



September 8, 2026

USDA Forest Service; Docket Number: FS-2026-0100

Attn: Travel Management Rule Revision; re: Comments on the Proposed Revision to the Travel Management Rule (36 CFR part 212), Specific impacts on the Upper Feather River Watershed and Plumas National Forest

For over five decades, Friends of Plumas Wilderness has advocated for sustainable low-impact recreation and access to our public lands in the Upper Feather River Watershed. We are now writing to express our strong opposition to the proposed revisions to the Travel Management Rule. The 2005 rule was a historic, bipartisan compromise that brought crucial order to federal lands by requiring motorized vehicles to stay on designated routes. Travel management keeps public lands accessible and usable for everyone because it provides the basic "rules of the road" for public lands. It protects motorized access by creating clear, legal, dependable routes and ensures that hikers, hunters, anglers, horseback riders, mountain bikers, families and wildlife are not pushed aside by unmanaged vehicle use. The sustainable and well-designed and designated network of roads and trails that have been managed under this rule for the past 21 years have successfully supported motorized recreation while protecting wildlife, clean water, cultural resources, hunting and fishing, quiet recreation, and other public-land values. Reverting to an "open by default" policy ignores extensive peer-reviewed conservation science. Unmanaged motorized recreation causes severe environmental damage, including accelerated soil erosion, the spread of invasive species, and the degradation of critical watersheds. We urge the Forest Service to maintain the 2005 Travel Management Rule framework and protect the ecological integrity of our shared wilderness.

Furthermore, the proposal to eliminate the "minimization criteria" requiring managers to minimize the impact of roads and trails on natural resources, endangers vulnerable



wildlife. How we travel on public lands shapes the quality of wildlife habitat. Roads and trails don't just provide access for people. They influence how wildlife experience and move across the landscape. Scientific consensus demonstrates that motorized route density directly correlates with habitat fragmentation and that increased fragmentation reduces biodiversity. It disrupts migration corridors and displaces sensitive species. At a time when biodiversity is facing unprecedented stress from climate change, expanding motorized access into previously secure habitats is ecologically irresponsible.

The Plumas National Forest has been under immense stress from catastrophic wildfires, climate change, and habitat fragmentation. Reverting to an "open by default" policy ignores extensive peer-reviewed conservation science. Of paramount concern is the threat this proposal poses to the Upper Feather River watershed, 65% of which is managed by the US Forest Service. This watershed is not only an ecological treasure but also serves as a vital source of clean water for millions of Californians. Unmanaged travel will directly jeopardize the fragile headwaters, streams, and meadows of the Upper Feather River, while accelerating the decline of several highly vulnerable species that rely on the unique ecosystems of the region. The Sierra Nevada Yellow-Legged Frog is a critically endangered amphibian that relies on pristine high-elevation aquatic habitats. Reopening or expanding unmonitored motorized routes near streams, meadows, and lakes will accelerate soil erosion, introduce toxic vehicle runoff, and destroy the fragile riparian zones vital to this species' survival. The Northern Fisher is a rare and elusive carnivore species that requires large, contiguous blocks of mature forest canopy. An influx of off-road vehicles into previously unmotorized zones will further fragment its territory, pushing it closer to extinction. Both the California Spotted Owl and the Northern Goshawk are sensitive raptors that depend on quiet, interior forest habitats for successful nesting and foraging. An increase in motorized noise pollution during critical breeding seasons will disrupt nesting pairs and lower reproductive success.

The Forest Service faces a multi-billion-dollar deferred maintenance backlog for its existing road and trail network. Presuming all routes open by default will inevitably lead to user-created trails that the Plumas National Forest has neither the budget nor the staff to monitor, maintain, or restore. This policy shift will burden taxpayers and



severely degrade the quiet, non-motorized recreation experiences, such as hiking, backcountry hunting, and wildlife viewing that define this region and substantially contribute to the small rural economies of Plumas County. The negative impacts to wildlife will also adversely impact the anglers and hunters who help balance these fragile ecologies.

The Forest Service's mandate is to sustain the health, diversity, and productivity of the nation's forests for present and future generations. This proposal prioritizes short-term motorized convenience over long-term ecological survival. Revoking this rule will negatively affect many people, the very "public" that the USFS mandate claims to be for. We urge the agency to reject these changes, uphold the 2005 Travel Management Rule, and continue prioritizing science-based management that protects wilderness and wildlife, for generations to come.

Thank you for considering these comments.

Sincerely,

Friends of Plumas Wilderness