

## **Comments Regarding Sierra Buttes Trail Stewardship Connected Communities - Lost Sierra Route**

These comments were written with the help of many people who have extensive knowledge of the Upper Feather River watershed. A list of contributors and reviewers can be found at the bottom of the report. We did our best to capture our shared understanding of ecologically and culturally important areas potentially impacted by the construction of over 600 miles of trails and development of over 300,000 acres of recreation areas across portions of four National Forests. We provide recommendations on how to minimize impacts to places and values we are aware of yet understand there are many more ecologically and culturally important lands, waters, and values we have overlooked. We offer these recommendations in the spirit of informing SBTS of ecologically and culturally important lands and waters in the Feather River watershed so that the Lost Sierra Route and associated Recreation Zones and Future Planned Trail Areas are built in the most environmentally sensitive and ecologically responsible way.

### **Design Principle Recommendations**

The Design Principles below provide general recommendations we believe are essential to plan and construct the Lost Sierra Route and associated trails in the most environmentally sensitive and culturally appropriate manner.

#### Ensure environmental assessment and resource surveys are project specific

- Site specific surveys (cultural, botany, sensitive species, etc.) are needed for all proposed trail routes. Surveys that have been conducted for other proposed projects in many instances will be inadequate (both spatially and temporally).

#### Ensure environmental assessment addresses cumulative effects

- The regional scale of the project, covering four National Forests, demands that cumulative effects of the project be addressed.

#### Preserve large functioning ecosystems and watersheds

- Do not designate Recreation Zones, Future Planned Trail Areas, or construct motorized trails within US Forest Service Wilderness Areas, Wilderness Study Areas, Inventoried Roadless Areas, Semi-Primitive Non-Motorized Areas, Special Interest Areas (SIA), proposed Special Interest Areas, Wild River segments and recommended or eligible Wild River segments.
- Avoid construction of motorized trails within The Wilderness Society's Citizen Inventoried Roadless Areas.
- Minimize fragmentation when constructing motorized trails through large functioning ecosystems and watersheds (i.e. utilize existing roads or construct trails adjacent to existing roads).

#### Maintain connectivity of wildlife corridors

- Avoid construction of motorized trails within California Fish & Wildlife Natural Landscape Blocks and Essential Connectivity Areas identified in the [California Habitat Connectivity Project](#) (2010).
- Avoid construction of motorized trails within mule deer migration corridors identified by California Department of Fish & Wildlife: [Doyle Herd](#), [Loyalton Herd](#).

#### Protect rare plant associations and unique wildlife habitats

- Avoid construction of motorized trails within Portfolio Sites identified in The Nature Conservancy's [Sierra Nevada Ecoregional Plan](#) (1999).

#### Protect habitats of particular species or groups of species

- Do not construct motorized trails within Occupied Habitat of Endangered Species (e.g. Foothill & [Sierra Nevada Yellow-legged Frog](#)).
- Do not construct motorized trails within habitat designated for special status species (e.g. [California Spotted Owl](#) & Northern Goshawk Protected Activity Centers, Bald and Golden Eagle nest territories).
- Do not construct motorized trails within high use areas for other special status species and species of special concern (e.g. Sierra Nevada Red Fox, Pine Marten, Peregrine Falcon, Prairie Falcon, Osprey, [Redhead](#), [American White Pelican](#), [Northern Harrier](#), [Lesser Sandhill Crane](#), [Short-eared Owl](#), [Burrowing Owl](#), [Vaux's Swift](#), [Olive-sided Flycatcher](#), [Yellow-breasted Chat](#), [Yellow Warbler](#), [Yellow-headed Blackbird](#))

#### Protect pre-historic and historic cultural sites

- Consult with appropriate Native American Tribes and USFS Archeologists.
- Include tribes in the conversation early in the planning process.

#### Increase, do not decrease, opportunities for non-motorized recreation

- Do not change designated use of North Yuba Trail, as it is located along a recommended Wild & Scenic River.
- Do not change designated use of the Middle Creek Trail (12E08) or the Antelope – Taylor Lake Trail (11E17).

#### Develop Recreation Management and Monitoring Plans for all CC-LSR trails

- Work with stakeholders to determine key indicators of resource (e.g. user-created trails) and social conditions (conflicts between user groups).
- Establish trigger points that prompt pre-determined management actions.

## Assumptions

The table below provides estimated sizes of Proposed Recreation Zones and Future Planned Trail Areas. It is assumed that trails in Rec Zones and Future Planned Trail Areas will be stacked loop, single-track trail networks. It is assumed that the entire Connected Communities Lost Sierra Route will be motorized. It is assumed that ebikes are motorized (as determined by the USFS) and non-motorized areas include mechanized bikes. Type of Trail Use was provided by Trinity Stirling, Connected Communities Project Coordinator (personal communication 1/26/2022). We assume this information is current and accurate. Our comments reflect these assumptions.

### Estimated Acreage of Proposed Recreation Zones and Future Planned Trail Areas

Recreation Zone	Type of Trail Use	Forest(s)	Acres
Sierra Valley	Non-motorized	Tahoe	83,000
Frenchman	Motorized	Plumas	36,000
Beckwourth Peak	Non-motorized	Plumas	25,000
Lake Davis	Non-motorized	Plumas	34,000
Mohawk Valley	Non-motorized	Plumas	13,000
Mount Jura	Non-motorized	Plumas	16,000
Greenville	Non-motorized	Plumas	20,000
Butt Lake	Motorized	Plumas, Lassen	15,000
Susanville	Non-motorized	Lassen	1,000
Eagle Lake	Non-motorized	Lassen	25,000
<b>Future Planned Trail Area</b>			
Claremont	Motorized	Plumas	22,000
Colby Mountain	Non-motorized	Lassen	8,000
Stover Mountain	Non-motorized	Lassen	8,000
Fredonyer Mountain	Unknown	Lassen	8,000
<b>Total Acres</b>			314,000

## General Recommendations

[The California Fish and Wildlife Journal, Special Issue on Effects of Non-consumptive Recreation on Wildlife in California \(May 2020\)](#) has many valuable insights and recommendations we strongly support. We recommend SBTS leaders and staff become familiar with the publication and implement the suggestions on how to minimize effects on wildlife.

The article Balancing Conservation and Recreation (p.11) provides many insights pertinent to SBTS's work in our region. As SBTS has built more trails in and around Quincy, many long-time local residents have reached out to us and expressed their concerns for wildlife conservation. Concerns citizens have expressed are related to both trail design and lack of trailhead infrastructure. We are finding, "In the absence of good planning, recreation-conservation conflicts are increasing, polarizing these two stakeholder groups and eroding their natural affinity and alliance." We strongly believe if "conservation and recreation interest groups work together and conservation and recreation lands are planned and managed based on scientific research, a new opportunity emerges for a coordinated approach to protecting California's wildlife while also meeting the demand for high-quality recreational opportunities for diverse user groups."

How can effects be minimized?

- **Monitor and prevent unauthorized trail creation** - The unauthorized construction of renegade trails have led to the abandonment of the only Golden Eagle nest on the Mt. Hough Ranger District (Colin Dillingham, Mt Hough Ranger District, personal communication, March 2022). Use OHV funds to monitor the extent and use of unauthorized, user-created trails.
- **Limit nighttime access to parks and trails** - Do not promote nighttime recreation activities as most mammals are active at night and human use, light and sound pollution may affect wildlife behavior (Effects of non-consumptive recreation use on wildlife in California, May 2020, p.63).
- **Leave areas without trails** - Do not further fragment the few areas free of roads and trails. There are very few ridges without trails in our region. Leave some places where we and wildlife can wander without trails.
- **Plan access points and infrastructure carefully** - Develop a Recreation Management Plan for the entire Connected Communities - Lost Sierra Route, Recreation Zones, and Further Planning Areas. Work with stakeholders to determine access points and infrastructure placement and design.
- **Collect visitor use data** - Develop a Monitoring Plan for the entire Connected Communities - Lost Sierra Route, Recreation Zones, and Further Planning

Areas. Work with stakeholders to determine key indicators of resource (e.g. user-created trails) and social conditions (conflicts between user groups). Establish “carrying capacity” and trigger points that prompt pre-determined management actions, such as the construction of additional parking and installation of toilets.

- **Consider diverse visitor perspectives and values.** Engage all stakeholders.
- **Determine thresholds of acceptability of key indicators and social conditions** - Limits of Acceptable Change is an important concept developed by Wilderness Managers that identifies “carrying capacity” and trigger points that prompt pre-determined management actions.

### **Recreation Zone Specific Comments**

#### **Sierra Valley (Non-motorized)**

The proposed 83,000-acre Sierra Valley Recreation Zone is on Tahoe National Forest lands and includes the Antelope Valley and Smithneck Creek State Wildlife Areas. The 5,600-acre Antelope Valley Wildlife Area and the 1,400-acre Smithneck Creek Wildlife Area both provide critical winter range for the migratory Loyalton-Truckee mule deer herd. The 1990 Tahoe National Forest Land & Resource Management Plan states that the northwest portion of the proposed Rec Zone surrounding the Antelope Valley State Wildlife Area be managed to improve fish and wildlife habitat and transportation use is restricted to meet wildlife objectives. Deer collar data compiled between 2006-2017 by the California Department of Fish & Wildlife shows the proposed Frenchman Recreation Zone is within the mule deer migration corridor for the [Loyalton Herd](#). The California Department of Fish & Wildlife has made significant investments to protect habitat for the Loyalton Herd.

The 6,000-acre Bald Mountain Inventoried Roadless Area (IRA) is located on the eastern edge of the proposed Sierra Valley Rec Zone. The 1,061-acre Babbitt Peak Research Natural Area is located within the Bald Mountain IRA. Research Natural Areas (RNAs) are areas that the Forest Service has designated to be permanently protected and maintained in a natural condition. Natural areas include unique ecosystems or ecological features; rare or sensitive species of plants and animals and their habitat. Target elements of the Babbitt Peak RNA are Washoe pine and mountain mahogany. Prairie Falcon and Northern Goshawk are special status wildlife species found here. The Tahoe Forest Plan states that the RNA be managed to establish representative vegetation and geologic areas for scientific and educational research.

The Tahoe Forest Plan identifies Smithneck Creek and the western and southern portions of the proposed Rec Zone as areas managed for a predominantly natural-appearing landscape and late successional wildlife habitat.

Management direction for the remainder of the proposed Rec Zone is to intensively manage timber and forest resources.

The Tahoe Forest Plan does not appear to address the numerous petroglyphs located within the proposed Rec Zone.

**We are adamantly opposed to the creation of the proposed Sierra Valley Recreation Zone as we have concerns that motorized recreation development will degrade high value mule deer habitat. We strongly recommend approximately 19,000-acres in the northwestern portion of the proposed Recreation Zone be eliminated as recreation goals conflict with state and federal wildlife management objectives. We recommend that approximately 10,000-acres east of Sierra County Road 560 (Bald Mountain IRA and Babbitt Peak RNA) be eliminated from the eastern portion of the proposed Rec Zone and that the Lost Sierra Conceptual Route avoid these areas as recreation goals conflict with roadless area, scientific, and educational research objectives. If the Tahoe National Forest supports recreational development of the area, we strongly recommend that OHV funds be used annually to monitor deer migration patterns and recreation use. If recreation use negatively impacts deer migration, use should be curtailed.**

### **Frenchman (Motorized)**

We have serious concerns about the SBTS proposal to develop a motorized trail network in the Frenchman Recreation Zone. The proposed 36,000-acre Recreation Zone encompasses private lands owned by Feather River Land Trust and public lands with special designations that are incompatible with motorized recreation.

The proposed Recreation Zone lies within the eastern portion of the Plumas National Forest Land & Resource Management Plan - Frenchman Management Area (#42) and southern portion of the Escarpment Management Area (#43). The existing Recreation Area (Rx-5) is only 4,921 acres in size. Increasing the Rec Zone to 36,000-acres is a more than 7-fold increase.

The Snow Lake - Adams Peak area provides critical fall and spring transition range for migrating mule deer. Forest Plan direction is to maintain or enhance deer winter and intermediate range for the Doyle deer herd. Deer collar data compiled between 2016-2019 by the California Department of Fish & Wildlife shows the proposed

Frenchman Recreation Zone is within the mule deer migration corridor for the [Doyle Herd](#). The state of California has made significant investments to protect habitat for the Doyle Herd.

Cultural resources on the eastern escarpment of the Diamond Mountains include numerous petroglyphs sites.

The majority of the area is underlain by granitic soils that are highly erodible and risk of landslides is moderate to high. Most of the area burned at high severity in 2021 with the Beckwourth Complex Fires.

The 5,294-acre [Adams Peak Inventoried Roadless Area](#) is located within the eastern portion of the proposed Rec Zone. The [2001 Roadless Rule](#) prevents the construction of roads and motorized trails within Inventoried Roadless Areas. Plumas National Forest Plan direction is to maintain the semi-primitive character of the Adams Peak Area.

In 2017, The Wilderness Society completed field surveys of roadless areas on the Plumas National Forest and identified the 7,764-acre Adams Peak Citizen Inventoried Roadless Area (CIRA) completely within the proposed Frenchman Motorized Recreation Zone and the 10,829-acre Crystal Peak CIRA, which is partially within the proposed Rec Zone.

The eastern half of the 1,500-acre Little Last Chance Canyon Scenic Area is located within the proposed Rec Zone. This scenic canyon provides nesting habitat for Peregrine and Prairie Falcon. Little Last Chance Creek is an eligible Wild & Scenic River.

Feather River Land Trust is deeply invested in the area between Frenchman Lake and Highway 395. In 2016, FRLT purchased a conservation easement on the 5,530-acre Puma Robles Ranch, located immediately east of the proposed Frenchman Rec Zone. Motorized vehicle trespass onto private lands of the Puma Robles Ranch has significantly increased in the last few years. In 2021, FRLT acquired the 1,640-acre Spring Creek Ranch, located in the west-central portion of the proposed Recreation Zone.

**We are strongly opposed to the creation of the proposed Frenchman Recreation Zone as motorized recreation development is incompatible with existing wildlife management and roadless area management objectives. There are many private and public land values in the proposed Recreation Zone that would be lost or severely impacted by motorized recreation development and promotion.**

Other organizations that have deep ties to lands within the proposed Frenchman Recreation Zone which should be consulted include: Maidu Summit Consortium, Washoe Tribe of Nevada and California, and Backcountry Hunters and Anglers.

### **Beckwourth Peak (Non-Motorized)**

The proposed 25,000-acre Beckwourth Peak Recreation Zone is south of Portola and includes public lands on the Plumas (10,000 acres) and Tahoe (15,000 acres) National Forests. The Beckwourth Peak Trail is an approved single-track non-motorized trail that is currently under construction.

The northeastern portion of Plumas National Forest lands include the Wild & Scenic Middle Fork Feather River. Maidu grinding rocks are located on the south side of the river in the Ross Ranch Meadow area. Management of this area must be consistent with the Wild & Scenic Rivers Act and protect cultural resources.

Peregrine and Prairie Falcon nesting sites are located in the vicinity of Beckwourth Peak. FRLT has identified numerous Habitat Connectivity Corridors in the northeastern portion of the proposed Rec Zone.

On Tahoe National Forest lands south of Beckwourth Peak the resource management emphasis is watershed protection and restoration. Emphasis species include Prairie Falcon, Peregrine Falcon, and deer - there is a small resident deer herd in Carman Valley. The California Department of Fish and Wildlife (CDFW) recently identified one of California's three gray wolf packs, known as the Beckwourth Pack, within this area. Several prehistoric and historic cultural sites have been identified in the area. Off-Highway Vehicle use is on designated routes only.

**Any proposed recreation development projects in this area should be coordinated with FoPW, FRTU, FRLT and CDFW and avoid important wildlife habitat (Habitat Connectivity Corridors and Prairie and Peregrine Falcon nesting sites, important deer habitat, gray wolf habitat, den site, and territory) and cultural sites.**

### **Lake Davis (Non-Motorized)**

The proposed 34,000-acre Lake Davis Recreation Zone includes public lands within the Smith Peak State Game Refuge and lands surrounding Lake Davis. The majority of the proposed Lake Davis Recreation Zone lies within the Lake Davis Management Area (#37) identified in the Plumas National Forest Land & Resource Management Plan. The



existing Recreation Area is 10,643 acres (Rx-5) with a 120-acre Developed Recreation Site (Rx-6).

The Lake Davis Area has a significant Bald Eagle habitat (2,237 acres - Rx-11). The area between the Crocker Guard Station and Bagley Pass is important habitat for Flammulated Owls and Plumás National Forest Wildlife Biologists have expressed concerns about the construction of recreational trails in this area. FRLT has identified numerous Habitat Connectivity Corridors in the southern portion of the proposed Rec Zone. The private lands of the Smith Peak State Game Refuge contain the most important fawning habitat for the Doyle deer herd (CDFW, Syd Kahre, unpublished data). Deer collar data compiled between 2016-2019 by the California Department of Fish & Wildlife shows the proposed Lake Davis Recreation Zone is within the mule deer migration corridor for the [Doyle Herd](#). The state of California has made significant investments in this area to protect habitat for the Doyle Herd.

The Wilderness Society has identified the 6,185-acre Bagley Peak Roadless Area which extends northwest from the Crocker Guard Station along Turner Ridge to Bagley Pass. The Wilderness Society report states: “no non-motorized or motorized trails exist in the Bagley Peak Roadless Area.”

**We strongly oppose the development of new trails within [Doyle Mule Deer Migration Corridors](#). We have concerns related to increasing trail densities within the Smith Peak State Game Refuge. We strongly encourage the Plumás National Forest to work with the California Department of Fish & Wildlife to better manage motorized use within the Smith Peak State Game Refuge. To minimize impacts on important wildlife habitat (mule deer migration corridors and fawning habitat, Habitat Connectivity Corridors and Bald Eagle and Northern Goshawk nesting sites) we recommend that the Plumás National Forest reduce road and trail densities in the Smith Peak State Game Refuge. We do not support the development of motorized or mechanized trails within the 6,185-acre Bagley Peak Roadless Area identified by The Wilderness Society. We are interested in working with SBTS to envision how the Lake Davis Recreation Area could be managed to protect recreation values and conservation values (e.g. withdrawn from mineral entry and harvesting of timber).**

### **Mohawk Valley (Non-Motorized)**

The proposed 13,000-acre Mohawk Valley Recreation Zone includes approximately 1,600 acres of the Lakes Basin Recreation Area. The Lakes Basin Recreation Area was established in 1926 by the Secretary of Agriculture, requiring that the area be used for

recreation purposes and that other uses not impair the recreational values. Most, but not all of the area has been withdrawn from mineral entry and harvesting of timber.

Plumas Forest Plan direction for the Lakes Basin Area is Semi-Primitive (Rx-8:13,600 acres), Recreation Area (Rx-5: 12,000 acres) and Developed Recreation Sites (Rx-6). The Plumas Forest Plan recommends that the Secretary of Agriculture increase the size of the Lakes Basin Recreation Area to include Frazier Creek.

The eastern portion of the proposed Mohawk Valley Rec Zone is within the Haskell Management Area (#39) which extends south from Clio and east from the Gold Lake Highway to the Forest boundary. The area has roads but access to the lower slopes of the ridge is limited by private ownership. The area provides important summer and winter range for the Sloat deer herd. Important cultural resources include petroglyphs near Frazier Falls.

The area below the Mohawk-Chapman Road has numerous California Spotted Owl (CASPO) and Northern Goshawk (NOGO) Protected Activity Centers (PACs). Federally Endangered Sierra Nevada Yellow-legged Frog (SNYLF) populations exist in Goose and Haven Lakes on the Tahoe National Forest. Pacific marten are found within the proposed Mohawk Valley Rec Area along the Pacific Crest Trail.

FRLT has identified numerous Habitat Connectivity Corridors in the northern portion of the proposed Mohawk Valley Rec Zone.

**We strongly recommend removing the portion of the Mohawk Valley Rec Zone below the Mohawk-Chapman Road to avoid trail development near CASPO and NOGO PACs. Trail development should be avoided in the vicinity of Goose and Haven Lakes. If visitor use impacts demand concentrating use around Goose and Haven Lakes, consider constructing an elevated boardwalk. Any proposed recreation development projects in this area should be coordinated with FoPW, FRTU, and FRLT to avoid important wildlife habitat (Habitat Connectivity Corridors) and cultural sites.**

### **Mount Jura (Non-Motorized)**

The proposed 16,000-acre Mount Jura Recreation Zone is east of Taylorsville and the North Arm of Indian Valley. The Rec Zone is within the east side of the Lights Creek Management Area (#28) in the Plumas National Forest Land & Resource Management Plan. The proposed Rec Zone extends north from Indian Creek in Genesee Valley near Mt. Jura to Rattlesnake Peak.

The western edge of the Rec Zone abuts the Taylorsville Campground, which is a significant religious site for Mountain Maidu and has remnants of a roundhouse.

Approximately 1,600-acres at the southernmost portion of the proposed Mount Jura Rec Zone overlays the 19,140-acre Mount Jura Roadless Area identified by The Wilderness Society. The proposed Mount Jura Rec Zone overlays the majority of the 10,623-acre Peter's Creek Roadless Area identified by the Wilderness Society. Numerous OHV trails (11M29, 11M30, 11M33) exist within the Citizen Inventoried Roadless Area.

The Plumas County General Plan has detailed information regarding the development of trails within the Genesee Valley Special Management Area. In general, the intent is to "maintain roadless character of Grizzly Ridge, Indian Creek, Last Chance, and Red Clover canyons". "In the Genesee Valley Special Management Area off-road recreation use shall be limited to non-motor vehicle... uses such as hiking, fishing, camping, bicycling, horseback riding or packing with animals". "All trails will be for non-motorized use."

The northeast edge of the proposed Mt. Jura Rec Zone abuts the 500-acre Mud Lake Unit of the Mud Lake Research Natural Area (RNA). The target element for this RNA is Baker cypress, a globally rare species with fewer than a dozen populations found only in Northern California and Southern Oregon. Baker cypress is listed as a Vulnerable species by the International Union for the Conservation of Nature (IUCN) as a Red List Threatened Species with a decreasing population trend. Plumas National Forest recreation direction for Research Natural Areas (Rx-17) is to manage recreational use according to the Recreation Opportunity Spectrum class of Semi-Primitive Non-Motorized and prohibit recreational uses that would contribute to modification of the area and maintain existing trails but do not expand the trail system.

**We recommend that 1,600-acres south of 10M48 & 10M32 be eliminated from the Mt. Jura Rec Zone to maintain the option of the Mount Jura Roadless Area to be designated as Wilderness. We strongly suggest that SBTS consult with Maidu Summit Consortium and the Greenville Rancheria prior to developing any recreation plan for the Taylorsville Campground area because of the cultural significance of the Mountain Maidu roundhouse found here.**

### **Greenville (Non-Motorized)**

The proposed 20,000-acre Greenville Recreation Zone is located on the Plumas National Forest south of Keddie Ridge within the northern portion of the Indian Valley Management Area (#27) and the west side of the Lights Creek Management Area (#28).

The Keddie Ridge Roadless Area (Rx-8: 3,000-acres) is located in the western portion of the proposed Rec Zone. The Homer-Deerheart Lake Special Interest Area is located north of the Keddie Ridge Roadless Area on the Lassen National Forest. Frequent motorized vehicles trespass within the SIA has resulted in damage to natural and cultural resources. Keddie Peak is the cultural center of the Maidu universe in their origin story. The south-central portion of the proposed Greenville Rec Zone abuts the Greenville Rancheria.

**We propose that approximately 3,500-acres north and west of 28N38 be eliminated from the proposed Greenville Recreation Zone as recreation development is incompatible with the protection of cultural values and roadless area objectives. We highly recommend that SBTS consult with Maidu Summit Consortium and the Greenville Rancheria prior to developing any recreation plan for the Greenville Rec Zone.**

#### **Butt Lake (Motorized)**

The proposed 15,000-acre Butt Lake Recreation Zone includes lands on the Plumas National Forest (10,000-acres) and Lassen National Forest (5,000-acres). Lands on the Plumas National Forest fall within the Butt Lake Management Area (#26). The existing Recreation Area is 1,940-acres. Significant portions of the Management Area have prescriptions for Bald Eagle Habitat (Rx-11: 5,331-acres) and Spotted Owl Habitat (Rx-12: 7,788-acres).

**Any proposed recreation development projects in the area should avoid important wildlife habitat (Bald Eagle and Spotted Owl habitat). We strongly suggest that Maidu Summit Consortium be consulted prior to any recreation development in the Butt Valley area as it has significant cultural value to the Mountain Maidu.**

#### **Susanville (Non-Motorized)**

The proposed Susanville Rec Zone overlays Susanville Ranch Park, a 1,100-acre property owned and managed by Lassen County and the Bureau of Land Management as a shared-use recreation area. Lassen Land & Trails Trust promotes the 30 miles of non-motorized, multi-use trails in Susanville Ranch Park, as well as the Bizz Johnson and Modoc Line trails. Ranch Parks trails are ideal for hiking, mountain biking, horseback riding, walking, and cross country skiing and snow-shoeing in the winter.

**We strongly support the collaborative work done by Lassen County, BLM, and Lassen Land & Trails Trust to develop non-motorized trails close to communities like those in the Susanville Ranch Park.**

### **Eagle Lake (Non-Motorized)**

The proposed 25,000-acre Eagle Lake Recreation Zone is located on Lassen National Forest lands on the west side of Eagle Lake. The 1992 Lassen National Forest Land & Resource Management Plan identifies the Eagle Management Area (#14). The existing Developed Recreation Area is 125-acres.

Eagle Lake is home to one of the largest wintering populations of Bald Eagles in California. It is not uncommon to see 50-60 individuals a day in December and January. Four Bald Eagle territories and one Northern Goshawk territory are located within the Eagle Management Area. A special Osprey Management Area was established on Forest land at Brockman Flat and a management plan was written in 1971. Other emphasis species in the Eagle Management Area include Pileated Woodpecker, Sandhill Crane, mule deer, and pronghorn. Sensitive plants include Egg Lake monkeyflower (*Mimulus pygmaeus*). Important cultural resources include rock rings, petroglyphs, pictographs, and historical cabins.

**We recommend eliminating the Osprey Management Area from the proposed Eagle Lake Recreation Zone to protect Osprey, Bald Eagle, and Sandhill Crane habitat.**

### **Future Planned Trail Areas**

#### **Claremont (Motorized)**

The 22,000-acre Claremont Future Planned Trail Area is located south of Quincy and east of Meadow Valley on Plumas National Forest lands. The proposed Rec Zone is in the northern portion of the Third Water Management Area (#22) and the western portion of the Volcano Management Area (#24). The proposed single-track, motorized Claremont Trail is entering CEQA/NEPA analysis.

The Third Water Management Area is south of Meadow Valley and extends east to near Claremont Peak. Recreation direction within the Management Area is to maintain the character of the Middle Fork semi-primitive area (Rx-8). Wildlife emphasis is to maintain or enhance deer winter range for the Sloat herd. The area provides habitat for Northern Goshawk.

The Volcano Management Area is south of Quincy to the Middle Fork Feather River. Recreation direction is to protect the Middle Fork of the Feather River and manage Scenic and Wild Zones consistent with the Wild & Scenic Rivers Act and to maintain the character of the Middle Fork semi-primitive area (Rx-8). Wildlife emphasis is to maintain or enhance deer winter range for the Mooretown and Sloat herds. The area provides habitat for California Spotted Owl and Northern Goshawk.

The Claremont Future Planned Trail Area encompasses the 500-acre proposed Little Volcano Special Interest Area. The area contains a unique limestone monolith with caves. Forest Plan direction for minerals is to protect unique geologic and scenic values and recommends withdrawal of the Little Volcano Area from mineral entry.

**Trail specific comments were submitted to SBTS Trails Program Manager, Mandy Beatty on March 22, 2022. We are adamant that SBTS does not construct a bridge across Rock Creek and develop a motorized trail in this unroaded area. To protect Wild & Scenic River values, we demand that no motorized trail development be allowed within the Wild & Scenic River Zone. We strongly recommend that areas south of the Willow Creek Trail (24N26) and Bachs Creek Ridge be eliminated from the Planned Trail Area. We also recommend that the area west of the Slate Creek Road (24N28) and Spotted Owl Protected Activity Centers on Rock Creek be eliminated from the Planned Trail Area.**

#### **Colby Mountain (Non-Motorized)**

The proposed 8,000-acre Colby Mountain Future Planned Trail Area envelops the Colby Mountain Recreation Project, a multi-use, non-motorized 40-mile trail network near Jonesville on the Lassen National Forest in the mountains above Chico. In 2021, Sierra Nevada Conservancy provided Butte County Resource Conservation District with \$271,000 to fund environmental compliance and trail layout. In 2022, \$1,000,000 of American Rescue Plan Act (ARPA) funds were awarded to Butte County for the Colby Mountain Recreation Project to construct 20 miles of multi-use, non-motorized singletrack trail. Future plans are to link the Colby Mountain Recreation Project to Chester as a part of SBTS's Connected Communities trails master plan.

The Connected Communities Lost Sierra Concept Route map shows non-motorized trails being developed by Butte County linking with motorized trails proposed by SBTS via the ridge between Butt Creek and Yellow Creek.

The proposed Lost Sierra Route linking Colby Mountain non-motorized trails with SBTS motorized trails is located within the Lassen National Forest Land & Resource Management Plan (1992) Butt Creek Management Area (#37). Recreation direction is to develop a trailhead for the Pacific Crest Trail at the intersection with the Humboldt Road. The area is currently used for dispersed camping and is a popular campsite for PCT through-hikers.

**We strongly recommend that the Lost Sierra Route connection with the non-motorized Colby Mountain Recreation Project be non-motorized to maintain the natural and scenic qualities of the PCT. We suggest that trailhead development at Humboldt Summit not displace PCT through-hiker camping opportunities or degrade the wild and scenic character of the PCT.**

#### **Stover Mountain (Non-Motorized)**

The 8-000 acre Stover Mountain Future Planned Trail Area is located on Lassen National Forest and private lands west of Chester. The Stover Mountain Area is within the Feather River Management Area (#28) of the Lassen Land & Resource Management Plan. The Pacific Crest National Scenic Trail crosses the area west of Stover Mountain. Part of the Wild Cattle Mountain Further Planning Area, which is recommended for Wilderness, is in the Management Area. The 110-acre Willow Lake Bog Botanical Special Interest Area is also in the Management Area.

**We recommend that the west-facing slopes of Stover Mountain be eliminated from the proposed Future Planned Trail Area to insure that recreation development does not conflict with management direction for the Pacific Crest National Scenic Trail.**

### **Fredonyer Mountain (Unknown)**

The 8,000-acre Fredonyer Mountain Future Planned Trail Area is located on the Lassen National Forest within the Willard Management Area (#32). Two Spotted Owl and two Northern Goshawk territories have historically been located in this area. A Fisher Habitat Management Area has been established in this area.

**We recommend that the Fredonyer Mountain Future Planned Trail Area boundary be adjusted to exclude Spotted Owl, Northern Goshawk, and Fisher habitat if found within the current boundaries.**

### **Lost Sierra Concept Route (Motorized)**

#### **Grizzly Ridge**

The Plumas National Forest Land & Resource Management Plan - Grizzly Ridge Management Area (#23) provides management direction for Grizzly Ridge. Recreation direction is to protect and enhance hiking and cross-country skiing opportunities on the top of Grizzly Ridge.

The [Grizzly Peak Inventoried Roadless Area](#) is within the Ward Management Area (#30). Recreation management direction is to maintain the character of the 7,000-acre Grizzly Peak semi-primitive area (Rx-8) and protect and enhance hiking and cross-country skiing opportunities on the top of Grizzly Ridge. Off-Road Vehicle direction is to allow ORV's wherever user conflict or resource damage is unlikely. The Plumas Forest Plan identifies Devil's Punchbowl as a Special Area and management direction is to maintain its scenic quality.

Grizzly Ridge is identified by California Fish & Wildlife as a Natural Landscape Block in the 2010 California Essential Habitat Connectivity Project. In 1991, The California Native Plant Society identified the 1,466-acre Brady's Camp Proposed Botanical Special Interest Area. The Brady's Camp meadow complex has extremely high species diversity with seven plant communities represented and contains herbaceous plants from both the northern Sierra and Great Basin floristic provinces. Forest Champion lodgepole pine and western white pine are recognized within the Brady's Camp site. The Proposed SIA also contains a population of the Forest-endemic *Penstemon personatus*, the rare *Carex sheldonii*, and has potential habitat for *Silene invisa*. As part of a CNPS appeal of the Plumas National Forest Land & Resource

Management Plan, the Plumas National Forest is required to consider Proposed Botanical Special Interest Areas during NEPA planning.

**Given Plumas National Forest Land & Resource Management Plan and California Department of Fish & Wildlife direction, We recommend aligning the Lost Sierra Route on or in close proximity to 25N29 and 24N19 to minimize fragmentation of large landscape blocks, minimize impacts to the sensitive botanical resources found within Grizzly Peak IRA and Brady's Camp Proposed SIA, and protect hiking, cross-country hiking and skiing opportunities on top of Grizzly Ridge.**

#### **Reconnaissance Peak - Bald Rock Area**

The area between Reconnaissance Peak and Bald Rock is a prime deer fawning area that is identified as a Natural Landscape Block in the California Essential Habitat Connectivity Project. Deer collar data compiled between 2016-2019 by the California Department of Fish & Wildlife shows the area between the proposed Frenchman and Lake Davis Recreation Zones is within the mule deer migration corridor for the [Doyle Herd](#).

The Wilderness Society has identified the 21,027-acre Horton Ridge Roadless Area which extends northwest from Reconnaissance Peak to Dixie Creek. The area provides unique opportunities for hiking off-trail and is one of the largest unroaded habitat blocks on the Plumas National Forest. Construction of a motorized trail is incompatible with existing public land values found in this area.

**To avoid impacts on prime deer fawning areas, minimize fragmentation of one of the largest natural landscape blocks on the Plumas National Forest, and maintain unique off-trail hiking opportunities we are adamant that the Lost Sierra Route does not bisect the 21,027-acre Horton Ridge Roadless Area.**

#### **Diamond Mountains**

The Diamond Mountains between Milford and Diamond Mountain have numerous special designations and harbor many natural and cultural values that are incompatible with motorized recreation. Plumas National Forest direction in the Escarpment Management Area (#43) is to maintain the semi-primitive character of the 2,000-acre Thompson Peak Semi-Primitive Area (Rx-8). Forest recreation direction in the Antelope Management Area (#29) is to restrict wheeled vehicles to existing roads in the Diamond Mountain ORV Closure Area as shown on the Off Road Vehicle Closure Plan. A map of the approximately 13,500-acre Limited Vehicular Access Area is shown in Figure 4-9 on page 4-292 of the 1988 Plumas National Forest Land & Resource Management Plan.

The California Native Plant Society has identified the 2,167-acre Eastern Escarpment Proposed Special Interest Area along the Diamond Mountains south of the Thompson Peak and east of the Janesville Grade. The north slope of the escarpment has experienced limited disturbance and conifers at the low rainfall site have smaller than normal cones, indicating site specific adaptations. The CNPS suggests that the area may qualify as a Research Natural Area.



The Wilderness Society has identified the 5,083-acre Cottonwood Peak Citizen Inventoried Roadless Area. The CIRA extends along the Diamond Mountains from two miles south of Cottonwood Peak to the southern border of the Eastern Escarpment Proposed Special Interest Area.

**We have serious concerns with the development of a motorized trail along the entire crest of the Diamond Mountains. The area has many natural and cultural values that are incompatible with motorized recreation. New trails should not be constructed within [Doyle Mule Deer Migration Corridors](#), existing roadless areas identified by The Wilderness Society including: Adams Peak Inventoried Roadless Areas, Cottonwood Peak and Crystal Peak Citizen Inventoried Roadless Areas. To minimize impacts to mule deer habitat, roadless areas, botanical areas, semi-primitive areas, and limited access OHV areas, we recommend aligning the proposed Lost Sierra Route west of the Thompson Peak Semi-Primitive Area, Eastern Escarpment Proposed Special Interest Area, Cottonwood Peak Roadless Area, and east of the Diamond Mountain Limited Vehicular Access Area.**

#### **McRae Meadows / Nelson Creek**

The California Native Plant Society identified the 6,869-acre McRae Meadows / Nelson Creek proposed Botanical Special Interest Area as it has an extensive Montane Meadow free of livestock grazing and surrounding timberlands that support a diverse array of unique plants and animals. Extensive willow formations have supported populations of Willow Flycatcher. The southern portion of the proposed SIA supports two Spotted Owl Habitat Areas. Surrounding steeply sloping red fir forests contain habitat for the rare *Silene invisa*. Potential champion lodgepole pine are found near the primitive camp at the south end. Immense sugar pines and western white pine can be found within the SIA. Nelson Creek is a state-designated Wild Trout Stream and eligible Wild & Scenic River, and the proposed SIA would contain its headwaters. Motorized route 10M8 is located along the east and north bank of the East Branch of Nelson Creek.

**To minimize impacts to botanical resources within the proposed SIA, we recommend that the alignment of the Lost Sierra Route be on or in close proximity to 23N08 and 23N09.**

### **State Game Refuges**

California State Game Refuges were established on public and private lands in the 1910s to enhance deer populations in certain parts of California by creating “no hunting” zones. In 2010, the California Department of Fish and Wildlife proposed eliminating State Game Refuges, arguing they are not administered by the CDFW, are not managed to benefit wildlife, have not been an effective tool in achieving deer herd management goals, and modern regulatory

mechanisms and protections are adequate. Public outcry to maintain California State Game Refuges effectively stopped CDFW's plan to eliminate them.

The Plumas National Forest has not managed State Game Refuges under their administration to benefit wildlife. We believe that State Game Refuges can be an effective tool to achieve deer herd management goals if the US Forest Service worked with the CDFW and managed them to benefit wildlife. User-created motorized trails on the Mt. Hough Ranger District within the Mt. Hough State Game Refuge became the foundation of the South Park trail network. These close to town trails provide many benefits for community members and public land visitors but have negatively impacted sensitive wildlife populations. User-created non-motorized trails associated with the South Park trail network displaced the only nesting pair of Golden Eagles on the Mt. Hough Ranger District.

There are four State Game Refuges within the proposed area of Connected Communities trail developments: Mt. Hough, Dixie Mountain, Smith Peak, and Johnsville. All of these State Game Refuges are on lands administered by the Plumas National Forest.

**To better manage wildlife in California State Game Refuges, we strongly recommend the Plumas National Forest reduce road and trail densities within the Dixie Mountain and Smith Peak State Game Refuges and not construct any more trails in winter deer range within the Mt. Hough State Game Refuge.**

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