Segment 3 is within the Middle Fork Citizen Inventoried Roadless Area mapped and field verified by The Wilderness Society in 2017.

Our Recommendations:

To comply with Minimization Criteria we recommend:

- Any portion of the proposed Claremont trail alignment within Critical Habitat of the federally Endangered Sierra Nevada yellow-legged frog utilize existing roads within Critical Habitat or be realigned so the route is outside of Critical Habitat.
- Any portion of the proposed Claremont trail alignment within known populations of rare plants utilize existing roads where rare plants are known to occur or be realigned so the route does not overlap with known populations of rare plants.

To retain existing roadless areas we recommend:

- The short segment of proposed trail at the eastern edge of Segment 3 utilizes existing roads to avoid encroaching into the Citizen Inventoried Roadless Area identified and field verified by The Wilderness Society.

Representatives of our organizations had the opportunity to meet with Region 5 Forest Service leadership in Sacramento on May 2, 2024. At the meeting FOPW board member Darrel Jury showed the Deputy Regional Forester Jody Holzworth a map of the Claremont Phase 1 trail alignment and the extent to which it overlaps with Sierra Nevada yellow-legged frog Critical Habitat. The Deputy Regional Forester stated that the trail should not go there. We concur, and expect that motorized trail funders and developers will respect legal requirements and Forest Service policy by realigning trail segments to avoid endangered species Critical Habitat, known populations of rare plants and Citizen Inventoried Roadless Areas.

Thank you for the opportunity to comment on the Claremont Phase 1 Development grant proposal.

Sincerely,

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