Plumas National Forest Motorized Travel Management FEIS / DEIS Comments and Response to Comments

Letter 1

Attributes

Attribute	Value
Early Attention	Provides proposals for new alternatives
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Public Involvement

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

SAC [Sierra Access Coalition] has been working with the Forest Service since the Interdisciplinary Team was appointed in 2007. Representatives from SAC have been present at every public meeting beginning in 2003 (before the ID team was even convened) at which time the plan was presented to the public as an OHV plan only for motorcycles and quads. The Forest Service later defined OHVs as any motorized vehicle, including cars, trucks, and 4x4s, much to the public's surprise. After the original scoping in 2003, the Forest Service added dispersed camping, fuelwood cutting, game retrieval, and other dispersed recreation to the process which came as another surprise. Over the past 6 years, there have been continual changes in the project intent and process that have made it hard for the general public to keep informed.

Response

Your comment has been noted.

Comment 2

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

When the majority of roads on the Plumas were created, they were built for logging, fire access, and other land management uses and were authorized by the Forest Service. The fact that they were never added to the transportation system does not make them "unauthorized", "illegal", or "user created". On page 4-11 paragraph 2 of the Plumas LMP it states, "the logging road construction program would provide more hunting, fishing and ORV access". In the LMP, logging roads were intended and planned to be built for multiple uses. Now these routes are being called "unauthorized", "illegal", or "user created", when in fact the majority were planned and supported by the LMP. The fact that the Forest Service refers to them as "unauthorized", "illegal", or "user created" shows a bias. At the beginning of the RDP, the routes were all referred to as "unclassified" but the term was changed later to "unauthorized". This makes it appear that the Forest Service had already made a judgment on the status, value, and purpose of all routes. In the DEIS, and with verbal remarks such as "morons on motorcycles tearing up the woods", the Forest Service shows evidence they have already drawn conclusions that are pre-decisional and therefore illegal. In this document we will refer to these routes as "unclassified", which is a more accurate and nonjudgmental term.

Contractors were hired by the Forest Service to inventory routes. The public was asked to submit the routes they

wanted to be designated for their use. This was a considerable investment in time and fuel for the public to map and submit routes to the Forest Service. A total of 1109 miles were inventoried, but the mileage ultimately proposed for designation in the current alternatives range from 0 miles to 364 miles (only 0% to 33% of the inventories routes) with a potential loss of 1109 miles. During the time of data collection, the public was told repeatedly that the process had nothing to do with Forest system roads and there would be no change in use on any of those roads. This statement has proven to be false.

Early on in the process, routes were "cut" in an office exercise and never visited in the field. Several assumptions were made at that time, including:
- If a route intersected a county road, it was systematically dropped
- If a route was a dead-end spur less than ¼ mile, it was systematically dropped
- If someone in the office felt the route may have no value to the public, it was systematically dropped
- If a route began or ended at private land, it was systematically dropped, even when the landowner requested the access
- If a route shown on a GIS layer, using an exaggerated wide line for the route location, appeared to be near a resource of concern, it was systematically dropped without knowing exactly how close the route actually came to that resource
- Officials in charge of the RDP told SAC that if the public really wanted one of the routes that had been eliminated in the "first cut", they should ask for the route again. (How many times is the public required to ask for a route?)

The public submitted many routes that were lost in the so-called "first cut" for the above reasons. See Exhibit 1f or a list of these routes. At the point, the Forest Service asked the public to resubmit the routes they wanted again, to see if anybody really wanted the routes. SAC believes it was inappropriate to ask the public to resubmit the same data that they had already worked hard to gather and submit. If the public didn't want the route, they wouldn't have asked for it in the first place. At this point, many members of the public lost faith in the Forest Service and thought it was pointless to continue investing their time to provide input to the process.

- Firewood cutting was not considered during the "first cut".
- Dispersed camping was not considered during the "first cut".
- Game retrieval was not considered during the "first cut".
- Access to and from private land was not considered during the "first cut".
- Future use of routes for timber sales was not considered during the "first cut". If routes are eliminated now, future timber sales may become "uneconomical" due to road reconstruction.
- The fact that the inventoried routes are currently being used demonstrates that there is a user demand for these routes. Consideration of this fact has not been evident in the analysis.

The attached spreadsheet (Exhibit 1) shows the route numbers that we believe were not analyzed. The analysis for all routes that were inventoried needs to be shown in the FEIS, to satisfy NEPA requirements. The FEIS must show why all inventoried routes were dropped from the process.

Response

The Washington Office has determined that a road or trail is either an authorized or unauthorized road or trail. Following that direction, all the routes we are dealing with are considered unauthorized because they are not a system road or trail or they are not authorized by permit or special use. The majority of inventoried routes were constructed in timber sales as temporary roads or skid trails. They were not intended to be used in the future, and were used only for a short time frame. Many routes have also been created by users through repeated use on routes outside of timber sales.

Our intention was to provide a motorized trail system that could be sustained and meet a need for motorized OHV recreation. Many of these inventoried routes were mapped by our contractors with instructions to find any route that had evidence of any motorized use. Many of these are short dead end spurs, require private easements or are not logical trail system additions. Private landowners have not offered to provide easements for OHV use across their property. The majority of inventoried routes were discovered by Forest Service employees or contractors and we needed to know which ones were important to the motorized users.

NEPA does not require the analysis of all inventoried routes and the FEIS is not required to document reasons for not proposing inventoried routes.

Comment 3

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Purpose and Need for Action states that OHV use has resulted in erosion, watershed and habitat degradation, and impacts to cultural sites. How can this determination be made at the time of writing the Purpose and Need? This appears to be pre-decisional.

Response

Unmanaged recreation, including impacts from OHVs, is one of "Four Key Threats Facing the Nation's Forests and

Grasslands." (USDA Forest Service, June 2004)

Comment 4

Action: Goals and Objectives/LRMP Consistency

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The document states many times that the changes to the NFTS will be "limited". But it becomes apparent throughout the rest of the document that major changes are being made to the NFTS. It is inaccurate to call these changes "limited". After analysis the preferred alternative shows that out of 1,109 miles of inventoried routes plus 404 miles of level 3 roads that are being changed, only 51 miles of trail is left open for motorcycle use, 35 miles for ATV's, 165 miles for "All", and 11.3 miles of maintenance level 3 left for green sticker vehicle "mixed use". This is a major change to the existing use of the forest and SAC questions whether the major changes should require a revision of the Plumas LMP.

Response

A plan amendment is not needed to add motorized trails and enforce current direction on mixed use.

Comment 5

Action: Cumulative/Combined Effects

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Numerous references are made in the DEIS to "adding" trails. No new motor trails are being added, because the trails already exist. The cumulative impacts are already there.

Comment 6

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 2 of the DEIS references "internal" discussions. What were these discussions? If not disclosed in the document, these discussions are not appropriate or legal to use in the decision making process. During internal discussions nearly 750 miles of routes were not considered for evaluation and no documentation is presented to support the decision to ignore these routes that were submitted by the public.

Response

These discussions included work within the Interdisciplinary Team and District and Forest Personnel.

Comment 7

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

In the Purpose and Need, page 5, it states that "implementation of Subpart B of the Travel Management Rule would severely reduce acres and miles of motorized recreation opportunities". How was this determined? By placing this statement in the Purpose and Need section, a conclusion has been reached before the analysis has been completed. It is pre-decisional.

Response

36 CFR 212, Subpart B of the final Travel Management Rule requires designation of those roads, trails, and areas that are open to motor vehicle use on National Forests. Only roads and trails that are part of a National Forest transportation System (NFTS) may be designated for motorized use. Without adding unauthorized trails to the system, the Motor Vehicle Use Map would only display existing roads, trails and one area.

Comment 8

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Five alternatives are proposed in the DEIS. Alternative 3 proposes to add zero trails to the NFTS, yet there is no alternative that proposes to add all of the inventoried trails to the NFTS. That should be one of the alternatives considered, especially when Alternatives 2, 4, and 5 are very similar. There are several flaws in the document, which are discussed in detail in the rest of this document. One major flaw that continually surfaces is the plan has no alternative that addresses repair of resource damage on the routes that will not be designated. It is irresponsible for a land manager to ignore the existing resource damage that is cited as the exact reason for designating routes in the first place. By ignoring on the existing damage, and letting it fester, it will only worsen. Without people in vehicles using the routes, the worsening resource damage may even go undetected. The DEIS states in several sections that the specialists are relying on "passive restoration", which means to just walk away without removing the road or trail template, restoring the drainage regime, encouraging revegetation, or using other active restoration methods. A plan needs to be proposed in the FEIS that will commit the Forest Service to evaluate the routes that are not designated in the final decision.

Response

The purpose and need for the current action is to implement the prohibition on cross-country travel required under the travel management regulations, 36 CFR 212.50 and 261.13. However, implementation of this prohibition will result in the loss of much recreational access and opportunity, including motor vehicle access to non-motorized recreational activities. As a result, the Forest Service also identified a need to identify those motor vehicle routes that provide important recreational opportunities and access while minimizing resource impacts. Decommissioning of system roads involves a different and broader set of management considerations than the current project (for example, administrative needs such as fire-fighting access, fuels reduction activities, special use permit administration, etc. would need to be considered). In addition, decommissioning of system roads and trails, or user-created trails, can involve extensive ground-disturbing activities. These activities are more appropriately analyzed and undertaken at scales smaller than the entire national forest. For example, the Forest Service often includes decommissioning proposals in vegetation management or watershed restoration projects.

Comment 9

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

SAC [Sierra Access Coaltion] insists that the Forest Service include an alternative that addresses resource damage restoration. This alternative considers issues that are not addressed in any of the existing alternatives. The Forest Service worked with the Wilderness Society to develop Alternative 3, so we are certain that they would want to be consistent with this action and work with SAC to develop Alternative 6. The issues that should be considered in

Alternative 6 are: Alternative 6 Sierra Access Coalition insists the Forest Service add an Alternative 6 for public consideration. The five existing alternatives in the DEIS don't adequately address all the issues and alternatives that should be considered. Although specific restoration projects are not within the scope of this project, a comprehensive plan to address resource damage that has been caused by past use must be considered. Ignoring the damage and expecting it to return to a natural condition on its own is unreasonable, unscientific, and irresponsible. Alternative 6, at a minimum, should consider the following points which are not evaluated in any of the five existing alternatives:
- Using the 1109 miles of inventoried routes as a baseline, initially remove only those routes with egregious damage. As budgets allow, the remaining routes should be analyzed annually and the Travel Management Plan could be amended.
Develop a comprehensive plan for resource damage mitigation or decommissioning on routes that are not being proposed for designation. This would include the creation of a recreation based travel management team composed of one OHV specialist from each district, possibly funded by green sticker grant funds.
- Until a route is identified for decommissioning it must be left on the NFTS.
- The public needs to be informed annually which routes are being proposed for closure or decommissioning. These actions must no longer be "buried" in large unrelated project proposals, as they have been in the past, but must be proposed categorically under travel management resource restoration projects so the proposals are readily evident to the public.

- This alternative must provide a balanced recreation experience for all OHV vehicle types and skill levels.
- Each major community on the Plumas NF must have an open riding area (approx. 80+ acres) within a 20 minute drive. In the past, this was an "open forest" and each community had motorized recreation opportunities adjacent to them. The other alternatives eliminate that historical use. Include communities such as Quincy, Indian Valley, Chester, LaPorte, Portola, Graeagle, Oroville, Paradise, and others .
- Continuous routes that consist of a combination of county and NFTS roads should be consistent with county road use, to allow uninterrupted loop opportunities for green sticker vehicles.
- The California Highway Patrol must be the agency with authority to interpret the CVC as it pertains to maintenance level 3 roads. The CHP has jurisdiction and the Forest Service needs to accept their interpretation.
- Cross country travel must be allowed for direct access to dispersed campsites with no distance limits.
- Access to firewood trees must be allowed.
- Access for the disabled and elderly must be analyzed.
- A map is attached (see Exhibit 1.1) that displays all routes that need to be included in Alternative 6 and need to be analyzed. It shows routes that were not analyzed in red. We labeled as many routes as we could using the GIS data supplied. However for the routes in red that do not have identifiers on them we are unable to cross reference to the spreadsheets that were supplied. The attached spreadsheet (Exhibit 1) has the route numbers that we believe were not analyzed.

SAC believes Alternative 6 would be the best alternative for addressing cumulative effects on the environment because it would address the mitigation or restoration of resource damage. With a quality, well managed plan, the user groups are going to be more likely to continue volunteering for mitigation and trail maintenance needs.

Response

The purpose and need for the current action is to implement the prohibition on cross-country travel required under the travel management regulations, 36 CFR 212.50 and 261.13. However, implementation of this prohibition will result in the loss of much recreational access and opportunity, including motor vehicle access to non-motorized recreational activities. As a result, the Forest Service also identified a need to identify those motor vehicle routes that provide important recreational opportunities and access while minimizing resource impacts.

Comment 10

Action: Public Involvement

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Travel Management Plan appears to be amending the Forest Plan, although there is no specific reference to this fact in the DEIS. Amendments to the LMP must provide for multiple use and coordination with land management planning of local government. The "coordination" has been limited to presenting reports to the County Boards of Supervisors, with little or no actual coordination effort on the part of the Forest Service. As a result, Plumas County has several issues that have not been discussed with them. These issues must be addressed in the FEIS.

Response

A plan amendment is not needed to add motorized trails and enforce current direction on mixed use.

Comment 11

Action: Disabled and elderly use

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Access for The Disabled and Elderly Contributed by Rex Fisher Reading the DEIS, we [Sierra Access Coaltion] find that many people will be restricted from enjoying the activities and locations that they have used and visited in the past. This is Discrimination by the Plumas National Forest. A service that has been provided for the Disabled and Elderly in the past is now being taken away. The Forest is discriminating against people with Disabilities, against those who are Elderly, and whose health does not permit them to walk or hike up the trails, cross country. The alternatives being proposed in the plan will eliminate many of the trails and roads that the Disabled and Elderly have been using for access to enjoy in the Forest. This Discrimination will also affect those who must accompany them, to provide for their needs and safety.

The only reference that can be found in the DEIS that refers to the Disabled is the standard text that is printed on the inside of the front cover of the document. This Discrimination is based upon Section 504 of the Rehabilitation Act of 2003. "Under the Rehabilitation Act of 2003, no Agency in the Executive Branch of the Federal Government can take actions that restrict the use of facilities or systems under their control." In this section of the Rehabilitation Act, the following text is found: "Section 504 states that "no qualified individual with a disability in

the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under any program or activity that either receives Federal financial assistance or is conducted by any Executive agency or the United States Postal Service." The Department of Agriculture and the U.S. Forest Service are a part of the Executive Branch of the Federal Government and are obligated to follow the language in Section 504 of the Rehabilitation Act.

Further in the language of the Act, it states that each Federal agency has its own set of Section 504 regulations that apply to its own programs. Each agency is responsible for enforcing its own regulations. In the portion relating to the Department of Agriculture the following information can be found: "Purpose: This regulation establishes policy for ensuring positive and continuing notification of USDA equal opportunity policy to the public". The USDA Policy states: "It is the policy of the Department of Agriculture: That no person shall be discriminated against on the basis of race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, or marital or family status in employment or in any program or activity conducted or funded by the Department." The Law is formed under the following authority: Titles VI and VII of the Civil Rights Act of 1964, as Amended (42 U.S.C. 2000d, 2000e-16), b 28 CFR 42.401 et seq., Department of Justice Guidelines for Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs under 7 CFR Part 15, USDA Nondiscrimination Regulations, and Section 501, 504, and 505 of the Rehabilitation Act of 1973 (29 U.S.C. 701, 794).

To bring the Plumas National Forest Public Motorized Travel Management Plan into compliance with Section 504 of the Rehabilitation Act of 2003, increased emphasis and flexibility needs to be inserted into each of the Plan Alternatives. This will allow access for the Disabled and Elderly who use quads and single track motorcycles. They will then be able to access those areas that the healthy can enjoy by using existing roads and trails, where resource damage would not occur. There are many routes on the Forest that provide access to areas where the Disabled and Elderly will no longer be able to visit after the plan is adopted. The alternatives, and the plan as a whole, is required to provide access to all of its visitors and to eliminate the discrimination that this plan and its alternatives fail to consider.

Within the plan's alternatives there are many references to special needs and actions that need to be taken to protect the vegetation, the soil, the water, the wildlife, and other facets of the environment. In some cases, Special Interest Areas are being proposed to protect vegetation, scenic areas, and special unique features of the Forest. These areas can be utilized by those that are fit and healthy to hike into areas such as streams, hillsides, ridge tops, meadows, botanical areas and geologic features. But again, there is no language or references in this plan which speaks to providing motorized access into those areas for persons with special needs.

The standard statement is usually written in Forest documents to inform the reader that it is all right to use a wheelchair in an area where motorized vehicle use is prohibited. This is a ridiculous statement. It is included in the text of the Final Rule document that provides direction on how to write Forest Plans. I was pleased to see that it was not included in the Plumas DEIS, but neither is there any language speaking to any provision of facilities for access by the Disabled or the Elderly to these remote areas of the Forest.

We are asking that each specialist who has provided input into this plan be given time to review their respective areas on the Forest, their original plan input, and then take time to consider how their input will affect the Disabled and Elderly. They must then submit a revised report to the plan on how they will provide access for the Disabled and Elderly. When this information has been put together into the plan, a review of the revision needs to be completed to insure that access to this segment of the population is provided.

The Disabled and Elderly make up a majority of the Plumas County population and that of California, which is reflected in the last Census. Many are forest users, and as part of their heritage, they must be provided access to the areas they have used in the past.

(See Exhibit 2)

Response

Although the various alternatives considered in the FEIS include restrictions on where public wheeled motor vehicle use will be allowed, all of the alternatives maintain a significant number of miles of roads and trails open to motor vehicle use. The Rehabilitation Act of 1973, which was amended by the Americans with Disabilities Act of 1990, set the direction that no person with a disability can be denied participation in a Federal program that is available to all other people solely because of their disability. This Travel Management project is designed to provide reasonable access for public wheeled motor vehicles and the decision to be made would apply to all Forest visitors. As stated in the preamble to the national Travel Management regulations, there is no requirement to allow people with disabilities to use motor vehicles on road or trails otherwise closed to motor vehicles since such an exemption could fundamentally change the travel management program (Fed Reg V.70, No. 216, p 68285).

Comment 12

Action: Adequacy of Studies (Best Available Science)

Resource(s): Wetlands

Disposition: Resolved: Other (SEE RESPONSE)

Aquatic, Terrestrial, and Riparian Species
This analysis has many flaws. The DEIS states that site visits were not made to all routes. All conflicts with aquatic species need to be site specific and mitigation developed before each route is considered to be closed.

There needs to be site specific data, by route, to support impacts to aquatic species. If this documentation cannot be produced, the routes should be designated.

Response

The Forest surveyed 410 miles of unauthorized routes by hydrological surveys, in addition amphibian surveys are documented in Tables, all available data was used. All routes of the preferred alternative (alt. 5) with the potential to affect aquatic species were identified as either surveyed or not and are listed in Appendix 1 & 2 of the Biological Assessment for consultation with USFWS. This document has been placed on the OHV public web site. In additon, there are Appendices in the Biological Assessment and Evaluation that identifys all surveyed and unsurveyed routes for the preferred alternative. The funding was not available to complete new amphibian surveys across the forest to protocol. Assumptions have to be made, and any determination to not include a route in a specific alternative was made route by route with all available information including working very closely with the hydrologists who surveyed the 410 miles and had site specific information, and made the first call of effect to aquatic habitat including sedimentation. Then this information was used to determine if either the route could be mitigated (high), or had to be re-located (extreme) it was identified in Table 1 of the FEIS and in Appendix A.

Comment 13

Action: Adequacy of Studies (Best Available Science)

Resource(s): T&E, Special Status (plants and animals)

Disposition: Resolved: Other (SEE RESPONSE)

Page 107 – Introduction
The paper written by Trombulek and Frissell 2000 is referenced 16 times in this document. So it is assumed to be an important source of information by specialists. Yet, it does not address any of the TES species on the Plumas NF (red-legged frog, mountain yellow-legged frog, foothill yellow-legged frog, hardhead minnow, and northwestern pond turtle). Generally this study says that if Best Management Practices are in place to control sediment, impacts from roads are manageable. It does not recommend eliminating roads, however it does say that elephants won't cross roads in Gabon, black bears won't cross highways in North Carolina, caribou are dependent on roads in Alaska for migration, and many other irrelevant references. We [Sierra Access Coaltion] fail to see the applicability of this paper on aquatics, although it is cited numerous times.

Response

The paper is a literature review of road effects to both aquatic and terrestrial ecosystems. Conclusions of the paper include careful tailoring of road management, design, and restoration, and maintaining roadless areas. Because of the paper's scope, it is a general overview of road effects and was correctly cited in the FEIS.

Comment 14

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Page 109
SAC [Sierra Access Coaltion] supports the need to protect the California red-legged frog. However, the studies need to be complete so it's known which areas they occupy. The FS has failed the users by not completing the study during the timeframe of the Route Designation project (the past 6 years) and as a result there is no data to support their conclusions. This study needs to be completed and included in the FEIS. It is essential that locations of critical aquatic refuges for the CRLF are made part of the FEIS so it can be determined by the public whether proposed routes fall within the CARs. On page 112, the DEIS states that CRLF occupancy is assumed on all unsurveyed habitat. Surveys need to be completed so occupancy is confirmed.

Response

According to USFWS protocol, CRLF surveys must be done every 2 years to be valid. Generally, occupancy can be confirmed, but absence cannot be confirmed.

The Forest did complete a portion of the USFWS survey protocol by completing California red-legged frog site assessments throughout the Jack's CAR in the French Creek Watershed where a known breeding population of CRLF are known to exist. The field surveys (2nd part of the survey protocol) are very expensive, requiring six visits (4 nocturnal, 2 day time) to complete the CRLF surveys to protocol. The Forest did not have the funding to complete these surveys across the west side of the forest at 4,500' and below. Therefore where surveys were not completed, occupancy was presumed in all unsurveyed potential habitat for the CRLF. This direction was used in implementing the October 2006 Programmatic Agreement with the Fish & Wildlife Service and the 6 project design criteria that

was applied in analyzing the action alternatives.

In addition to the site assessments, a three year telemetry study was completed (T. Tatarian, 2007) on the known population of red-legged frogs at Hughes Pond. This study was already ongoing during the time in which the Travel Management Project was initiated and forest biologists were brought onto the interdisciplinary team.

Three maps (available in the project record and OHV web site) have been developed, one for each district that include alt. 2 & 5 routes, CAR's, and some of the Aquatic analysis parameters identified in chapter 3 of the FEIS and in the Biological Assessment/Evaluation.

Comment 15

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Page 110
3.6.3.2 Assumptions Specific to the Aquatic Biota Analysis "All vehicle types result in the same amount of disturbance". This statement assumes that a single track motorcycle with 2 wheels is the same impact as a 16-wheel log truck. (0.25 sq ft of surface area impact for a motorcycle vs 24 sq ft for a log truck). Obviously this assumption is flawed. This same assumption is made on page 166 for wildlife. Gaines et al is the study that is quoted throughout the DEIS. However, this study makes it clear that there is a definite difference in impacts from various types of routes. This is a contradiction.

Response

The same kind of analysis was applied to each route. The Aquatic biota analysis did not equate the use of a motorcycle with the use of a 16-wheeled log truck. With the exception of mixed use on 4.1 miles of system road, the forest does not expect a log truck to use any of motorized trails considered under the action alternatives. For the commentor to suggest this is completely erroneous.

To determine acres of potentially affected habitat in the analysis for the CRLF (as requested by USFWS) the average width of impact for all routes was six feet. This value was applied to miles of routes within Riparian buffers (300' and 500') to determine potential acerage of affected habitat. All routes that have the potential to affect aquatic resources and habitat will be mitigated, and these mitigations will be determined on a site specific basis. For all other species analyzed miles of routes were used to generalized affects.

Comment 16

Action: Mapping, GIS

Resource(s): Wetlands

Disposition: Resolved: Other (SEE RESPONSE)

Page 110
3.6.3.3 Data Sources This page references GIS layers. SAC questions the accuracy of the GIS layers. Other sections of the DEIS admit to having inaccurate GIS layers. Are the aquatic layers also inaccurate? Documentation needs to support whether this data is valid.

Response

The Plumas NF Aquatic GIS layers provide the best available information for use in this level of analysis, and are considered accurate. PNF GIS layers contain site specific records of species occurrences across the Plumas National Forest. These records are a result of site specific surveys/visits conducted by the Forest Service or its contractors or cooperators. PNF GIS Stream layers used in the analysis are also considered the best available information and are incororated into our Corporate GIS files for use in project analyses at all levels (forest-wide, project level, forest planning, etc).

Comment 17

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Page 111
3.6.3.4.2 Route and Trail Density "Thresholds for density have not been established, however, density provides a relative way to compare the effects of the alternatives." There is no baseline or science to support this assumption.

Response

Comment noted, trail density was used to provide relative effects of the alternatives.

Comment 18

Action: Cumulative/Combined Effects

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

Page 114
Cumulative Effects This page references the alternatives of "no-action" and the "Cross-country ban only". What is the "cross-country ban only"? This is not referenced anywhere else in the document.

Response

This sentence has been revised in the FEIS.

Comment 19

Action: Update, Change, or Add Data to Existing Studies

Resource(s): T&E, Special Status (plants and animals)

Disposition: Resolved: Other (SEE RESPONSE)

Page 115 3.6.4 Affected Environment
"The PNF provides habitat for three species of TES amphibians and one Sensitive reptile" and Table 1 is referenced. Table 1 on page 16 is a list of roads and has no mention of TES. However on pages 116-117, Table 24 lists a total of 6 TES. Which is correct?

Response

Sentence revised on pg. 115 (3.6.4 Affected Environment): "There is currently, one aquatic wildlife species listed as Threatened under the ESA (CRLF), and four species listed as Forest Service Sensitive ([MYLF, FYLF, NWPT, and the Hardhead minnow] Table XXX). There are no known Northern leopard frogs (Forest Sensitive Species) on the Plumas National Forest. "

Comment 20

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wetlands

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 116 references Riparian Conservation Areas, but we believe these are only SAT guidelines for vegetation projects.

Response

Riparian Conservation Areas (RCA's) are addressed in the Sierra Nevada Framework, and the SAT guidelines for HFQLGFRA vegetation projects address Riparian Habitat Conservation Areas (RHCA's). It is correct to follow the Framework Aquatic Conservation Strategy for OHV route designation.

Comment 21

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 117 has a footnote #5 in the text (1 aquatic vertebrate group) but there is no footnote at the bottom of the page. What is the missing data?

Response

The Correction in the FEIS has been made. The footnote is misnumbered and should be #3. On page 117 of the DEIS the footnote #3 says "Benthic macro-invertebrates are analyzed in the Management Indicator Species section of the FEIS.

Comment 22

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 118 3.6.5.2 Fisheries
- "Irregularly or unpredictable streamflows has the potential to impact fish". How do OHVs cause irregular or unpredictable streamflows?
- "High streamflow events" cause increased mortality to amphibian and fish populations. How do OHVs cause high streamflow events? This is a natural phenomena.
- It also states "impacts to fisheries include....migration barriers, introduction of exotic fish and invasive bull frogs". These are not OHV impacts.
- Making these irrelevant statements lead the reader to believe the author has a bias against OHVs.

Response

All roads and trail surfaces intercept and concentrate precipitation and snowmelt to some degree. Runoff that would have been well dispersed and would have flowed over well-vegetated hillsides is instead concentrated in roadside ditches or surface drains (rolling dips or waterbars), flowing much more quickly. This increases "high streamflow events" and increase the potential for unpredictable streamflow events in a watershed. The result is a modification of the natural watershed drainage regime that is created by nearly every road and trail on the landscape. This modification is frequently manifested as a network of unnatural, small drainage (i.e. stream) channels created by a road or trail. Reference the Water Resources section in the Soil and Water Resources section of chapt. 3.

Trails and roads crossing over streams and water bodies have the potential to fragment the aquatic systems and could directly affect movement of aquatic species, depending on trail use and intensity. There is the potential for humans to introduce exotic fish and bull frogs into water bodies due to access by OHV trails.

These statements are not irrelevant; studies have shown effects to aquatic species and their habitats and analysis is completed to determine effects of the action alternatives.

Comment 23

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wetlands

Disposition: Resolved: Other (SEE RESPONSE)

Page 119 3.6.5.4 Herpetofauna
"No studies have identified the impacts of wheeled vehicle use of roads on FYLF or NWPT". However the author cites several risk factors including loss of habitat, aquatic and riparian environments used for reproduction, cover, foraging, aestivation, egg survival, riparian vegetation, emergent vegetation, nutrient loading, channel morphology, and others. On page 120 it states, "The knowledge of the impact of increased sediment load on amphibians is limited". So the author draws several conclusions that must be based on personal opinion rather than scientific fact.

Response

Studies on the effects of road and trail associated factors on other amphibians (Fahrig et al. 1995, Mazerolle, 2003, and Vos and Chardon 1998, Trombulak and Frissell 2000, Hine et al. 1981) is correlated to having similar affects on

species with similar life histories and habitat requirements and was correctly cited in the FEIS.

Comment 24

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 120 The end of the first paragraph says "(Mark, T personal communication)". What does that mean?

Response

Incorrect citation, corrected in the FEIS.

Comment 25

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Page 121
The first paragraph lists heavy metals, salt, road de-icers, and lead in fuel as contaminants that are contributing to the environment by OHVs. There is no known past or present use of salt or de-icers on Plumas NF roads. Lead hasn't been present in fuel for at least 2 decades. These alleged contaminants are non-existent on Plumas NF roads.

Response

The narrative in last paragraph on pg.120 and 1st paragraph on pg.121 of DEIS is a general discussion and disclosure of effects from chemicals to herpetofauna, from various studies as noted in the references. A discussion of lead is in reference to the "historic use of lead as a fuel additive that may have sublethal effects to growth and behavior of the northern leopard frog larvae (Chen et al. 2006). The northern leopard frog is in the same family (Ranidae) as the CRLF, MYLF, and FYLF. No data exists that specifically addresses the effects of road associated chemicals on CRLF, MYLF, FYLF or WPT, therefore the Chen et al 2006 study was used as a reference for species under the Ranidae family.

Comment 26

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Not within agency's jurisdiction (SEE RESPONSE)

Page 121 3.6.6.1 California Red-Legged Frog
We [Sierra Access Coalition] have been told by the Forest Fisheries Biologist that field surveys have not been done in all cases, and still needed to be done. However on page 113 (a-d) each definition says that field surveys were made in all cases in order to use a rating of Low, Moderate, High, or Extreme. So these ratings should not be used unless a field visit is actually performed, and ratings erroneously used should be deleted from the FEIS. At the bottom of the page, it states "a major breeding population of CRLF was located in the French Creek Watershed'. To be accurate, this should state that this was the only population of CRLFs found on the Plumas.

Response

The Forest surveyed 410 miles of unauthorized routes by hydrological surveys (these field surveys were completed on all routes in action alternatives (alts 2,4 & 5). In addition, past amphibian surveys completed were used and areas not surveyed to protocol were identified. All routes of the preferred alternative (alt. 5) with the potential to affect aquatic species were identified as either surveyed or not and are listed in Appendix 1 & 2 of the Biological Assessment. This document has been placed on the OHV public web site. In addition, there are Appendices in the Biological Assessment/Evaluation that identifies all surveyed and unsurveyed routes for the preferred alternative. Fellers & Freel protocol surveys were completed, until the funding ran out, in potential amphibian habitat adjacent to routes, where HFQLG contract surveys were not completed (Appendices 1 &2 in BA/BE). All remaining unsurveyed habitat was considered occupied. Any determination to not include a route in a specific alternative was made route

by route with all available information including historic species information and working very closely with the hydrologists who surveyed the 410 miles, had site specific route information and made the first call of effect to aquatic habitat including sedimentation. This information was then used to determine if either the route could be mitigated (high) or had to be re-located (extreme). The final determination was identified in Table 1 of the FEIS and in Appendix A.

According to USFWS protocol, CRLF surveys must be done every 2 years to be valid. Generally, occupancy can be confirmed, but absence cannot be confirmed.

The Forest completed the first portion of the USFWS California red-legged frog survey protocol by conducting site assessments throughout the Jack's CAR in the French Creek Watershed where a known breeding population of CRLF was known to exist. The Forest did not have the funding to complete the field surveys (2nd portion of the protocol) across the forest at 4,500' and below. CRLF surveys are very expensive, requiring six visits (4 nocturnal, 2 day time) to complete the CRLF survey to protocol. Therefore, the remaining unsurveyed habitat was assumed to be occupied. This assumption was carried forward in the analysis and applied to implementing the October 2006 Programmatic Agreement with the FWS and the 6 project design criteria.

There are two known breeding populations of CRLF on the Forest, one is outside any proposed OHV trails for this analysis.

Comment 27

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wetlands

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 122 3.6.6.2.1
The mileage in the 500' buffer (ZOIs) for each alternative does not match the mileage shown for CRLF in Table 30, which should be more inclusive because it includes all TES. Until studies are done, table 30 should be the data used for the road and trail analysis. This section should be analyzed using best management practices for mitigation and then reevaluated.

Response

The milage in Table 30 identifies the miles of routes and trails by alternatives that are within 500 feet of known occurences of CRLF. The milage found within ZOI's for each alternative is the miles of trails or routes that fall within the 500' zone of influence (ZOI). This analysis is of the effects of proposed routes and trails to aquatic habitats within the elevational range of the species. Again, all unsurveyed habitat is presumed occupied.

Comment 28

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wetlands

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 123 3.6.6.2.2
The "potential" population of CRLFs needs to be analyzed by conducting field visits and studies according US Fish and Wildlife and Fellers protocol before any unclassified routes are closed. The statement that there is a "high potential of an OHV crushing a CRLF" is not based in science. There may be an "increased" potential, but it is certainly not a "high" potential unless traffic counts can be produced to support that statement. The figures in Tables 26, 27, 32, and 33 are not accurate.

Response

Again, the Forest has completed USFWS California red-legged frog site assessments throughout the Jack's CAR in the French Creek Watershed where a known breeding population of CRLF are known to exist. A three year telemetry study was completed (T. Tatarian, 2007). The Forest Service has agreed (with the USFWS) to survey to USFWS protocol; all habitat identified as potentially suitable within the Jack's CAR that could be affected by a proposed OHV trail within the selected alternative. In addition the Forest has agreed to survey to USFWS protocol; all potential habitat (again that could be affected by a proposed OHV trail) that has not been previously surveyed through the HFQLGFRA amphibian contracted surveys. These surveys are very expensive, requiring six visits (4 nocturnal, 2 day time) to complete the CRLF survey to protocol. The Forest did not have the funding to complete these surveys across the forest at 4,500' and below and are currently in formal consultation with USFWS because of this, and not meeting the 6 criteria developed in a MOU (Oct, 2006) at the Regional level (as identified in Chapt. 3 of DEIS pg. 109).

In consultation with USFWS; minimization measures have been developed to reduce the potential effects to CRLF and their habitat. Proposed minimization measures include stream crossings (small bridges, box culvert) seasonal closures, complete closures, posting signs, and the implementation of Best Management Practices (BMPs). The USFWS will provide a Biological Opinion with mandatory terms and conditions that will be incorporated into the selected alternative.

Occupancy is presumed in all unsurveyed potential habitat for the CRLF.

Again, all figures in the tables have been changed.

Comment 29

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Page 124
The DEIS states that the Forest is in "early consultation" with USFWS. Until this consultation and studies are complete, this data should not be inferred in the FEIS.

Response

The commentor is correct in stating the Forest was in early consultation with the USFWS. However since development of the DEIS, the Plumas NF has proceeded toward completion of the FEIS under the October 2006 Programmatic Agreement with the Fish & Wildlife Service which provided 6 project design criteria that needed to be met in order to reach a "no affect' or a "may affect, not likely to adversley affect" determination for the California Red-legged Frog. If either determination was met, the Forest was not required to consult with the FWS any further and Section 7 Consultation was considered completed. Data used analyzed in the analysis for the FEIS was consistent with the data required to anaylze the alternatives under the 6 project design criteria.

Comment 30

Action: Mapping, GIS

Resource(s): Wetlands

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Pages 125, 133
Tables 29 and 35 need to be changed to reflect the inaccuracies that are showing up in the GIS data layers. The data is flawed and so is the math.

Response

All figures have been revised in the tables due to new GIS runs on the revised alternatives.

Comment 31

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 126
Several references are made regarding damage to routes recovering naturally. There are many other references in the DEIS that say this type of passive recovery is not enough, and further treatment will need to be made on most routes that are abandoned.

Response

The statements on pg. 126 says the following "...within the long term (20 years) these closed unauthorized routes would have time to recover naturally and again recovery could be enhanced by manual treatment". Enhancement is an opportunity at some sites, this statement does not discuss that further treatment of abandoned routes is

needed.

Comment 32

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wetlands

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 128 Table 31
This table references the Backcountry Discovery Trail as an impact to riverine and lacustrine habitat. The Backcountry Discovery Trail is comprised of only NFTS roads, which have already been assessed for their impacts. The reference to the Backcountry Discovery Trail should be eliminated from this table and from the cumulative effects analysis.

Response

It is appropriate for the specialist to analyze the effects of this trail from the stand point of cumulative effects. Cumulative impacts (effects) are defined as the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 220.3).

The specialist reports analyze the direct, indirect and cumulative effects consistent with these regulations.

Comment 33

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 129 3.6.6.4
This section states that Alternative 4 has a moderate to low potential for direct, indirect and cumulative effects to CRLFs. But in 3.6.6.5 Determinations – Alternative 4 is not mentioned.

Response

The determination for alternative 4 is discussed on page 130 of the DEIS. Alternative 4 meets all the criteria to lead to a “May affect, not likely to adversely affect” determination for the CRLF. This determination was made using the 6 project design criteria listed for the California Red-legged Frog under the October 2006 Programmatic Agreement between the USFWS and Region 5 of the US Forest Service.

Comment 34

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 133
Table 34 – Lone Rock and Boulder/Lowe are not CARS for FYLF and NWPT. Which Bucks Creek is being referenced (Bucks Lake or Feather River?) Which Rock Creek is being referenced (Meadow Valley or Feather River Canyon?)

Response

The commentor is correct, the Lone Rock and Boulder/Lowe CAR's do not have FYLF or NWPT and reference to these have been deleted in Table 34. Buck's creek is in the Buck's CAR (e.g. Bucks Lake as referenced by the commentor). Could not find "Buck's Creek" in narrative sections of the DEIS?

Rock Creek is within Meadow Valley and flows into Spanish Creek. This is the Rock Creek referenced in the DEIS.

Comment 35

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 134 3.6.7.3.1
This section, written by a wildlife biologist, draws conclusions about compacted, degraded soil. The soil scientist on page 87 wrote severe soil compaction "has little effect on soil productivity at most sites". The speculation by the biologist should be removed from the FEIS. On page 134 the wildlife biologist is also making statements about how to decommission trails, when this should be an engineering function rather than biology. It is unclear in Table 36 whether the figures are miles of proposed trails or the number of known/confirmed occurrences. Similarly, in Tables 38 and 39 on page 143 it is unclear whether it refers to acres or miles.

Response

The soils and water report is discussing on pg. 87 the prohibition of cross-country travel and the potential for the undesignated routes with compacted soil to recover vegetatively..."with regard to soil compaction, the recent LTSP study indicates that severe compaction of forest soils does not preclude the re-establishment of vegetation (Powers et al. 2005)". The Aquatic species discussion in section 3.6.7.3 is discussing that with the selection of alternative 1 there would be "no ability for the compacted, degraded soil and vegetative conditions to recover". This is not speculation, findings are from studies by Power's et. al. is that these trails can recover as discussed above.

In table 36; the figures under each of the alternatives are the "miles" of proposed trails and unauthorized routes within 500 feet of the known FYLF and NWPT occurances. In tables 38 and 39, the title of the table says "Miles" of proposed trails and unauthorized routes.

Comment 36

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 140 3.6.7.5.1 Foothill yellow-legged frog
This section states "Alternative 1 may affect individuals and is likely to result in a trend toward listing or loss of viability" for FYLF. Since all routes in Alternative 1 did not have a field visit, this statement is opinion rather than fact.

Response

All unsurveyed habitat is considered occupied therefor this determination is the best professional judgement of affects by alternative 1.

Comment 37

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 156 3.6.11.1.4 Mountain yellow-legged frog
This section states that Alternative 5 is likely to adversely affect MYLF, but table 48 says it is not likely to adversely affect. Which is true? This data is flawed.

Response

The determination on pg. 156 now says: Alternative 1 may affect individuals and is likely to result in a trend toward Federal Listing of the Mountain yellow-legged frog and its habitat. Alternatives 2, 4 and 5 may affect individuals, but is not likely to result in a trend toward Federal listing or loss of viability for the Mountain yellow-legged frog. Alternative 3 will not affect the MYLF. In table 48 the determination for the MYLF is made as a Forest Service sensitive species. The determination in table 48 for Alternative 5 reads: MAI = May Affect, but is Not likely to

adversely affect Individuals, and is not likely to result in a trend toward Federal listing or loss of viability.

Comment 38

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: 2004 SNFPA Standard & Guideline #82

Page 158 3.7.2
This section states that proposals for new road construction would be analyzed in this process for California spotted owl, Northern goshawk, Pacific fisher and American marten. But we [Sierra Access Coalition] can't find any proposals in the alternatives for new road construction. The FEIS should present all information for proposed road construction.

Response

The commentor refers to language represented in Section 3.7.2 in the FEIS that refers to a standard & guideline from the 2004 SNFPA. The FEIS does not propose any new road construction. Refer to Standard & Guideline #82, which not only refers to new roads, but also to off highway vehicle routes, and their potential for routes to disturb nest sites. This standard & guideline was used in the FEIS as Forest Plan direction that framed our analysis for Owls and Goshawks.

Comment 39

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 159 3.7.3.1
This section states that "road and trail corridors may act as habitat sinks for wildlife", but just below this statement there is a paragraph about the displacement and avoidance of wildlife caused by roads. These two statements, on the same page, contradict each other. Two of the species that are referenced are grizzly bear and elk, which have no known populations on the Plumas NF. "Bald eagles nests were preferentially selected away from roads". This does not appear to be true on the Plumas, evidenced by a bald eagle nest at Antelope Lake immediately adjacent to the paved road that has known to have been in the same tree and producing fledglings since at least 1968. So what is true in Oregon or Illinois is not true on the Plumas.

Response

Statements referenced above by the commentors fall under two seperate sections of the FEIS; Section 3.7.3.1 Mortality from Collision with Vehicles and Section 3.7.3.2 Modification of Animal Behavior. The Statements made refer general effects of roads and trails from reviewed scientific literature. The references were to show that in other areas where studies have been conducted, some animals (Black and Grizzly bears and Elk) adjust home ranges to avoid areas of high road densities and some animals (black and grizzly bears and elk) appear to have different seasonal avoidance responses to roads. This literature from other locations is noted because specific studies have not been conducted on road avoidance on the Plumas NF, but the animal responses (general avoidance of moderate and high levels of human activity along roads) are expected to be similar of other species.

The bald eagles at Antelope Lake are known to occupy sites (roosts, perches) adjacent to paved roads and this has been cited in Affected Environment section (3.7.18) for Bald Eagles in the FEIS. The FEIS acknowledges that the response of bald eagles to human activities (i.e. road use) is variable and that individual bald eagles show different thresholds of tolerance for disturbance, such as the eagles at Antelope Lake. In reference to production of fledglings, the Antelope Lake Bald Eagle Territories (three) have been variable in producing young. Young have not been fledged from each territory every year (see project level Biological Evaluation for breeding success at territories).

Comment 40

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 160 3.7.3.3
"Increases in soil density on decommissioned roads can persist for decades". It is not prudent for the Forest Service to ignore resource damage on roads that are not designated.

Response

This statement needs to be looked at in context with the preceeding sentence. The statement does not infer that the Forest Service is ingnoring resource damage, it simply states that soil density levels can remain at high levels after a road is decommissioned. This is simply of consequence of long term use of a road and compaction of the road surface over time.

Comment 41

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 160 3.7.3.3.1
This data is irrelevant and should be removed from analysis. Road crossings on the routes under consideration for designation are existing, so if there is a fish barrier it will not be mitigated by denying designation. Although it is an issue that should be addressed by the Forest Service, mitigation of fish barriers is outside the scope of this project. If a road is impacting the resources, the problem should not be ignored, but a future project should be proposed to mitigate the problem.

Response

Section 3.7.3.3.1 has been removed from the terrestrial wildlife section of the FEIS.

Comment 42

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 161 3.7.3.3.1
"Motor vehicles crossing creeks pose some risk of gas and oil leaks into the creek. Oil and gas have been shown to have negative effects to the growth and survival in several frog species." But hydrologists consider low water crossings (rocked fords) to be the preferred creek crossing structure, especially in headwaters. Which of these opposing views is preferred?

Response

Section 3.7.3.3.1 has been removed from the terrestrial wildlife section of the FEIS.

Comment 43

Action: Adequacy of Studies (Best Available Science)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Page 169 3.7.5.3
The reasoning on this issue (poaching) will not be resolved just by closing roads. There are laws against poaching currently on the books. No additional provisions need to be added in the Travel Management Plan. The reference on this page and other pages, such as page 177, refer to vehicles running over animals. There is no documentation to support this, except on high speed highways.

Response

The terrestrial wildlife analysis on page 169 is not promoting a resolution for poaching by closing roads. The California Department of Fish & Game is the primary agency responsible for enforcing wildlife laws, and receives cooperation from Forest Service Law Enforcement as needed or requested. The statement made on page 169 simply states that the act of poaching is facilitated by roads and trails which is taken from scientific literature (Gaines, et al. 2003). Nowhere in the FEIS does the Forest state that closing roads will resolve poaching.

The comment regarding page 177 is similar in that the terrestrial wildlife analysis is simply displaying a summary of potential impacts from roads and trails as taken from scientific literature (Gaines, et al. 2003). The FEIS does acknowledge less risk of mortality on unpaved forest routes (see section 3.7.3.1), and this lower risk was used when considering effects in the FEIS.

Comment 44

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: 2004 SNFPA and FSM 2670

Page 170 3.7.6 Wolverine
The DNA evidence of the wolverine found in the Truckee area recently shows that this is a Rocky Mountain species that has never been detected in this area previously. There are 6 pages on inapplicable analysis in the DEIS. Energy spent on this analysis could have been put to better use. Table 55 shows that there's a 14% difference in the effects on a non-existent population of wolverines between Alternative 1 and Alternative 3. Please clarify this statement in regards to the wolverine.

Response

The wolverine analysis in the terrestrial wildlife analysis section of the DEIS is required under the PNF Forest Plan as amended by the 2004 SNFPA and Forest Service Manual 2670 - Sensitive Species. As a Regional Forester Sensitive Species, the wolverine, regardless of physical presence, needs to be addressed if suitable habitat is found in the project analysis area. Therefore, the terrestrial wildlife analysis section addresses effects to wolverine habitat by evaluating habitat fragmentation at the forest scale as a result of route densities (See Table 55). The wolverine found in the Truckee area is related to wolverines found in the Rocky Mountains based on genetic analysis. All wolverines however are the same species (e.g. there is no Rocky Mountain species of Wolverine).

Comment 45

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 170 through 208
References to Tables 8 through 28 are wrong. The data is flawed.

Response

This has been corrected in the FEIS.

Comment 46

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Other (SEE RESPONSE)

Page 180 Table 57
It is unclear what this table refers to.

Response

Table 57 refers to the acres of Late Successional Forest Habitat (CWHR 4M, 4d, 5M, 5D and 6) that lie within the 200 meter buffer of existing unauthorized routes and proposed trails.

Comment 47

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 181
The figures in Table 57 don't appear to be accurate.

Response

This has been addressed in the FEIS.

Comment 48

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Page 184 3.7.11
Delaney and Grubb (2003) found that spotted owl responses to motorcycle disturbance did not appear to affect reproductive success. Other studies, involving logging trucks, which may have shown stress for spotted owls are cited. But the Forest can produce no scientific evidence that OHVs have a detrimental effect on spotted owls. On page 185, it states "since impacts to spotted owls are not well understood, impacts from all motorized routes, regardless of route type and intensity of use, are treated the same". An example of the lack of logic with this statement is at a known PAC next to the Spring Garden Tunnel. An OHV route to the tunnel has been denied, but trains run through the PAC on a regular basis. It is implausible that the disturbance and impact from a train is the same as from a motorcycle. Please clarify how the impact can be considered comparable. If there is documentation that there has been successful owl reproduction in this PAC, they must be adapted to the environment. SAC [Sierra Access Coalition] would also like to know if the routes within the PACs that were destroyed during recent fires (Moonlight, Antelope, Cold, Canyon Complex, Butte, etc), and the subsequent cumulative effects, remain in this analysis.

Response

Several studies exist in which the effects of noise to spotted owls where evaluated, including the 2003 study by Delaney and Grubb. Others include Delaney, et al 1999, where the effects of helicopter and chainsaw noise on Mexican spotted owls where analyzed or the Delaney and Grubb, 2004 study where they evaluated the effects of noise levels generated by road maintenance equipment on Mexican spotted owls. All these studies were evaluated and are the basis for why many forests adopted Standards & Guidelines that maintain either buffer zones or implement Limited Operating Periods (LOPs) for species such as the spotted owl at a distance of 0.25 miles.

To clarify the commenter's statement that trains run through the PAC on a regular basis, our analysis indicates that the train tracks within the Spring Garden PAC (PL011) actually run underground (Spring Garden Tunnel) through the PAC, thereby minimizing noise effects to owls within the PAC. The open (aboveground) train tracks enter the tunnel at approximately 0.75 miles from the PAC's northern boundary and re-emerge at the outer edge of the PACs southern boundary. The route mentioned by the commenter, 11M09 has been re-evaluated and added to Alternative 5 with a limited operating period for Spotted Owls and watershed impacts (closed January 1 to August 15). This was based on input from the public who desired access to the area during deer hunting season, which did not conflict with the owl breeding season. Breeding within PL011 has been sporadic over time. Reproduction in the PAC was documented in 1983 and 1989. Surveys were conducted in 2004, 2007 and 2008. A single spotted owl, age and sex unknown was found in 2004 by the Plumas Lassen Administrative Study, and in 2007 and 08, occupancy was confirmed in each of those years, however reproduction was not. The 2007 and 2008 surveys were conducted as part of the Big Hill HFQLG Project.

The Spotted Owl Analysis does consider the loss of PACs as a result of wildfires from 2000 and to present. Table 64 in Spotted Owl Section in the FEIS displays the current number of PACs on the Plumas NF, which incorporates PACs rendered unsuitable by all wildfires from 2000 to present. All wildfires prior to 2000 and any associated PAC loss were considered as part of the HFQLG Pilot Project analysis that amended the original 1988 Forest Plan.

Comment 49

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 193 3.7.11.8
The data appears to be incorrect. This section discusses Alternative 2 in two different paragraphs but doesn't discuss Alternative 4 at all. The data is flawed.

Response

This has been corrected in the FEIS.

Comment 50

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 196 3.7.12
The figures in Table 69 and in the text are incorrect. The data is flawed.

Response

The number of Goshawks PACs in Table 69 have been corrected in the FEIS.

Comment 51

Action: Adequacy of Studies (Best Available Science)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Citation: Terrestrial Wildlife Section FEIS (Page 197-204)

Page 197 3.7.12
"Grubb et al (1998) reported that vehicle traffic from roads did not elicit any discernable behavioral response from goshawk at distances exceeding 400-meters from nests." Dunk et al (2007) was a study conducted on the Plumas to examine the effects of OHVs on juvenile northern goshawks. Results did not indicate a negative effect on goshawks. This study is not cited in the DEIS. Ignoring this study makes it appear that Plumas specialists have a bias against OHVs.

Response

Comment regarding Grubb et al (1998) is accurate and cited in the FEIS on page 197. Based on Grubb et al (1998), the Plumas NF evaluated effects to nesting Goshawks within a distance of less than or equal to 0.25 miles. The results of our analysis are found on Table 75 (pg 226). In 2003, the Forest Service initiated a study on the effects of OHVs on nesting goshawks in the Plumas NF with Jeff Dunk as the principal investigator. The analysis of that data continues and formal results of that study are currently being prepared but are not expected to be completed prior to the completion of the FEIS and ROD. Preliminary impressions from that study were presented by the study investigators at the Ecological Society of America and Society for Ecological Restoration Joint Conference in 2007 (Dunk et al. 2007). At that time, the preliminary indications were that monitored goshawks did not appear to be negatively affected as the commenter notes. However, details and analysis that would be necessary to fully consider the implications of this study in the FEIS will not be available until the final report is completed, thus this information was not cited in the FEIS. If the final results of this study present significant new scientific information relevant to the Plumas travel management program, it will be considered at that time and adjustments to the travel management program could be considered.

Comment 52

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 198 3.7.13.2.1
The total of goshawks is not correct.

Response

This has been corrected in the FEIS

Comment 53

Action: Consider Additional Information

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Page 199 3.7.13.2.2
"All action alternatives…significantly reduce impacts to breeding goshawks". This is a very significant piece of data.

Response

This statement is correct when put in context and made in reference to Alternative 1. All the action alternatives (2-5) significantly reduce the impacts to breeding goshawks due to two key factors 1) reduction in trail miles, and 2) the prohibition of cross country travel and the future proliferation of additional routes. See Table 75 in the FEIS which discloses the miles of proposed trails and unauthorized routes within a 0.25 mile radius of Goshawk Activity Centers (nest site or nest stand). This table shows that the action alternatives (2-5) have significantly less trail miles that fall witin 0.25 miles of an activity center than Alternative 1, and therefore pose less of a risk to breeding Goshawks.

Comment 54

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Citation: See FEIS page 203, Section 3.7.13.5

Page 203 3.7.13.5
This section talks about spotted owl habitat, but this section is about goshawks. This data is flawed.

Response

Correction has been made in the FEIS.

Comment 55

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 212 3.7.19
The number of bald eagle territories on this page and in Table 80 are different. The data is flawed.

Response

The text states that there are 16 territories and the table correspondingly shows the location of those 16 territories.

Comment 56

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Citation: FEIS Page 220, Section 3.7.22.8

Page 220 3.7.22.8
The number of Willow Flycatcher sites that are intersected by routes in Table 82 is different than the number that is quoted in the narrative. The data is flawed.

Response

Correction to narrative has been made.

Comment 57

Action: Consider Additional Information

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 228 3.7.25.1.3 "There are little to no data on deer road kills along Forest roads". SAC [Sierra Access Coalition] would submit that there is no data because the potential for deer road kills, as well as road kills of other species, is virtually nonexistent. It is extremely rare to see a road kill on a Forest Service road. Vehicle collision with all species should be eliminated from the FEIS unless supporting evidence can be found.

Comment 58

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Page 230 3.7.25.2.1
The Diamond Mountain area closure during hunting season is not primarily for the protection of deer. Historically its intention has been to set aside an area to give hunters a non-motorized hunting experience. SAC [Sierra Access Coalition] supports this closure for the hunting experience, but it should not be referenced as a closure only for the protection of deer.

Response

The Diamond Mountan Closure is not cited in the FEIS as a closure for the protection of deer. The reference simply states "The closure has been implemented due to the high volume of vehicles in the Diamond Mountain area during deer season". The mention of the Diamond Mountain Closure in the FEIS is too simply state that it will continue under all the action alternatives. (See FEIS, page 259).

Comment 59

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Coppoletta, Michelle 2008. Biological Evaluation, pp. 19 and 32

SAC [Sierra Access Coalition] takes issue with the wording of this document's title. It promises a biological evaluation and only reveals potential effects to TES [Threatened and Endangered Species] plants. This document does not contain a quantitative botanical inventory of TES plants. The "List of Tables" on page iv is rich with locations of TES plants within 100' of the trails among the proposed alternatives and proposes indicator measures for Alternatives 2-thru-5. But neither of these sets of tabular illustration contain any historical plant inventory from a perspective of habitat or ecosystem density. There is no mention of these species' seed production and dispersal volumes, or their population dynamics. How long have these TES plant associations been unaffected? Or, if affected in the past under status quo conditions, where is the quantitative evidence of long or medium term degradation?

Response

The title inlcudes the words, "Biological Evaluation of Potential Effects..." and therefore it reveals potential effects as stated by SAC. The tables are quantitative, they provide numbers of TES plant occurrences and those numbers are derived from botanical surveys. The entire forest was not surveyed. The PNF maintains a quantitive and spatial database that records all known sensitive plant occurrences on the forest.

For some of the TES there is information available re historical plant inventory from a perspective of habitat and ecosystem density; for most of these species that info is not available. The scarcity of long-term data is disclosed on p. 19 of the BE. The BE does use best available info. The known info presented in the BE under “Affected environment 4.0” is derived from historical plant surveys. It is simply not possible for the FS to know if some of the TES species were more or less abundant on PNF system lands 50 years ago, 100 years ago, or 200 years ago. TES species are managed according to prescriptions that are periodically updated to consider any new information. The prescriptions are included in the BE.

These TES plant associations are affected; the Forest Service does not claim that they are unaffected.
The Forest service does not claim long or medium term degradation, and therefore does not present evidence for that claim. The BE states, “Motorized vehicle use within or in close proximity to this habitat has the potential to disrupt key hydrologic processes, which could have adverse indirect effects on the species” (p 32 of BE), and “these past management activities have likely had a negative impact….”(p 32 of BE).

Comment 60

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Summary of Effects (pg i)
This paragraph claims that the greater the trail mileage allowed, the higher the risk and severity of negative impacts to rare species and habitats. SAC [Sierra Access Coalition] asks, whatever the risk to date, how many of the plants inventoried on the PNF have slipped into "sensitive" status in the last 25 years? Has a field survey been conducted whose quantitative means are more detailed than FSM 2672.4? Otherwise, how could anyone claim that a consistent, sequential, quantified, measurement of rare plant distributions and density has been performed on the PNF? Timber management activities on the forest may have better inventory records than the Coppoletta Report. There's no offer of long-term plant statistics, only lists. Section 3.2, Analysis Methodology (pg 3) clearly identifies the pre-cursor to this report as a GIS-based reconnaissance survey, based in FSM 2672.4. Such methodology only established existence of plants and location relative to trails.

Response

The senstive plant species list was last updated in 2006/2007. Additions and deletions to the list are made periodically to accommodate new information. The list incorporates all available sources of scientific information including the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants of California, 6th Edition and the California Natural Diversity Database 2008.

Forest service does not claim that a consistent, sequential, quantified, measurement of rare plant distributions and density has been performed on the PNF.

The Coppoletta report uses both GIS-based reconnaissance and field surveys. The report discloses possible and likely effects to TES plant species based on known information.

Comment 61

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Coppoletta, M. 2008. Biological Evaluation, p. 18

Section 3.3 Assumptions (pg 4)
This section states that the analysis of botanical resources was based on certain assumptions. The most troubling of these is:
"Vehicle use on and off established trails has affected or has the potential to affect rare plant populations..." We're ready for the evidence of the claimed affects—where is it?

"Without specific prevention and/or control measures, invasive non-native plants (weeds) will continue to spread along and within surfaced and un-surfaced motorized vehicle roads/trails/areas." Good. The author must know of preventions and controls—show us a detailed list and the efficacy of these techniques that have been applied on ANY Region 5 forest; we'd like to read about it. Also, where is the quantitative evidence of the stated "invasion?" Has any action been taken (a management function) to slow or stop it, or are we going to assign sole blame to motorized vehicles?

Response

The BE disclosed assumptions. Several citations are given to support the assumption that "Vehicle use on and off established trails has affected or has the potential to affect rare plant populations..." (Davidson and Fox 1974; Wilshire, Shipley, and Nakata 1978; Ouren et al. 2007; Cole and Bayfield 1993). This is a reasonable and rational assumption.

Weed prevention practices that are practical include: education, outreach, and continued cooperation with federal, state, and private entities; requirements for use of weed-free materials for erosion control, route maintenance, and revegetation; cleaning of equipment used in route maintenance; and monitoring. Educational materials that emphasize weed prevention measures should be incorporated into the final NFTM maps or associated materials. In addition, the weed mitigations (i.e. hand-pulling) listed in Appendix C have been designed to reduce the risk of noxious weed spread along the proposed system trails. See page B-8 (Appendix B) of the Coppoletta report.

Hand pulling, mowing, and burning have all been used in the past several years to control noxious weed invasion on the PNF. The PNF is developing an Environmental Assessment to use herbicides on FS System land to control and eradicate noxious weeds.
There are many “invasions” of noxious weeds on the PNF. GIS shape files are available that provide measured area of many of these invasions. The majority of these invasions are along roadsides in areas of the forest that have been disturbed by human activities.

Standard language included in most FS environmental analyses is below. This was omitted from the Plumas Travel Management DEIS due to its impracticability for the project.

Any time project activities disturb the ground, invasion and spread of noxious weeds are a concern. To prevent the establishment or spread of noxious weeds Forest Service weed policies* must be followed. Below is a summary of those policies:
1. All off-road equipment will be washed prior to entering the Forest in accordance with the USFS protocol to prevent the unintentional spread of noxious weeds as described in contract provision C6.36.
2. Staging of equipment will be done in weed free areas. Also, equipment operating in areas known to be infested with noxious weeds will be washed prior to leaving the infested area. If new occurrences of noxious weeds are identified during treatment implementation, equipment used will be washed prior to leaving an infested area.
3. If project implementation calls for mulches, gravel, or fill, they will be certified weed free as these products become available.
4. Contact Michael Friend at 530-836-7167 for additional information or if weed identification is needed.
*Forest Service weed policies can be found in Contract Provision C6.36, Forest Service Manual 2081.2, and Appendix A of the Sierra Nevada Forest Plan Amendment Record of Decision.

Comment 62

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, Section 2.3.1, p. 11.

Section 3.4 Methodology by Action (pg 4)
This section outlines the steps to be taken between one and twenty years' time after closure to determine the effects of prohibiting cross-country, motorized vehicular travel on the PNF. To date, there is no assessment of past impacts over time of motorized cross-country travel, and no evidence suggesting there are mitigation measures which might better protect or benefit sensitive plants and their associates. Presumably, we might see improvement for sensitive plants 1-to-20 years hence with an absence of this kind of forest travel. How would we be able to know that, if the methodology criticized in #2 (above) is again, only a reconnaissance? Similarly, how would we know if there was no change?

Response

Section 2.3.1 on p. 11 of the DEIS describes the monitoring to be done for sensitive plants and noxious weeds. The reconnaissance was only the pre-cursor to the analysis. On the ground surveys were also done.

Comment 63

Action: Methodology and Assumptions

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The methods in this biological evaluation seem to be drawn from a USFS and BLM field approach previously used in implementation of the Northwest Forest Plan called "Survey and Manage." An examination of this protocol reveals it was used to intensively study areas in and adjacent to proposed timber sales, ahead of the logging activity, and subsequently following up to review impacts to plant and animal species. Here is an example of this technique from a Bureau of Land Management web site:

http://www.blm.gov/or/plans/surveyandmanage/index.htm

"I. Protocol Objectives

The survey protocol for vascular plants is designed to determine presence/absence, to describe and delineate population boundaries, and to document habitat conditions of Survey and Manage vascular plant species prior to ground disturbing activities. This information is needed to implement the Survey and Manage standards and guidelines.

Survey Protocol TAXONOMIC GROUP - Vascular Plants
ROD COMPONENTS - 1 and 2
OBJECTIVES - The survey protocol for vascular plants is designed to determine presence/absence, to describe and delineate population boundaries, and to document habitat conditions of Survey and Manage vascular plant species prior to ground disturbing activities. This information is needed to implement the Survey and Manage standards and guidelines.
TRIGGER - If the proposed project is to be implemented in FY 1999 or later, then surveys will occur if any of the following criteria are met, and the project could directly or indirectly impact the local population or its habitat:
A known site exists in the proposed project area.
The Survey and Manage species has been reported within the 5th field watershed where the project is located. The Survey and Manage species has been reported within an adjacent 5th field watershed.
The area under consideration occurs within the known or suspected range of the Survey and Manage species, and there is probability of suitable habitat within the proposed project area (determination of suitable habitat is discussed in Section I, Part III.A).
This protocol is intended to standardize methods typically followed by USDI Bureau of Land Management (BLM) and the USDA Forest Service (USFS) botany programs."

While SAC [Sierra Access Coalition] has no problem with the agency's choice to pursue Survey and Manage sampling on the PNF, we strenuously object to its use in guiding a choice of ANY transportation alternative other than Alternative 1 (status quo) because it is a discover-and-observe method. It identifies plants that MIGHT be affected by future cross country vehicle travel. It was the result of wandering the woods and noting plant locations, reviewing historical plant lists and previous forest notes on plant locations.

What it did NOT involve was reference to any (relevant) previous studies of vehicular damage from roads, and classified or unclassified trails by motor vehicles, including trucks, jeeps, and a variety of off-road vehicles on Plumas National Forest land or anywhere else in the Sierra Nevada Mountains. It took the same steps as the above BLM protocol for pending timber sales in Washington; activity that is far more confined and intense than vehicular use that is distributed along roads, trails, and through cross-country travel on the PNF. If we knew of quantified sources of impacts to the forest's plant environment from multiple classes of on and off-road vehicles, there would be justification for including this biological survey in the draft environmental assessment featuring the choice of one travel management alternative over another.

Beyond this biological review, if there was a survey of quantified physical damage by any or all kinds of ORVs on each or any kind of forest resource, that would be helpful for two reasons that ARE relevant to the choice of a travel management alternative. First, known damage spots could be prioritized for mitigation, and perhaps the best mitigation practices could be identified for each damage type with some trial and error. Second, roads or trails that contained such damage could be re-routed around the vulnerable area permanently (or temporarily, until mitigation measures were completed, or wet conditions no longer persisted).

A relevant example (but missing here) is that the federal government has taken similar steps for decades to re-route hiking/horse trails around meadows that suffered major long term damage.

Such areas weren't closed to access—but the access thoroughfare was re-designed. Sadly, and in some of its particular use of language, this Travel Management Biological Evaluation asserts that all vehicular traffic is a direct threat by virtue of its impact—an unsupported claim made with no evidence of damage measurements from ORV's or regular vehicles. This unsupported claim is backed by no objective, quantitative data.

It should also be noted that attempting to make a decision on a proposed transportation alternative primarily to manage recreational or woodcutting use ignores other major influences to plants. When wildfire is afoot, no one limits or monitors the compaction or disturbance of bulldozers to soils or the plants present on them. In fact, the very purpose of dozers is to go deep enough to remove combustible materials in a wide swath. And where dozers are unable to operate, you would be looking at terrain that few others would want to traverse in a vehicle, even for recreation.

Where fire itself has burned hot and cooked the mineral content of the former soil into impervious layers beneath the surface, there is a high probability of heavier runoff, and more eroded sediment. Even though USFS rehabilitation teams attempt to treat the area soon after fire passes—where is the quantitative study to compare this damage to that of cross-country OHV's? (Fortunately, these sources of risk to plants by non-ORV sources is included in the DEIS, page 281 on Cumulative Effects.)

Response

As stated on p. 4, the BE assumes that: "Vehicle use on and off established trails has affected or has the potential to affect rare plant populations, either directly by damage or death to individual plants from motorized vehicles (stem breaking, crushing, etc), or indirectly by altering the habitat through soil disturbance, changes in hydrologic functioning, or by the introduction of non-native, invasive plant species that can out-compete sensitive species for water, sunlight, and nutrients." That is a reasonable and realistic assumption.

The BE directly analyzes the effects of OHV activity. The cumulative effects section addresses other major effects to plants.

The DEIS concerns management of OHV activity and does not attempt to compare that activity to wildfire suppression activity.

The FS regularly limits disturbance from bulldozers and other fire suppression activities to plants and soils. Wildfire is an emergency that threatens human life, property, and natural resources and therefore is not managed in the same way as OHV activity.

Comment 64

Action: Update, Change, or Add Data to Existing Studies

Resource(s): T&E, Special Status (plants and animals)

Disposition: Resolved: Comment acknowledged; does not provide new information

Section 4.1 Rare Species (pg 7)
Table 3 lists all Federally Threatened, Candidate, and Region 5 Sensitive vascular plants, moss, lichen, and fungi on the PNF. It included 56 species, sub-species and varieties. Of the total, 54 were sensitive plants.

One plant was an FC (candidate for federal listing), and there were 14 noted occurrences on the PNF, all of them in meadows or streams. It is unlikely that the PNF road and trail system (including present unclassified trail routes) cut directly through meadows or parallel with stream courses (which the report says total 16,000 linear miles on the PNF). One plant was an FE (federally listed, and reported to occur on four sites along streams in the Plumas).

Response

It is correct that one plant, Webber's ivesia (Ivesia webberi), in table 3 of the BE is a candidate for federal listing. However, the only known occurrences of the plant on the PNF are historical and have not been relocated for many years. In table 3 the species is denoted as HI (i.e. Historical).

Layne's butterweed (Packera layneae) is a federally endangered plant known to occur on the PNF. This species is known to inhabit serpentine and gabbro-derived soils in open, upper foothill woodland, or lower mixed-conifer forest. It is not known to occur along streams and the four known PNF occurrences are not along streams.

Comment 65

Action: Adequacy of Studies (Best Available Science)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

DEIS Page 279 Direct Effects (on plants)
Under physical impacts, the DEIS cites four references in its narrative, only three of which are listed in the reference bibliography. The first (by Hall) is from 1980, and focuses exclusively on the Neuces River Drainage in Texas. The second (by Wilshire, et al) is from 1978, and deals with damages by ORVs to BLM lands in the Mojave

Desert. The third (by Ouren, et al) is from 2007. It is a compilation of multiple other articles, most of which involve areas outside the Sierra Nevada Mountains, including the two just mentioned. The last (by Van der Lippe & Kowarik) is from 2007.

It is a paper written for publication in Conservation Biology, and deals with dispersal of non-native plant seeds along paved highways in Germany, using seed sampling inside tunnels as an experimental control. It seems clear that none of these references exhibited as support for the crux of the matter (direct impact on plants by vehicles) is applicable to the Plumas National Forest. It also seems clear that having at least seen some work in this direction related to other public lands, the Plumas would have developed or commissioned scientific studies of its own on the subject of influences of motor vehicles on plants located on this public land where the travel plan will be implemented. Possibly, the Pacific Southwest Forest and Range Experiment Station could be encouraged to begin such work. But until that happens, there is no established correlation between OHVs and impacts on this forest that can be reliably assumed when choosing among the Alternatives.

Response

It is reasonable to assume that an OHV driving over an herbaceous (non-woody) plant that is 3 inches in height and has a stem that is .5 cm wide can break, damage, or kill that plant. It would not be reasonable for a federal government agency to complete a research project to support or deny that assumption.

It is reasonable and realistic to assume that noxious weeds can be spread by vehicles. The assumption is supported by professional natural resource managers across the nation. The BE includes several citations to support that assumption.

The Cal state Dept of Food and Ag, the Plumas-Sierra Weed Management Area, California Invasive Plant Council (CAL-IPC), provide information on the vectors that spread noxious weeds.

Comment 66

Action: Adequacy of Studies (Best Available Science)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

DEIS Page 297 (Management prescription)
"PNF management prescription: At least 30 percent of the known occurrences within a project area should be protected from all ground disturbing actions. Avoid impacting more than 50 percent of the known individuals within a project area over any 10 year period." This statement represents a heightened contrast with objective scientific study over time for plants and their habitats. The prescription represents itself as a cautious, responsible action in furtherance of plant protection. It uses this and two other "blanket boilerplate" prescriptions as a generic approach for plant protection without previous study on the stress to those plants covered by the prescription. Unfortunately, if the word "prescription" is to be believed—then it must be underlain by an objective "diagnosis", which has its roots in "symptoms." Again, SAC's [Sierra Access Coalition's] concern here is that those symptoms have not been identified through legitimate study. If we are to believe that the PNF is acting professionally, and under the auspices of both NEPA and the Multiple Use Sustained Yield Act of 1960, then, more detail revealing the categorization of those symptoms is called for.

Response

Each of the sensitive plant species is managed according to management prescription that is species-specific. Some prescriptions are more detailed than others because more information about that species is available. They are not intended to act as a "blanket boilerplate" generic approach. These prescriptions are designed to maintain viable populations of sensitive plant species as directed under our Forest Land & Resource Management Plan until species management guides or conservation assessments are in place for these species. The prescriptions are updated periodically to incorporate any new information; the most recent update was done in 2007.

Comment 67

Action: Cumulative/Combined Effects

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

DEIS Page 298 Cumulative Effects (on Pyrrocoma lucida)
"The proposed trails are relatively well-established; therefore, the largest impact to these two occurrences most likely occurred at the time the route was created or constructed." ...and... "due to the small proportion of the two individual occurrences affected (less than 0.5 percent)..."

This passage of the DEIS seems to be the first occurrence where the PNF has suggested that the majority of any (previously unmeasured) impact on this species took place when the road or trail was first established. This is an assumption that SAC [Sierra Access Coalition] would applaud. And, it would be a good start to a User Group - PNF partnership to keep more trail routes open, to connect other "dead ends" with short sections to create "loops," and to study the baseline and after-effects of each. With baseline information growing and in-hand, the agency would be in a position to consider whether more trail mileage over time did a better job of distributing any impact over more miles than in markedly restricting trail mileage. If it chose temporary closures for mitigation, survey mechanisms on the remaining routes could be monitored for changes compared to baseline. Extremes of weather phenomena and fire suppression traffic could also be studied simultaneously.

One benefit that could come from such work might be that engineering techniques could be identified that construct motorized recreational vehicle trail sections with the least possible impact during construction and the least on-going impact over years of use. Local geography could possibly assist this effort: climbs and descents in rocky territories, traverses with cross drainage for more sensitive soil and habitat conditions. But none of this kind of customization would be possible without objective and on-going studies, including quantitative measurements of use and impact.

Just because the PNF was not able to quote any other studies of this kind on similar national forests does not mean that they should retreat from such an effort, right here. The Pacific Southwest Forest and Range Experiment Station may have the expertise to help pursue such research.

Response

The DEIS uses the best available information. It does not prevent future study but it is not analyzing the feasibility of future study.

Comment 68

Action: Cumulative/Combined Effects

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

DEIS Page 312 (Direct and Indirect Effects on Astragalus lentiformis)

"In general, this species appears to respond favorably to light-to-moderate disturbance and PNF botanists have observed this species growing directly in roadbeds. Surveys conducted during the summer of 2007 also noted individual plants growing in the center of and along the edge of the proposed trails (Vollmar 2007). While past management has demonstrated that certain levels of soil displacement and disturbance may be beneficial, the intensity and frequency of disturbance that is tolerable to this species has not been fully quantified."

SAC [Sierra Access Coalition] appreciates the objectivity of this observation that some plants (in this case a woody herb) can sustain themselves under disturbance. Certainly, it cannot be expected that a majority of the other 55 plants in the PNF survey would demonstrate similar ruggedness. But this excerpt points to even the Forest Service's realization that influence and disturbance to plants cannot be known without more study.

Response

The forest service has revealed the potential effects of the alternatives and made determinations using the best available information. The BE and the DEIS do not claim that the forest service knows how plants will be affected by the alternatives.

Comment 69

Action: Adequacy of Studies (Best Available Science)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Noxious Weeds

Any on-the-ground, studied findings are opaque-to-invisible. There is not a logical line of extension between the discovery of a noxious weed growing on the PNF and real data establishing a trend and speed of ANY particular vector of distribution. The lack of any consistent data collection designed to separate fact from pretense was a repeat of the (misnamed) Biological Study that was reviewed. The Forest Service must be criticized for featuring alarmist conclusions on noxious weed spread based on misleading sites (such as the overexposed territory next to the railroad right-of-way).

We [Sierra Access Coalition] refer to the Forest Service's approach to noxious weeds as obtuse because of the attitude it attempts to cloak in "science." It seems this agency is knowingly misrepresenting facts on the ground by a combination of factors. Its attitude is that because they say it, it must be science. Because there are trails and roads on the forest, and because there are noxious weeds on the forest, all further spread of such weeds would be caused ONLY by the use of off-road vehicles, and then only on those routes which they have (to date) refused to propose for inclusion into the road and trail system. It is a self-fulfilling prophecy because they say it is. But it is without foundation.

Response

The BE provides several citations to support the assumption that OHV activity can spread noxious weeds. That assumption is commonly accepted by professional natural resource managers throughout the United States. It is reasonable and realistic. There are many noxious weed sites in the PNF that pose a risk to natural resources. Responsible forest management and legal direction require the PNF to address that risk.

The forest service need not defend statements that it has not made.

Comment 70

Action: Decisionmaking Philosophy

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

We [Sierra Access Coalition] can and should expect more from an agency of our government. Laws at both the federal and state level (NEPA & CEQA) have taken pains to provide a legitimate process for adjudicating the balance between land use and prohibitions of use, or mitigated usage. These are based in legal procedure and in science. As it stands today, with its travel management phenomenon, this agency is attempting to masquerade as having used ample measures of both. Its approach is brazen, but of limited merit.

Does the Forest Service expect us to believe their motives? It certainly seems that lacking true allegiance to legal procedure and legitmate science, two possible conclusions stand out. Either they must lack adequate competence to suggest policy changes underpinned by good data, or they must be moving in haste (driven by forces as yet unseen) to enact a pre-conceived agenda. Users and the forest itself deserve better.

Managing the PNF is complicated, to be sure. But managing means keeping one's fingers on the pulse of what is happening, and tracking inputs over time. Managing means making choices, presumably for the benefit of all, and within the law. Management by unsupported restriction or lockout is neither logical nor legal.

To the extent that their preferred outcome prevails, the U.S. Forest Service's motives and methods will become clear. This agency won't adequately fight the fight to protect the forest from (unnatural) catastrophic wildfire and resulting serious damage. It won't take adequate steps to prevent most of its operating budget from allocation only to project fire suppression. But it is aiming to severely restrict vehicle access and use to all others not associated with "emergency" mobilization.

This agency won't act to adequately protect the resource from immense damage, yet will not take steps to identify, catalog, monitor, and learn to mitigate trail and road damage from use of all kinds. It seems to have chosen to abandon Multiple Use and management rather than engage users and user-groups as partners in a long-term association that might protect against damage and protect against a loss of public access.

Response

The Interdisciplinary Team relied on public involvement to ensure that a full range of alternatives, representing a broad array of perspectives, would be analyzed. Public involvement occurred during three key periods: first during the public collaboration process that began in 2004, second during the 60-day public scoping period for the Notice of Intent (NOI), and third during meetings with public groups to explore issues they raised during scoping.
During the summer and fall of 2004, an independent contractor reviewed and mapped routes and areas used by OHVs on the Forest. During 2004 and 2005, the Forest also sought route information from the public and validated route locations and mapped them. On May 14, 2005, the Forest provided on-the-ground training for the public to locate and map their favorite riding areas so they could effectively provide that information to the Forest Service.
In December 2006, public meetings were held in Oroville, Portola, and Quincy explaining the temporary Forest Order (effective December 31, 2006) that restricted OHV use to mapped roads, trails and areas.
By April 2007, the Forest Service developed the “first cut” route map, which included 220 miles of proposed motorized trails. The “first cut” consisted of known routes used by the public, including destinations, loops, and spur routes to fishing access and favorite dispersed camping sites. The “first cut” avoided routes on private land with no right of way, routes where motorized use would conflict with existing uses, and routes with measurable resource impacts. Information meetings were held in Quincy, Portola, and Oroville in April. Followup workshops were held in each city during May.

In the spring of 2007, a series of three public meetings and three workshops were conducted to identify which of the routes and areas should become part of the proposed action, the type of use that each would have, and locations to be considered for dispersed recreation use per the new Travel Management Rule. The concept of “mixed use” was also introduced during these meetings. At the first session of the two-part series, public meetings were

held in Quincy (April 17) Portola (April 18), and Oroville (April 19). At the second set of workshops, individuals worked with Forest Service specialists to identify important routes. These meetings were held in Blairsden (May 2), Quincy (May 3) and Oroville (May 10). Groups shared their ideas and their various concerns. Roughly 300 people participated in these workshops. In early 2007, an e-mail update was issued sharing information on the meetings and the outcome. The Forest Service Interdisciplinary Team took this information and developed the proposed action for the NOI. The proposed action was designed to include as many routes as possible that were requested by the public, including some with known or suspected resource impacts.

In January 2008, the Forest Service completed the Proposed Action and Notice of Intent to Prepare an Environmental Impact Statement based on comments from the meetings held in the spring of 2007. The comment period on the proposed action began on January 3, 2008, and ended March 3, 2008. Presentations to a variety of groups, phone calls, news releases, website postings and emails were used to alert the public of the opportunity to comment on the proposed action. Public meetings were held in Blairsden (January 15), in Quincy (January 22) and in Oroville (January 29) to explain the Proposed Action. Over 3,300 comments were received. Many were identical emails.

Comment 71

Action: Adequacy of Studies (Best Available Science)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

SAC [Sierra Access Coalition] challenges the validity of this biological assessment for reasons previously expressed. There has been no study on the Plumas National Forest which has been designed to directly measure impacts to plants from ANY type of vehicular use nearby. There is a lack of any recognized approach to gather objective evidence such as stratified random sampling, photo point analysis over time, or categorization and gradation of influences by vehicles to rare plants.

In addition, if damage has been anecdotally gathered that plants have been harmed, it remains a mystery why the agency has not already taken action to more frequently monitor and measure such examples and attempt to identify and apply restorative management practices as mitigation. It is not scientifically valid to simply assume that a heightened level of risk will automatically catapult PNF plant species into federal listing status. And continuing the previously illustrated subjective methods (FSM 2672.4) for up to 20 years does nothing to establish measured baseline data.

NEPA's process and content use the term "mitigation" to describe prescriptive action that can be taken to minimize adverse impacts from an intended project in any environment (urban, suburban, or public land). These mitigations are intended to render the environment in question better preserved, and not degraded. In order to do that, one must establish an exhaustive understanding, (scientifically derived) of the status of that environment in advance of the project proposal. Clearly, this has not been done on the Plumas National Forest, and the methodology utilized in this Draft Environmental Impact Statement has only identified resources worthy of concern—it has not quantified the status quo. What measured impact does transportation actually cause on the variety of forest environments here, and how much of this impact would remain from management activities (particularly fire suppression), even if recreational travel did not occur at all?

Without long-term, real scientific study on this particular forest, though some might GUESS, no one can KNOW what population trends in rare plants here are natural, or caused by longer periods of drought, or influenced by global warming, or affected by ash fall from increased catastrophic wildfires.

Response

It is reasonable to assume that an OHV driving over an herbaceous plant (e.g. Astragalus webberi, Eleocharus torticulmis, Monardella folletti) can break, damage, or kill that plant. That assumption is disclosed

The bioligiccal evaluation did not simply assume that a heightened level of risk will automatically catapult PNF plant species into federal listing status. It determines that for some species implementation of some alterniatives "may affect individuals, and is likely toresult in a trend toward federal listing or loss of viability for the species". This determination was made with consideration of the number and size of known occurrences of the species and the amount of available its habitat on the PNF.

The forest service recognizes the existence of many other variables in climate, weather, wildfire and makes determinations based on the best available information.

Comment 72

Action: Adequacy of Studies (Best Available Science)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Region Five of the U.S. Forest Service is responsible for providing recreation opportunities on its forests, along with protection of that environment. Not quantifying and monitoring that environment AND the effects of recreation activities there—is not management. It may be stewardship in need of corrective lenses. Management by drastic changes in forest rules that restrict use is neither fair nor scientifically justified at this time.

Comment 73

Action: Public Involvement

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

There is a need and an opportunity for this agency to promote public awareness, and a public contact campaign to generate better manners and cautions by forest users. Such leadership would be a great help in forging partnerships with user groups (who would gladly shoulder some of the workload) to spread best use practices and assist in mitigation field work.

Comment 74

Action: Alternatives General (add, change, delete)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

SAC [sierra Access Coalition] remains in support of a new Alternative 6, which prohibits cross country travel on the forest. This, in itself would negate most of any possible impacts to plants by motorized vehicular travel that were dubiously assumed in the biological evaluation and the DEIS. SAC seeks a delay in the agency's current plan to restrict vehicles to one car length from roads. Dispersed camping on the forest deserves a more thoughtful look prior to the effective cessation the PNF says it is seeking.

Response

It is reasonable to assume that an OHV driving over an herbaceous plant (e.g. Astragalus webberi, Eleocharus torticulmis, Monardella folletti) can break, damage, or kill that plant. That assumption is disclosed in the BE.

Prohibition of cross-country travel would not protect those sensitive plant species that are located on or adjacent to OHV routes.

Comment 75

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Cultural Resources

Disposition: Resolved: Other (SEE RESPONSE)

Cultural Resources
SAC [Sierra Access Coalition] is committed to protecting cultural resources. But we believe there are still opportunities for routes that are located in the general proximity of cultural sites. We request data for each route that is not proposed for designation. Other resources admit that their GIS data is not accurate, so we have to question whether the cultural resource layer is accurate. Data should be provided in the FEIS to show how precisely how close each route is to a cultural site. The actual location of both the route and the cultural site boundaries on the GIS layer may not be accurate enough to make an office evaluation. We respect the location of the cultural sites and are not requesting the specific site locations to be disclosed, but the data for each route that shows the proximity to the actual boundary of the sites should be disclosed. We would also like to know which, if any, if these sites were field verified. For example: 8M19 was thought to be the Beckwourth Trail during analysis but was later found this was not true. If a field verification was made, this error would have been avoided. There is no explanation of what the "Cultural Resource Code" refers to.

Response

Effects ratings for cultural resources are based solely on documented effects from vehicular activity, not on proximity of sites to routes, or on the presence or absence of sites at or near a given route. The only exception to this is the Beckwourth National Historic Trail. Any motorized use of the Beckwourth Trail is considered an extreme effect to the characteristics of the property which form the basis for its significance.

GIS data was only used as a planning and documentation tool. No effects determinations were based on “office evaluations.” All known sites within the defined project area were monitored in the field to identify the nature and extent of resource impacts, if any.

In regard to 8M19, the route was originally identified as having an extreme rating due to the presence of the Beckwourth Trail. The vicinity of the route is mingled with many modern linear features, including the proposed route. The confusion in this matter was not related to an "office evaluation," but rather to the fact that the archaeological field crew could not clearly identify which of the linear features was the proposed route (it was not flagged or demarcated at the time of the field visit).

The Forest Service does not disclose site location data. Section 9 of the Archaeological Resources Protection Act (16 U.S.C. 470hh) prohibits disclosure of information concerning the location and nature of archaeological resources, if the release of such information risks harm to those resources. Also, under Section 304(a) of the National Historic Preservation Act (16 U.S.C. 470w-3(a)), information about the location, character, or ownership of historic resources shall be withheld from disclosure to the public provided that the Secretary of the Interior and the Forest Service determine disclosure may (1) cause a significant invasion of privacy; (2) risk harm to the historic resources; or (3) impede the use of traditional religious sites by practitioners.

Comment 76

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Fuelwood cutting
Woodcutting needs to be listed in 2.4 Alternatives Considered, but Eliminated from Detailed Analysis. This is one of the primary concerns of the majority of SAC [Sierra Access Coalition] members. The Forest Service states that fuelwood cutting is NOT part of the RDP and 36CFR 261.50(E) allows:
- “Pursuant to 36 CFR 261.50(e), the following persons are exempt from this order. Any Federal, State, or . . .
- Persons with a permit from the Forest Service specifically authorizing the otherwise prohibited act or omission.”

Currently (before a decision on the RDP has even been made) all firewood permits reference the FEIS for the PNF Public Motorized Travel Management results. This is contradictory to the DEIS, which states on page 33 that fuelwood permits are not part of the proposal. Areas that are being proposed for closure to vehicles in this DEIS have firewood potential and have been used for decades. Firewood cutting must be fully addressed in the DEIS if the fuelwood permit is tied to any roads or routes in the RDP. Currently, fuelwood permits allow the public to cut firewood forestwide. But limiting the public to only NFTS roads for retrieval is not sufficient access, considering the limited availability of firewood.

The Mt Hough District made some log decks available to the public in late 2008. This was a good step forward, but more consideration needs to be made for woodcutters. The requirement to stay within 100 feet of all roads needs to be removed from the firewood cutting permit.

Local saw shop revenues have significantly increased over the last 5 years by 57% and 2008 has increases of 28% over the prior year alone. This clearly shows the need for firewood cutting by the public and any permit constraints tied to the RDP decrease fire wood availability.

The Forest Service is moving towards working to reduce the carbon foot print. Dead tree removal by the permit would contribute to reducing the carbon footprint. The analysis needs to address the accumulation and risk of fuel loading, as well as additional carbon being produced by these dead trees. Since woodcutting is being effectively restricted by reducing vehicle access under the Travel Management Plan, an analysis must be included in the FEIS.

The President has repeatedly said that everyone needs to do everything possible to reduce reliance on foreign oil. With firewood becoming increasingly scarce and the need to travel farther burning more fuel, the public will increase their use of heating oil. The Forest Service has said that there is a lot of firewood available along main roads, but this is not the case. An analysis of the abundance of firewood needs to be included in the FEIS.

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Comment 77

Action: Mapping, GIS

Resource(s): Wetlands

Disposition: Resolved: Other (SEE RESPONSE)

GIS Data
Existing GIS stream course center lines and buffers appear to be inaccurate when used to determine if a route is to be within a Riparian Conservation Area (RCA) and excluded from analysis. All stream course center lines and buffers are computer generated and have proven to be incorrectly representative of what is actually on the ground. RCA location is so poor it has missed routes as well as substantially over overestimated inclusions. This over estimates RCAs. This data is unacceptable to use for NEPA analysis and implementation. This unreliable data must not be used to determine whether a route is included or excluded without first field verifying the center line of all streams.

Response

Existing GIS stream data is the best available information for analyzing effects to stream and aquatic resources. When the stream layer, in particular perennial and intermittant streams, is overlaid with aerail photos, the stream layer provides an accurate location of stream courses.

Comment 78

Action: Mapping, GIS

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Ch. 3 Soil and Water Effects Analysis Methodology Section

Page 77 Indicator #2
The DEIS admits to errors in the stream and meadow layers. The Forest Service must GPS and field verify all stream centerlines and change stream class from perennial, intermittent, ephemeral and swale. Inventory is needed for where it changes each stream class and center line for correct true spatial relationship.

Response

Limitations to the stream and meadow GIS layers are described in section 3.5.4 under the analysis methodology for mileage of proposed trails in hydrologically sensitive areas. Despite these limitations, analysis of the GIS layers provide a good coarse evaluation of proposed trail location in relation to stream and wetland locations. That coarse evaluation was refined by field survey data. The full length of each proposed trail was field surveyed. Each stream crossing was located and evaluated and the stream class (perennial, intermittent or ephemeral) at each crossing was noted. The proximity of each trail segment to the nearest waterbody was also noted (see the Field Data Collection Form in Appendix C of the Soil and Water Resource Report).

Comment 79

Action: Enforcement/Funding/Staffing

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Law Enforcement
On page 34 the DEIS states:

"Users in communities adjacent to the Forest would comply within 1 to years. Frequent users but further in distance from the Forest would comply within 2 to 3 years. Infrequent users regardless of distance may take up to 5 years to comply."

The FEIS should document why local residents are being punished while nonresidents can ignore the law for 5 years. Which other laws will be enforced selectively, based on a person's county of residence?

Response

These are assumptions made as to when the public could be expected to understand the new travel restrictions.

Comment 80

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Recreation Resources

We [Sierra Access Coalition] are unable to analyze how this project fits into the vision of the 1988 Land and Resource Management Plan because the Forest Service has been unable to provide SAC with the Off-Road Vehicle Travel Plan dated 1/12/77. We have waited 2 months for a copy of this plan but the Forest Service has been unable to produce it. As of this writing, the Forest Service is looking for the 1989 Off-Highway Vehicle Plan in place of the 1977 version, which cannot be located.

The change from an open to cross-country travel condition to a cross-country travel prohibited condition will reduce the availability of acreage for both motorized recreation as well as motorized access to dispersed recreation activities.

There will be no positive recreational changes by this project, only negative changes. Even non-motorized users such as hikers and bikers will have less access to travel to their favorite areas to hike and ride. Hikers will have a long hike, in some cases, just to get to their main trail head. Staging areas may be moved further away from trails. There are no recreational benefits to the public documented in the DEIS.

Proposed additions to the NFTS must have a beneficial effect on motorized recreation opportunities by providing a variety of trail riding experiences and increasing the amount of motorized recreation opportunities (loops, connectors). The beneficial effect has not been documented in the DEIS.

Proposed changes and additions to the NFTS must have a beneficial effect on the amount of motorized access to dispersed recreation opportunities available. This benefit has not been documented in the DEIS. The existing recreation has not met the goal of the LMP in regards to OHV development. This must to be addressed in the FEIS to provide high quality OHV opportunities.

There has never been any use analysis of the unclassified routes and apparently no data exists (traffic counts, etc). As a result it is highly speculative to make assumptions of the level of use on the unclassified routes.

Numerous times we have received assurance from the Forest Service that additional routes will be considered annually. The prohibition of cross-country travel must not be a change to ROS, it is simply a prohibition within that ROS 'zone' to travel off of designated routes. When areas are denied access by motorized vehicles under this first plan, they must not be placed into "semi-primitive non-motorized" or "primitive non-motorized" status. This first phase of this plan should not preclude any future actions for OHV use. All inventoried routes that have GIS data need to remain in the database using the "u" numbered identifiers so future routes can be easily located and resubmitted annually for addition to the NFTS.

OHV access to all major lakes, rivers, and campgrounds needs to be retained. Where campground access is currently on maintenance level 3-5 roads there needs to be additional access provided for OHVs, such as a trail on the shoulder or other suitable location. There are several major recreation areas that are being denied OHV access by this plan. In order to offer a quality OHV recreation experience, alternatives must be developed that include a commitment to provide a future plan for alternate access for OHVs to continue the access to developed recreation areas that they currently enjoy. Major recreation areas include Lake Davis, Frenchman Lake, Little Grass Valley, Bucks Lake, and others. No non-motorized users will be displaced because this project only deals with existing uses.

Response

The 1977 Plumas National Forest Off-Road Vehicle Control Plan was provided to SAC on March 17, 2009. It documents the addition of 8 areas closed to all vehicles around Davis, Antelope, Round Valley, Butt, Fowler and Frenchman Lakes and Challenge Experimental Forest and Tamarack Flat totaling 29,500 acres.

See Recreation Section 3.2.5.1 Indicator Measure 4 for specific information on reduced dispersed camping opportunities. Additional trails can be added in the future to access dispersed camp sites that were not included in this analysis.

There are no trail heads eliminated by a ban on cross county travel.

No changes to the Plumas National Forest Recreation Opportunity Spectrum (ROS) will occur with this project. The abundance of System Roads will provide ample opportunity for the motorized user.

SAC needs to work with the Ranger Districts to develop access to developed recreation areas.

Comment 81

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

3.2.3.4
(2. and 3.) We [Sierra Access Coalition] agree with these methodologies, which can contribute to positive OHV experiences. Show each alternative's benefits under these methodologies.

Response

See 3.2.5.1 Indicator Measure 3-Mileage by vehicle type for each action alternative and Indicator Measure 4-Inventoried dispersed sites.

Comment 82

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

3.2.3.4 (2.)
Show documentation to explain what dispersed recreation opportunities are, how they will change (i.e. locations of dispersed campsites that will no longer be accessible by vehicle), and how the Travel Management Plan contributes positive changes to these opportunities. Negative changes should also be displayed so they are evident to the reader.

Response

Dispersed recreation opportunities were updated to include sites that are available from system roads. Trail access to dispersed sites may be added in the future. 3.2.5.1 Indicator Measure 4 displays the impacts to disperse sites.

Comment 83

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 41 Table 5
This table is flawed because driving for pleasure should be included with OHV use. Both will be affected by this project. Were 667,600 people interviewed or is this an assumed number? For those visitors that are listed as "non-motorized", how did they travel to their chosen recreation area on the forest? Did they walk or use a motorized vehicle to get to the forest, or did they ride bikes or walk to get there? "Relaxing" category—Did these people drive or walk to the area? "Viewing natural features" category—Did these people drive or walk to the area? "Viewing wildlife" category--Did these people drive or walk to the area? "Fishing" category--Did these people drive or walk to the area? The 1st paragraph under Table 5 is flawed and needs to be removed or adjusted to show if these non-motorized users drove to these areas or walked from outside the forest. The term OHV includes all motorized vehicles in the forest, not just motorcycle and quad riders. The circumstances of the interview need to be put into context. Where were these users interviewed? Were they on hiking trails, OHV trails, in campgrounds, in dispersed campsites, etc. The physical location of the interview is extremely important as it could show a bias in the resulting data.

Response

Section 3.2.4 Affected Environment has been updated to include driving for pleasure. When motorized uses are combined, including OHV use, and driving for pleasure, the approximated number of visits is 190,300 or 28.5% and the main activity is 23,350 or 3.5%. Most of the driving for pleasure occurs on system Roads. Most of the non-motorized uses travel to their chosen recreation area on system roads. Interviews occurred at major access points leading to the forest.

Comment 84

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Table 6 needs Alternative 1 and Alternative 6 added. All routes need to be added to the NFTS in roaded natural

areas.

Response

Table 6 shows trail additions. Alternative 1 has no trail additions and Alternative 6 (2.4.1) was considered but eliminated from detailed analysis.

Comment 85

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 45
The document states that Alternative 2 "provides the greatest amount of access to dispersed use areas", but on page 46 it says Alternative 5 "provides the greatest amount of access to dispersed use areas". This data is flawed. Which alternative has the most? Where are the areas located?

Response

The analysis was corrected to state that Alternative 5 has the second highest amount of access to dispersed use areas of the alternatives that add trails to the NFTS.

Comment 86

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

3.2.5.2
Under Alternatives 1 and 2, both state they provide the most OHV opportunity which is not true. Alternative 2 would greatly reduce recreational opportunities with the net loss of 745 miles over Alternative 1.

Response

Alternative 1 has the most motorized travel opportunity while alternative 2 has the highest motorized trail mileage.

Comment 87

Action: Cumulative/Combined Effects

Resource(s): Recreation

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

3.2.5.6.1
The cumulative effects will be great with the loss of cross country travel. An additional loss of 745 miles of existing trails is another part of the cumulative effects. There are several miles of trails being dropped during the public comment period of the DEIS, so even more trails are being lost than is represented in this figure.

The opportunities for dispersed recreation are greatly and negatively impacted by this plan. Public scoping that began in 2003 did not include any reference dispersed camping, so the general public may not be aware of this part of the project. On page 33 #10, the DEIS states "dispersed recreation activities (i.e. activities which occur after the motor vehicle stops such as: camping, hunting, fishing, hiking, etc) are not part of the scope of the proposed action". However, this is contradicted on page 44 where it states that "motorized vehicle access to dispersed recreation opportunity is reduced in all action alternatives (Table 10)". Table 10 indicates that 91 dispersed sites were inventoried. It's inconceivable that only 91 sites exist across the 1 million acres on the Plumas. The footnote in Table 10 says that 35 of these sites are located within 300' of water, but in another contradiction the table shows no more than 31 are located within 300' of water. Whatever the actual number is, those routes are being dropped under the various alternatives, leaving 60 or less sites on the entire Plumas NF. This eliminates vehicle access to many long-time family heritage campsites, fishing and hunting areas, tribal use areas that require motorized vehicle access for elders, and other uses. It is inappropriate to first state that the issue of dispersed camping is outside of the scope of the project, but then state later in the document that there are significant

impacts with the reduction of up to 33% of the existing dispersed campsites on the forest. The same comment can be made for firewood cutting, which is severely restricted by the proposed reduction in miles of road that can legally be accessed for fuelwood cutting activities. The document does not acknowledge that these historic legal uses of the forest are a major effect to the public.

Response

The proposed trail mileage for Alternative 4 and 5 have increased based on public comments. Dispersed recreation opportunities were updated to include sites that are available from system roads. Trail access to dispersed sites may be added in the future. 3.2.5.1 Indicator Measure 4 displays the impacts to disperse sites. The assumption made in Chapter 2, is that the dispersed recreational activities are not restricted, only the way you access those sites. The recreation section shows the dispersed sites that are accessible by motorized vehicles. The inventory of dispersed sites is a sample of sites that can be found on the Plumas National Forest.

Comment 88

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

36 CFR 212.51(b) gives the Forest Service latitude to allow access to dispersed campsites. This latitude must be used to allow continuation of the historic use that the public has enjoyed in the past.

People prefer to camp near water. This restriction is unreasonable and capricious. This action particularly impacts disabled and elderly users, which is not in compliance with The Rehabilitation Act of 2003 and other laws.

One example is the proposed Special Interest Area, on Grizzly Ridge just north of Brady's Camp. This SIA has been proposed for decades, yet no final decision has ever been made. They are similar to the CIRAs proposed in Alternative 3. There is no regulatory or statutory support for restricting any lawful activity in CIRAs or SIAs. At this time, SAC is not challenging the validity of the SIA because that is outside of the scope of this project and there is no data presented in the DEIS to support the SIA's value. But since it is a proposed SIA, motorized vehicles are being exempted from this area under this plan. The routes that the public requested in this area should be added to the plan because:
1) At this point the SIA is nothing more than just a proposal, just as the CIRAs are only a proposal. The Travel Management Plan will have a decision next year so it should be considered on its own merits rather than comparing it with other proposals that have no eminent decision; and
2) Access to that area is not in compliance with accessibility laws.
3) There are already laws in place to protect resources, and law enforcement can cite any abuse.

As the Forest Service has been telling us, the Travel Management Plan will be revisited annually and adjustments can be made each year, including deleting routes from SIAs if a decision is made at a later date.

Overall, the recreation analysis is flawed and is not responsive to public needs and requests. Public scoping was not adequate. All alternatives, except for alternative 1, produce substantial negative effects to recreation.

Response

Access to dispersed campsites is not restrict by this document, just how you access the campsites. Camping near water is not restricted by this document.

The Plumas National Forest has worked hard with the public to respond to their needs and requests. Numerous public meetings and workshops have occured over the past 4 years.

Comment 89

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Transportation Facilities
When the majority of roads on the Plumas were created, they were built for logging, fire access, and other land management uses. The fact that they were never brought into the transportation system does not make them "unauthorized", "illegal", or "user created". In the FEIS, the term "unclassified" should replace the terms "unauthorized", "illegal", or "user created". There was a need for these roads at the time they were created, and it doesn't appear to have been addressed whether or not a need for these roads will continue for other than recreational purposes. We [Sierra Access Coalition] agree that at times portions of maintenance level 1, 2 and 3 roads may have restricted use due to fire, timber sales, and other administrative uses that close the roads to public

travel on a temporary basis.

Response

The Washington Office has determined that a road or trail is either an authorized or unauthorized road or trail. Following that direction, all the routes we are dealing with are considered unauthorized because they are not a system road or trail or they are not authorized by permit or special use. The majority of inventoried routes were constructed in timber sales as temporary roads or skid trails. They were not intended to be used in the future, used only for a short time frame. Many routes have also been created my users by repeated use on routes outside of timber sales.

Comment 90

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

A high priority for many SAC [Sierra Access Coalition] members is the issue of green sticker vehicle use on maintenance level 3 roads. On page 50, Section 3.3, the DEIS states: "The California Vehicle Code (CVC) regulates the use of motor vehicles in California, including motor vehicles used on the National Forests." The CHP letter from Deputy Commissioner J.A. Farrow dated December 19, 2007 (see Exhibit 3) is the appropriate interpretation of the CVC by the agency that has jurisdiction over this law. In this letter, Farrow reviewed the January 2005 letter and concluded that "for the purpose of this division, the term 'highway' does not include fire trails, logging roads, service roads regardless of surface composition, or other roughly graded trails and roads upon which vehicular travel by the public is permitted." SAC contends that maintenance level 3 roads should be open to all vehicular traffic, whether legally licensed or green sticker, because CVC does not apply to these roads. CHP is the agency with authority to interpret and enforce the CVC on California roads.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on langauge and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads.

Comment 91

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Road maintenance costs in Table 12 on page 53 are not accurate. Pete Hochrein gave SAC [Sierra Access Coalition] the correct numbers. The correct figures from Hochrein were based on the most recent contracts. ML 1 and 2 roads cost $82/mile (3502 miles of roads for an annual maintenance cost of $287,164.) ML 3 roads cost $407/mile cost (404 miles of roads for an annual maintenance cost of $164,428.) This is an annual total of $451,592. This is a mistake of $1,106,471. This table needs to be corrected to show the new dollar figures quoted by Hochrein and the actual mileage of maintenance that is performed annually. This table shows that 100% of the roads on the Plumas are maintained every year, but in public meetings I've been told that only a percentage of roads are maintained in any given year.

Response

The Facilities Section of Chapter 3 has been modified to reflect these contract costs.

Comment 92

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 55 3.3.3.2.1 (1B2)
The document states there are 11.3 miles of mixed use. Which roads are they? There doesn't appear to be a list of these roads in the DEIS, traffic counts, or other supporting documentation for these routes. It is arbitrary and capricious for the Forest Service to limit the mixed use to just one route per district. There are many opportunities on the Plumas that were not given consideration, in spite of repeated requests from the public.

Response

See Table 2. The Plumas National Forest Engineer has determined that 23N28 and 28N01 would be more appropriately managed as maintenance level 2 roads making them available for mixed use. 24N28 has been approved by the Regional Office for mixed use. The Plumas National Forest will continue to review maintenance level 3 roads for mixed use analysis and submittal to the Regional Office.

Comment 93

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

3.3.3.2.2 Transportation System Affordability
Unclassified routes are currently not maintained, except by users and volunteers. The routes that have been analyzed by specialists have been found to have no significant resource damage on them, so the current level of maintenance appears to be adequate with the exception of those routes that have been identified for specific mitigation measures. Therefore, there is little or no increase in annual maintenance costs for the addition of these unclassified routes. In fact, the Modoc NF doesn't perform any maintenance on their level 2 roads. The Forest Service Handbook (FSH 2309.18, 2.32a, Ex. 01) shows the standard for "Easy, More Difficult, and Most Difficult" trails. The standard includes a number of obstacles that are desirable, such a down logs and rocks. This demonstrates that the trails are not expected or desired to be maintained to a higher standard. The "Deferred Road Maintenance Backlog" does not refer to trails, but only to higher standard NFTS roads. The Final Rule states the transportation system affordability should be considered, but scarcity of funds should not lead to blanket closures of routes. The current NFTS is not held to a zero tolerance for resource damage, as evidenced by the condition of the existing NFTS roads. Holding OHV routes to a higher standard of maintenance than the current NFTS is not defendable.

Response

Maintenance on most routes over time will be needed as with any trail. The bulk of maintenance requires reestablishing trail drainage and reducing brush along the edge of trails.

Comment 94

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

3.3.2.1 Transportation Specific Assumptions
Item 2 states that fuelwood gathering is outside of the scope of this proposal. Therefore, SAC [Sierra Access Coalition] believes that fuelwood gathering should be allowed on all existing roads, not just designated routes. Plumas residents rely on a cost-efficient source of heat for their homes, and they should not be restricted from cutting firewood for personal use. The removal of snags also reduces the fire hazard which is a benefit to forest health.

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Comment 95

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

3.3.3.2 Environmental Consequences
1A. Five trails were eliminated from consideration for designation because they are in serpentine soils. There are system roads on the Plumas that are in serpentine soils, and there are even roads that are surfaced with crushed serpentine rock, such as the road to Red Hill. These system roads are open to public and commercial use. SAC [Sierra Acces Coalition] fails to see how a single-track low use trail could be more of a health hazard than a full-width higher use road. 1B1. says "All the high clearance roads currently open to the public on the Plumas National Forest were determined to have minimal safety concerns and will be designated as open to all vehicles", which is not be a true statement if serpentine soils are considered. Justify why single-track trails being held to a higher standard than NFTS roads.

Response

Serpentine soils can produce asbestos dust that may cause health concerns. Five trails (5M11, 5M13, 8M11, 8M23 and 8M32) are entirely in serpentine soils. The presence of asbestos in serpentine soils and health risks to trail users has not been determined. The Pacific Southwest Region is developing guidelines for determining the presence of asbestos and the health risks to the public. The Plumas NF will follow the guidelines when they are available and implement mitigation measures required by the Region if health risks are found to be present. Potential mitigation measures are anticipated to include public notice of asbestos hazards, closure of portions of trails to the public, and seasonal closure of portions of trails to the public.

Comment 96

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Soil and Water Resources "Effects Analysis Methodology" section in Ch. 3

Page 88 3.5.6.2.1
The document states "126 route/stream crossings" were observed and "85 miles were rated "extreme" and "unmitigatable". However the DEIS doesn't contain documentation to support this. Did a qualified Engineer makes this determination, or was it determined by a hydrologist or biologist? This data must be displayed in the FEIS.

Response

Soil and water resource effect rating categories for proposed trails, as well as available mitigations, are described in the "Site Specific Analysis Indicators for Existing Unauthorized Routes" section of the Soil and Water Resources "Effects Analysis Methodology" section in Ch. 3. Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in appendices to the Soil and Water Resource Report. Detailed field survey information for specific routes is available from each PNF district by request. All routes rated as "High" or "Extreme" were field visited by a PNF hydrologist.

Comment 97

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Pages 90-91-92 all appear to have inaccurate mileages quoted.

Response

These mileages have been corrected.

Comment 98

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS project alternative maps and Appendix D of the Soil and Water Resource Report

Page 94 Table 22
Which roads are affected?

Response

No existing NFTS system roads are affected by any of the action alternatives. Differences in the motorized road and trail densities presented in Table 22 result from differences in the number of existing unauthorized routes proposed for addition to the NFTS under each project alternative. Locations of the proposed routes are shown in the alternative maps attached to the FEIS. Watershed analysis boundaries are presented in Appendix D of the Soil and Water Resource Report.

Comment 99

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Pages 96 and 100 appear to have inaccurate mileages quoted.

Response

The mileages of trails proposed for addition to the NFTS stated in section 3.5 for each alternative match the mileages presented in the chapter 2 description of alternatives.

Comment 100

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Throughout the process, SAC [Sierra Access Coalition] has told the Forest Service that Plumas County was developing an ordinance that would allow green sticker vehicles on county roads. SAC requested that the Forest Service consider this early in their route designation process and coordinate with the County, but this fact was disregarded.

Response

Recreation Use Maps will incorporate this information to help identify riding opportunities.

Comment 101

Action: Alternatives General (add, change, delete)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It is unclear how many miles of road will be dropped from each alternative. Each alternative states how many miles are proposed, but a total mileage of inventoried routes that are not going to be designated is not shown. The exact mileages for each alternative, for routes designated and for routes rejected, needs to be plainly displayed in the FEIS. There should also be a map for each alternative that displays which routes are being left undesignated.

Comment 102

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

In the DEIS analysis, access for fighting fire has not been considered. An analysis of this need must be provided in the FEIS.

Response

Fire personnel will be able to use any road, trail or unauthorized route they need for fires access.

Comment 103

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Visual Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Visual Resources
Page 62 .
Direct/indirect Effects of Visual Quality Objectives. Where is the supporting documentation?

Response

This information is based on trail location and Visual Quality Objectives found in the Plumas National Forest Land Management Plan.

Comment 104

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Water and Soil Resources
Contributed by Wayne Johannson, Retired USFS Soil Scientist

Page1 – 1.2 Background
It is a disingenuous statement to assert that OHV's are the primary culprit for the unplanned roads and trails that exist. While there may be some locations (primarily single track motorcycle trails) where that is true, the vast majority are legacy roads/trails from the extensive logging and mining history. Johannson was constantly alerting management to the defacto increase in the non-classified roads that were being left on the landscape after harvest operations. It was quite common to leave a temporary road on the landscape and designate it as closed with water bars and/ or a small barrier. Additionally, there are all the skid trails where no attempt was made to uncompact them and restore the productive capacity. The Forest Service is responsible for the vast majority of the nonsystem roads and skid trails that the OHVs have subsequently found and begun using. Whatever degree of compaction exists on the roads/trails being used by OHVs is a result from the logging operations not from the minuscule pounds per square inch (PSI) imparted by an OHV. To the extent that any locations are experiencing erosion or sedimentation problems the Forest Service should consider the source of the disturbance, overwhelmingly they been non-OHV vehicles. They were responsible for selecting or approving the vast majority of these locations during the timber harvest operations. They were also responsible to ensure that appropriate and necessary erosion control features were implemented. They are required to review these features for up to a year after installation to ensure their effectiveness.

The Forest Service needs to cross reference the inventoried unmanaged road and trail system that has been identified with maps of the prior timber sale operation if they believe this assertion is inaccurate. The Forest Service is also requested to produce documentation that they did their due diligence and checked off the effectiveness of the erosion control measures applied post harvest. The Forest Service has cast aspersions on the OHV community when the blame lies with them and their past practices.

Response

The origin of the proposed trails does not have a bearing on the condition of the proposed trail.

Comment 105

Action: Monitoring, Inventories

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 11 – 2.3.1 Monitoring
The Forest Service is requested to produce documentation of their past use of the deferred maintenance condition survey protocol. What roads and/or trails have actually been monitored over the last 20 years? The Forest Service past actions indicate whether proposed actions can reasonably be expected to be implemented.

The Forest Service is requested to produce the Travel Management Monitoring Plan that all action alternatives will adhere to. Without being able to evaluate that document the reader cannot make an informed analysis of the extent and degree that any or all action alternatives comply. The Forest Service is not ready to make an informed decision until this crucial plan is made available to the public for their review with the DEIS.

The Forest Service identifies that a "monitoring strategy" is important to develop. Why isn't it developed now? When will it be developed? The public should be involved with its development and implementation.

Response

We have developed a monitoring plan that can be found in Chapter 1 of the FEIS. We will work with the public to develop and implement a monitoring strategy once trails have been designated.

Comment 106

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 13 – 2.3.3 Mitigations for Soil and Water Resource Impacts
The Forest Service continues to blame the users for the condition of the trails yet the forms do not provide for identifying how the trails were generated. It would appear the Forest Service has some data about how trails were generated that they have not shared with the public. The Forest Service needs to provide the public with a listing of each trail segment and how the trail was generated and whether it was user-created or a legacy feature from past logging or mining.

Response

The origin of the proposed trails does not have a bearing on the condition of the proposed trail.

Comment 107

Action: Classification

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The Forest Service discussion of stream crossings identifies what a typical crossing mitigation would consist of, namely, a rocked ford. The Forest Service is being hypocritical in indicating a much higher standard they require for logging operations. Skid trails and temporary roads rarely impose this level of mitigation. It is common for logging to cross ephemeral or intermittent drainages without crossing structures. The standard protocol is to remove most of the material within the high water mark and water bar of either side of the crossing. Not all of the material is removed but it is flushed out later during the winter. Depending on the topography, the water bars can be up to 20 or more feet away. Most of these crossing do not receive any mulch to inhibit surface erosion into the channel. The Forest Service is indicating that armored dips are likely to be required where culverts exist. Again, this discussion is fraught with hypocrisy. There is no such standard applied to the system roads of the Forest. The Forest Service is indicating the OHV routes would be held to a much higher standard than they require of themselves and their contractors.

Response

Rock armor for proposed trail fords at stream crossings is a mitigation to keep trail surface and fill slope soils in place. Clarification has been added to the "Mitigations for Soil and Water Resource Impacts" section of Ch. 2 of the FEIS to state that native surface fords may be appropriate, depending upon soil type, for low gradient ephemeral streams. Unlike the skid trail and temporary road features used in timber management projects, the trails proposed for addition to the NFTS are presumed to be permanent facilities.

Comment 108

Action: Alternatives General (add, change, delete)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 14 - 2.3.4 Descriptions of the Alternatives
The listing of trails needs to include the origination of the trail segment i.e, legacy form logging, mining, user created, or some other source. What the Use Evaluation Field Form provides for is to characterize what type of vehicle could use the trail. It does not identify the specific width of the travel way. We [Sierra Access Coalition] are left to infer based on the vehicle type listing. With this perspective it appears segments listed in Table 1 as "All" came into existence as previously specified, from logging or mining operations. Those that are listed as less than 50" in width are likely legacy roads and skid trails that are been encroached upon by vegetation growing from the edges. Only the motorcycle or ATV can reasonably be attributed to a status of user created.

Those trail segments that were generated through Forest Service activities are the responsibility of the Forest Service to apply any necessary mitigation needed to bring the trail to a safe and environmentally sustainable condition. The Forest Service needs to acknowledge this responsibility and establish a time line for accomplishing it.

Response

The origin of the proposed trails does not have a bearing on the condition of the proposed trail. The vehicle type was determined by the type of vehicle using the trail. In some cases a motorcycle trail is on an abandoned skid trail with 16" trees growing in the road bed.

Comment 109

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Page 53 – 3.3.3.1 Affected Environment/Environmental Consequences
The Forest Service acknowledges that the road system is not being maintained as in the past and that the use is much less given the greatly reduced logging activity. The Forest Service needs to re-analyze the Level III roads in light of the significant reduction in usage. The purpose is to display what the historic use level was when the Level III status was assigned versus current usage. The Forest needs to disclose to the public what criteria are used in determining a roads classification level.

Response

Analysis of all system roads to determine whether there should be additions, reductions or re-classifications was not required for this decision. A few specific ML 3 roads were analyzed for reclassification in consideration of OHV recreation in a manner consistent with Regional direction. Nothing in this decision prohibits future consideration of status changes to system roads.

Comment 110

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

It is understood that the Travel Management Plan is not intended to analyze the existing transportation system. But in this case, the Forest Service needs to incorporate that analysis with the FEIS, given the highly significant effect it has on the overall network of trails being considered for OHV use. This is paramount to the quality of the riding experience, namely, being able to ride for extended periods without having it interrupted by segments of

Level III that would be off limits. Extended riding on Level III roads is not the objective. They are a means to an end. Namely, to efficiently access the narrower, lower traffic roads that give a more enhanced rider experience.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 111

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Forest Service makes reference to safety issues pertaining to "roughly graded" versus "passenger car roads". They then site the California Vehicle Code (CVC) as "allowing operation of non-highway vehicles on roughly graded roads". This statement is true but incomplete and misleading. The CVC allows non-highway vehicles use on any forest service road. The Forest Service has been deceptive in their biased presentation of the CVC. Johannson talked with Officer Stone of the local California Highway Patrol (CHP) on February 25, 2009. He indicated that he had been requested to provide the Plumas NF with data on accidents occurring on forest service roads. He didn't recall the time frame that the data covered, but there were about 100 accidents. Johannson then asked if the data was subdivided by car on car versus car on OHV. He stated he wasn't asked that and then recalled that the vast majority were car/truck on car/truck and a small amount were car/truck on OHV and almost no car/truck on motorcycle. The Forest Service must request the CHP database - Statewide Intergraded Traffic Reporting System (SWITRS) to be accessed again and data collected and put into context to display how the accidents relate to vehicle type and road type (roughly graded versus Level III). The Forest Service then needs to display this data. This will either support or refute whether there is any correlation to those accidents and potential for future accidents involving OHV on Level III roads.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3,4 and 5 Roads.

In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

Comment 112

Action: Traffic control and safety

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

The Forest Service has manipulated the presentation in section 1B2 to convey the impression that there is increased risk with motorized mixed use (MMU) on Level III roads. The only comment that is presented is to state that the 11.3 miles of Level III roads they've selected have no accident history and very few safety concerns. The Forest Service offers no data on the other 392 miles of Level III roads. The Forest Service needs to disclose if the information the CHP has collected from the approximately 100 accidents was the principle basis for their position

the MMU is a hazard on Level III roads. If it was, then they have not done their due diligence to fully analyze the data and have erroneously misinterpreted a data summary.

The Forest Service's attempt to restrict OHV access to Level III roads for safety reasons is without merit and cannot be supported by the data. Maximum access to Level III roads is paramount to the quality of the riding experience, namely being able to ride for extended periods. With only limited use of Level III roads (11.3 miles) the quality and enjoyment drops precipitously as many outings would be constrained as the numerous intersections with Level III roads would break up the trip continuity. Increased loading and unloading and extensive trailing on poorly maintained (full of wash boards) Level III would be required. This is a fatal flaw.

Strong support can be made for position that Level III roads pose no greater safety concerns than other roads. In fact they are probably safer. That's what prompted the Forest Service to build these roads to a higher standard. These roads have much greater travel width, straighter alignment and are generally on gentler grades. All this provides greater visibility to increase safety. ATVs and motorcycles are much smaller that passenger vehicles providing greater maneuverability and greatly reduced stopping distance. We suspect that the CHP database will show that most accidents occurred on narrow road segment when a curve was involved and sight distance was reduced.

The Forest Service should be willing to meet and discuss each Level III road segment and see if some common ground can be reached to provide for safety and optimum OHV trip continuity. It would be reasonable to reserve the right to impose seasonal closure to OHVs of some Level III segments when substantial increases in traffic can be expected, such as during a logging operation.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 113

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 56 – 3.3.3.3.1 Direct and indirect Effects
The statement "These routes would continue to cause resource damage and would need a certain amount of maintenance in order to continue to be usable" is not appropriate. It implies that all of the existing trails are in this condition. The Forest Service needs to quantify and specify which routes/trails this applies to. We maintain that the majority of the trails on the forest have no such condition, or no more than the adjoining system roads.

The use of the word "route" needs to be unilaterally replaced with "trails". You need to be consistent.

Response

The majority of proposed trails are in need of maintenance or mitigations in order to reduce resource concerns. Our system roads also require periodic maintenance.

Comment 114

Action: Methodology and Assumptions

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Ch 1, Public Involvement, Ch. 2, Alternatives Considered in Detail

Page 70 – 3.5.3 Effects Analysis Methodology
The record states that 739 miles of 1109 miles of existing routes were not surveyed for existing condition. This

statement leaves the reader to wonder why such an abbreviated amount of survey was conducted. How can an informed decision be made when such a limited scope of the candidate pool was considered? The Forest went to extensive efforts to solicit input from the public to identify potential trails for inclusion in the OHV plan. To what end; for 2/3 of the trails to be left on the cutting room floor with no consideration in the proposal?

What basis did the Forest use to drop these segments? The Forest has also made a unilateral decision to preclude trail segments under a certain length from being considered in the proposal. This big brother mentality presupposes that you know best what use (woodcutting perhaps?) or enjoyment the public may get from accessing these trails. As long as a one of these trail segment is not causing resource damage or if and until the Forest does an analysis that results in a decision to close and/or obliterate a trail, it should be left to the discretion of the public whether to use a trail or not.

These are significant flaws that seriously and arbitrarily impact the OHV experience and would not allow for an informed decision.

Response

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1). The initial proposal consisted of known routes used by the public, including destinations, loops, and spur routes to fishing access and favorite dispersed camping sites. The initial proposal avoided routes on private land with no right of way, routes where motorized use would conflict with existing uses, and routes with measurable resource impacts. Information meetings were held in Quincy, Portola, and Oroville in April. Followup workshops were held in each city during May.

Alternative 3 responds to non-motorized recreation interest in “Citizen Inventoried Roadless Areas (CIRAs)” proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 115

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 74 – 3.5.3.2.2 Water Resources
“For the approximately 50-200 feet of a well designed road or trail surface … that approaches the stream channel on both sides of the crossing, there is really no other place for the surface-generated sediment to go but into the stream channel.” This is a self serving statement that is not a universal truth.

Response

Clarification has been added to the "The Field Survey Protocol: Potential Impacts, Assumptions and Limitations" section of the Soil and Water Resources section of Ch. 3. The statement applies to the segments of roads and trails between a stream crossing and the nearest surface or ditch cross-drain structure. The FEIS clarifies that some surface-generated erosion may be buffered by streamside vegetation.

Comment 116

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Pages 74-76
Photos are of system roads, and the damage has been repaired. These are irrelevant (non-OHV impacts) Photos of the problems that are being discussed in the DEIS need to be included, rather than the irrelevant photos.

Comment 117

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 75 – 3.5.3.2.2 Water Resources
"Active restoration or obliteration of one or more unauthorized routes or areas is not part of any of this project's action alternatives". Emphasis added. The Forest displays benign neglect when it cavalierly discounts the ongoing resource impacts occurring from some unclassified trails. The Forest needs to identify which trails segments they have identified in this condition and whether the trail is a legacy from past Forest operations or is user created. We [Sierra Access Coalition] found it enlightening that your photographs of resource damage were all on system roads. Couldn't find any from the user created trails? The Forest would have no credibility as a land steward if it pursues such a short term approach. If not now, when? It appears the Plumas' land ethic is satisfied with letting nature take its course. So the basic philosophy of the Forest is resource damage isn't so bad as long as no one sees it and the public is not contributing to it in some minor way. The Forest Service seems to have forgotten a part of their motto "Caring for the Land". The Forest could appear to care, if it identified that funding options will be sought out and corrective action taken when funds are available.

Response

Adverse soil and water resource effects that cannot be mitigated within the scope of this FEIS were determined for a portion of the routes proposed for addition to the NFTS (the routes rated "Extreme" in Appendix A). Obliteration of these routes is not currently proposed because subsequent NEPA analysis by other resource specialists (e.g. heritage, botany) will be necessary to determine effects of the obliteration actions. Section 3.XXXX clarifies that future PNF projects will investigate and prioritize existing routes that need active restoration to ameliorate soil and water impacts. Funds sources, both inside and outside the USFS, will be utilized to perform NEPA planning and on-the-ground implementation of needed obliteration.

Comment 118

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: "Field survey methodology" section of the "Effects Analysis Methodology" section in Ch. 3, Soil and Water Resources seciton

Page 76 - 3.5.3.2.2 Water Resources
"Sediment production from motor vehicle use of native-surfaced NFTS routes is typically increased by higher levels of traffic ..."

This broad generalization only has merit when there is a direct convenience from the road surface to a channel. For this to be true there would be direct visual evidence that an observer could see where material removed from a trail/ road surface traveled to a channel where it becomes sediment. The vast majority of soil moved off of the trail/road travels only a short distance and is trapped and confined by the duff and litter. It's not sediment if it doesn't enter a channel. The intent seems to mislead the public rather than educated them.

Response

The FEIS Ch. 3 section for Soil and Water Resources recognizes that road- and trail-generated erosion is characterized as sediment only when it enters a stream course. Appendices F, G, and H of the Soil and Water Resource Report note proposed trails that were determined to have delivery of route-generated sediment. Those determinations were based on direct visual observations during field surveys for each route. See the "Field survey methodology" section of the "Effects Analysis Methodology" section in Ch. 3 and the Field Data Collection Form in Appendix C of the Soil and Water Resource Report.

Comment 119

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.6.2

Page 81
The addition of routes as trails would not increase the % of land disturbed. The routes all exist, so there is no net increase. Has this been considered in the analysis?

Response

As described in section 3.5.6.2, for Alternative 2 – and for all action alternatives (2-5) - the cumulative effect to watershed condition at the analysis watershed scale would be beneficial as a result of passive recovery of unauthorized routes currently open to motorized traffic, mitigations performed on routes added to the NFTS, and protection of areas that are currently untracked. The analysis recognizes that the addition of unauthorized routes to the NFTS as trails would not increase the percentage of land disturbed and would not increase adverse effects to soil and water resources over existing levels because these routes already exist on the landscape. Unlike alternatives 3, 4 and 5, the analysis states that adverse soil and water effects would exist at a site-specific scale for alternative 2 because 51 miles of trail proposed are rated "Extreme," meaning that those adverse effects cannot be feasibly mitigated and would persist in the future.

Comment 120

Action: Cumulative/Combined Effects

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 82 – 3.5.4.1.4 Cumulative Effects of the Three Alternative Components as a Whole
We [Sierra Access Coalition] concur with the statement that "the vast majority of the soil and water resource effects of the unauthorized routes and areas that are proposed for addition to the NFTS have already occurred since these routes currently exist on the landscape". This statement would likely apply equally too many of the 739 miles not surveyed. And many of those miles may not have any ongoing resource damage.

Comment 121

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 88
"Non-motorized traffic" following prohibition would delay or prevent recovery. Does this mean that bicycles, hiking, and equestrian uses would prevent recovery?

Response

Thank you for recognizing this typo. The statement was intended to refer to "Motorized traffic" and has been corrected for the FEIS.

Comment 122

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendices F, G, and H of the Soil and Water Resource Report

Page 88
126 route/stream crossings were observed to either be currently diverting stream flow down the route surface or having the potential to divert stream flow." Which routes are these, where is the documentation?

Response

The routes with observed diversion potential are noted in the summary of field survey information and soil and

water effects determinations presented in Appendices F, G, and H of the Soil and Water Resource Report.

Comment 123

Action: Cumulative/Combined Effects

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Sections 3.XXXX and 3.XXXXX

Page 91 – 3.5.6.2.2 Cumulative Effects
The third paragraph is completely erroneous. The assertion is made that by discontinuing use of some trail segments, that the road density is decreased. Do you really think that by stopping use the road would no longer exists? This is voodoo analysis.

Response

The cumulative watershed effects indicator for this project analysis, stated in the "Analysis Methodology for Each Project Alternative as a Whole" section of Ch. 3 for Soil and Water Resources, is the density of proposed trails and roads "open to motorized traffic." Passive recovery, over a 25-30 year timeframe, of soil cover and vegetative productivity of the routes not added to the NFTS is assumed, with concurrent reductions in erosion and sedimentation. The effects of passive recovery are described in the Alternative 2 direct/indirect effects analysis for prohibition of cross-country travel. This section recognizes that, without active restoration or obliteration, some of the soil and water effects of the non-proposed routes will persist. However, the trail and road density indicator provides a relative comparison of the passive recovery effect that would occur under each alternative.

Comment 124

Action: Cumulative/Combined Effects

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The Forest Service maintains that prohibition of cross-country traffic on areas currently untracked would improve long-term watershed condition and risk of cumulative effects would decrease. If you believe this always happens then how can you allow any equipment off of designated skid trails? Since the Forest has no such prohibition for logging operations, they are again being disingenuous and using Pollyanna statements to mislead the public. Not doing something rarely results in an improvement. It can maintain the status quo.

Does the Forest Service maintain that installing walking trails such as those at Lakes Basin or the Pacific Crest Trail damage long-term watershed condition and risk of cumulative effects? We think not.

Response

The direct/indirect effects analysis for Alternative 1 (no-action) states that, without a prohibition of cross-country travel, soil and water impacts "could" occur on areas that are currently untracked. The analyses for Alternative 2 and the other action alternatives state that such impacts would be prevented. Clarification has been added to the FEIS that such impacts are more likely on steep slopes.

Comment 125

Action: Cumulative/Combined Effects

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The Forest Service generalizes that any cross-country traffic is likely to result in erosion and disturbance of the A-horizon as well as modification of surface runoff timing and magnitude due to vehicle track ruts on currently untracked areas. This assumes facts not in evidence. We challenge the Forest Service to document this assertion. We [Sierra Access Coalition] maintain an OHV can make many passes cross-country without doing any of the things you claim. I'm not saying it can't happen. We can easily envision a motorcycle being operated on slope with sufficient speed to generate some surface disturbance. But, a 4-wheeled OHV moving through the woods at low speeds (generally 5 miles per hour) would generally leave no detectable trace. Those preparing this document apparently have little to no personnel knowledge of riding an OHV.

Response

The direct/indirect effects analysis for Alternative 1 (no-action) states that, without a prohibition of cross-country travel, soil and water impacts "could" occur on areas that are currently untracked. One case where such impacts did occur was on a hillside with jeep traffic near Smith Lake on the Mount Hough Ranger District, a site that was rehabilitated in 2006 using restoration grant funds from the California State Off-Highway Motor Vehicle Recreation Division. The analyses for Alternative 2 and the other action alternatives state that such impacts would be prevented. Clarification has been added to section 3.5.6.2 of the FEIS that such impacts are more likely to occur on steep slopes.

Comment 126

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 100 - 3.5.6.5.1 Direct and Indirect Effects
The Forest Service continues to refer to the legacy roads and trails from its past operations as unclassifed. The Forest Service authorized most of them and needs to catalog the source of the trails and give credit where credit is due when it refers to these trails. Passive re-vegetation on compacted roads and trails from logging operations is not the panacea it is purported to be. This concept came into vogue when Johannson was working on the Plumas in the early 1980's when the NEPA process required a hydrologist to come up with a way to characterize long term effects of logging operations. It was a best guess as to what amount of time would be needed for sufficient vegetative recovery to occur to lower the cumulative effects to near background. It has never been tested or verified. Just as the threshold value for percent of a watershed in equivalent roaded acres (ERA) has never been monitored or tested. They have become imbedded into Forest Service methodology from which the cumulative effects methodology is based on. These are numbers games without any scientific basis.

The ironic part to this situation is that without the national direction to prohibit cross-country traffic the vast majority of these so called unclassified trails would continue to be what they have always been - legacy temporary roads and skid trails from previously authorized Forest Service logging operations that became popular routes with OHV's for various reasons. The miles that have been identified are not the complete story. They only represent the ones you found or the public brought to your attention. There is still a vast array of old temporary roads and skid trails present of the landscape that haven't been identified. Johannson has seen them while doing due diligence performing the field review of proposed timber sales.

Response

These routes are not part of our transportation system.

Comment 127

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas National Forest should provide the reader with the personal experience of the preparers regarding OHV activities. We [Sierra Access Coalition] believe the key participants in the preparation of this document have little to no active riding credentials.

Response

The riding credentials of team members have no relevance in determining resource impacts.

Comment 128

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The letter dated December 18, 2008 File Code 1950-3 that accompanied the release of the DEIS states that Alternative 2 is the "Proposed Alternative". However, page I states that Alternative is the preferred alternative. This is very misleading and confusing.

Comment 129

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendices F, G and H of the Soil and Water Resource Report and alternative maps attached to the FEIS

Water Resource – there is no explanation regarding the location of roads the water resource decision affects. Small maps in the back of the book don't help (page 422,423)

Response

Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in Appendices F, G and H of the Soil and Water Resource Report. Detailed maps of trails proposed for each alternative are available on-line or (upon request) on compact disc.

Comment 130

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Page v. Several tables in the DEIS have tables, such on this page, that have numerical ratings. What was the basis and criteria for the numerical ratings and where is the documentation to support the numbers? Without background on the rating system, these numbers appear to be opinions rather than based on science. The FEIS needs to show this data.

Response

In many cases, specialist ranked the criteria based on their analysis on a 1-5 system without doing a quantitative analysis.

Comment 131

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Page 32 3.1.3 says unmanaged OHV use has cause resource damage. Where is the documentation? Or is this an assumption?

Response

Resource damage is discussed throughout the resource sections in Chapter 3. Specific routes with existing adverse effects to resources are shown in Appendix A.

Comment 132

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Pgs 32-33 3.1.4 #1-2-3-6-7-9-10-13 We [Sierra Access Coalition] question the assumptions. Where is the documentation to support these assumptions?

Response

Some of these assumptions in the beginning of Chapter 3 were written to make it clear to the reader exactly how the National Forest Transportation system is managed. The also clarify the scope of the proposed action and the analysis. Assumptions that are summarizing direction from handbooks and regulations cite these as appropriate. Where assumptions are merely spelling out the logic behind the scope of the proposed action and analysis, no citations to direction are made.

Comment 133

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1] Comments to specific trailsroutes believed not to have been analyzed
submitted by Sierra Access Coalition
Date: 3/15/2009

Response

This is a list of every inventoried route.

Comment 134

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2] Map of Alternative 6, proposed by Sierra Access Coalition

Response

This is a list of all unauthoized routes.

Comment 135

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 3] Discrimination - Rehabilitation Act Information
Rehabilitation Act of 1973, as amended
Title: Laws and Regulations
submitted by Sierra Access Coalition

Comment 136

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 4] Letter to Randy Moore from Department of California Highway Patrol regarding Route Classifications
Date: December 19, 2007

Comment 137

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 5] Letter from Sierrra Access Coalition to request an extension of comment period
Date: January 24, 2009

Response

The comment period was extended 30 days.

Comment 138

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 6] Letter from Sierra Access Coalition requesting missing data and extension of comment period.
Dated: March 5, 2009

Response

Missing data was provided. The comment period was extended 30 days.

Letter 2

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

In the Draft Environmental Impact Statement (EIS) for Motorized Travel on the Plumas National Forest, you propose adding 364 miles of unauthorized roads and motorized trails to your current transportation system. This action seems surprising to me considering that the Forest is unable to properly maintain the 4,137 miles of roads and 123 miles of motorized trails currently existing on the forest.

Comment 2

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The current proposal focuses too much on analyzing the potential impacts of designating new user-created routes and not enough on assessing the environmental and social impacts of existing National Forest Transportation System (NFTS) routes.

Response

This EIS deals only with Part B of the Travel Management Rule, designating new trails and not analyzing existing roads and trails.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

The current transportation system continues to allow motor vehicle use in ecologically and socially important roadless areas, in proposed Wild and Scenic River corridors, in habitat of sensitive wildlife species, and in rare Montane Meadow habitat.

Response

The rehabilitation of system roads and trails and user-created routes will need to have a separate environmental analysis with public involvement before any ground disturbing activities are implemented.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Draft EIS is wholly inadequate in following the regulations established for travel management and in addressing the environmental impacts associated with the current and proposed transportation systems. The Plumas National Forest has not: a) identified the minimum road system needed for safe and efficient travel and for protection of National Forest System lands; b) identified the roads under their jurisdiction that are no longer needed to meet Forest other uses; and c) completed a science-based analysis of the existing National Forest Transportation System to inform these decisions.

Response

This EIS deals only with Part B of the Travel Management Rule, designating new trails and not analyzing existing roads and trails.

Comment 5

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Because you have not completed a science-based Travel Analysis and included an Alternative that considers road closures on the existing NFTS, I encourage you to select Alternative 3, which prohibits cross-country travel but

does not add new roads or motorized trails to the current unsustainable NFTS.

Response

Your comment has been noted.

Letter 3

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Protect our lands and species. Save our forests from destruction, please protect the Plumas National Forest.

Letter 4

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

I'm asking that you dispose of the plan to add new roads to the Plumas National Forest. Whatever has been done

here is certainly not adequate for the sensitive areas you are designating for motor use which will greatly impact certain species.

Response

Your comment has been noted.

Comment 2

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I encourage you to select Alternative 3, which prohibits cross-country travel but does not add new roads or motorized trails to the current unsustainable NFTS.

Response

Your comment has been noted.

Comment 3

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

It is time to put the Bush administration's wild plan of trying to destroy as much of the forest and the environment as possible to rest and start doing what we were intended to do which is protect not ruin the U.S. Forests.

Response

Your comment has been noted.

Letter 5

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative Energy Sources

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Why encourage even more gas consumption? We're already dangerously reliant on foreign countries for gas. Instead, encourage people to find inexpensive ways to enjoy nature.

Comment 2

Action: Roads and Trails (incl. access general)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The forest can't handle more roads. Roads cause habitat fragmentation, severely limiting the effective population of species and ultimately leading to population collapse.

Response

Habitat Fragmentation is discussed in Chapter 3, Terrestrial Wildlife Section, see effects to carnivores, late seral habitat and old forest emphasis areas.

Letter 6

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I urge you to restrict and control, rather than enlarge, the road network in this forest that's open to OHVs—they are polluting, noisy, disrupting both humans and animals as well as downright destructive (erosion, etc.).

Response

Your comment has been noted.

Comment 2

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Why should a single off-roader have the right to spoil the experience for dozens or more of quiet visitors—as well as cause destruction far beyond the time of visit?

Response

Your comment has been noted.

Comment 3

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please help us balance out how this forest (and others like it) can be used for recreation by everyone!

Response

Your comment has been noted.

Letter 7

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	Mailing list only or nothing to code (do not attach a flag)

Letter 8

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It has been proposed that 364 miles of roads and "motorized trails" be added to the Plumas National Forest. Just what we need - more $$ to maintain roads! And more liability issues when the roaring idiots crash and burn.

Comment 2

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

The Forest should be a place of tranquility; where humans (and animals) can breathe and relax, and think w/o the screaming of internal-combustion demons.

Comment 3

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

If any changes are to be made, they should be in the direction of removing roads and replacing them with footpaths.

Comment 4

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Start paying attention to the destruction wrought to our environment: the air, water, and soil - that is steadily decaying due to the toxic fumes generated by the obsession with engines. They can drone on, forever and ever, but nothing will completely silence the sad and mourning spirits which long to know nature as a friend - not a "roadway" to trample.

Letter 9

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Plumas National Forest has already too many roads and motorized trails. Please leave the rest of the forest to those people and those animals that enjoy a quiet and beautiful place to visit.

Response

Your comment has been noted.

Letter 10

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Use of Public Comment (vote, majority opinion, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Why do the rights of those want to ride their loud, polluting vehicles thru the forest more important than those whose use it all year round? These "right" really come from humanities ability to kill anything at any time it wants to. If bears had a-bombs and knew how to use them. Your issue of these off road vehicles wouldn't exist. Prove me wrong. Let the planet live.

Response

Routes need population centers were carefully reviewed to minimize noise and pollution in those areas.

Letter 11

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested

Request Information	None

Comment 1

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

No more roads in the Plumas National Forest!

Letter 12

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 4 (NR protection and CIRCAs)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Upon reviewing all 5 alternatives in detail and their associated environmental consequences, we [Greenville Rancheria] believe that Alternative 4 offers a reasonable balance between recreation opportunity and resource impacts. Although the Tribe would traditionally choose Alternative 3 as it offers the highest level of protection to cultural and natural resources, we also understand that the National Forest is a precious commodity that many people visit to seek its solitude. If too many areas are restricted, we believe that unauthorized cross country travel would occur and areas would be damaged as a result. However, we also believe that every effort must be taken to limit the effects of such recreational activities and therefore feel that Alternative 5 does not offer enough protection to cultural and natural resources.

Response

Your comment has been noted.

Comment 2

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Cultural Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

This area has been utilized by the Maidu and other Natives for thousands of years and holds traditional and cultural significance to many. We [Greenville Rancheria] appreciate the protection measures outlined in Alternative 4 which does not allow motorized access to important traditional areas.

Comment 3

Action: Methodology and Assumptions

Resource(s): Cultural Resources

Disposition: Resolved: Other (SEE RESPONSE)

Although the number of Native American sites is limited, we [Greenville Rancheria] are concerned with the method of listing sites and their associated route ID as many looters are capable of taking great measures to find and desecrate these areas. We understand that site effects must be analyzed and reported, however there must be a solution to keep these areas confidential.

Response

The DEIS does not disclose specific site location information. While the analysis does include minimal information regarding site characteristics (i.e. historic or prehistoric), it does not identify the nature, extent or location of cultural resources within the project area. The information that was provided was necessary to allow the public to effectively participate in the environmental analysis process.

Letter 13

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe Alternative 6 as proposed by the Sierra Access Coalition is the best plan. I have seen resource damage in the forest and I think it is very important to address this problem.

Response

Your comment has been noted.

Comment 2

Action: Roads and Trails (incl. access general)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Fire access roads are important to me because the Rich Fire was fairly close to my neighborhood, 8 miles away.

Response

No roads are effected by this proposal.

Letter 14

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

As you well know there is a lot of concern with the USFS and the PNF Travel Management Environmental Analysis. I am overly concerned that this is just a beginning to effectively continue to keep the public off of the National Forests. Other regulations have been introduced in the House of Representatives on January 29, 2009. This is specifically HR699, by Nick Rahall, called the Hardrock Mining and Reclamation Act of 2009. If this act passes, as written it would completely shut down the mining industry in the U.S. as we know it today. There are regulations that are in this bill that would also make it almost impossible for miners to operate in the National Forests. It would only add to the problems that I am concerned about, and that is access to the National Forests that, we the people, pay taxes for and to have access to.

Response

The Plumas National Forest Public Motorized Travel Management Plan designates motorized trails. Mining claimants can receive permission to travel to mining claims from District Rangers.

Comment 2

Action: Volunteer Groups and Partnerships

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

I know there are problems in certain areas with erosion problems, but these areas can be taken care of in a systematic way if the USFS wants too. The public I am sure would be more than willing to help restore some of these areas to useable conditions. Many 4-wheel drive clubs currently are involved in these activities.

Response

Designated trails with High resource effect ratings (see Appendix A) will need to be maintained and have mitigations in place prior to being placed on the Motor Vehicle Use Map for vehicle use. It is expected that most of this work will be accomplished with volunteers and grant money.

Comment 3

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Currently the USFS is looking at alternative 5. The Sierra Access Coalition has proposed an alternative 6 for the USFS to look at and consider in its final review of the proposals. The Plumas County Board of Supervisors also does not like the current Alternative 5 and have sent a letter stating a number of concerns they have with the USFS plan. I concur with their assessment, as well as with the Sierra Access Coalitions findings concerning your proposed alternative 5 option.

Response

Your comment has been noted.

Comment 4

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

What I see happening is something like this. I am a Plumas County resident and have been all my life. If I had 20 acres of land, pay my taxes on that property, then the county comes along and says that I could only use 1 acre of my land for use. That is what seems to be happening on our National Forest Lands. We pay taxes to the government, and then get told we can't cut wood unless it meets certain ridiculous rules and now you are proposing to keep us out of more areas of the forests. We would be better off if a private entity was managing our forests, a very renewable resource.

Response

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links. New routes to benefit these networks may be analyzed in the future, but are beyond the scope of the existing routes analyzed by this effort.

Comment 5

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

With the many problems that have arisen, starting with the Environmental Protection laws that have come to play, air and water quality rules, all play into keeping the people off the forest lands. If the trends continue, the forests will continue to be subject to higher fire danger than currently exists. We should be learning from the positive results that have come from the QLG work that has taken place in a number of spots on the forest.

Response

Fire fighters can use any route that is available. Once they are decommissioned or overgrown, they would need to use their dozer to gain access to these areas.

Comment 6

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I hope you seriously consider reworking this draft plan as there many problems with the current alternatives. As a member of the Sierra Access Coalition I fully support their findings and support their alternative 6. I also concur with the Plumas County Board of Supervisors letter that was sent to Alice Carlton, our current Forest Supervisor. They have found a number of problems with the proposed alternative 5 option that is currently being considered for adoption.

Response

Your comment has been noted.

Comment 7

Action: Timber Harvest/Fuel Management

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

If the forests continue to be managed as they are, the only thing that is going to happen is that we will see many more thousands of acres go up in smoke due to huge forest fires. We have seen this happen all across our nation, especially the past five years. The tax dollars alone that could be derived from proper forest management, with proper logging, etc., could probably meet all the financial needs that we would have in managing our National Forests in a proper way. Plumas County has lost more than 40 saw mills since W.W.II of various sizes. Now we are in danger of loosing Sierra Pacific, some due to the housing market, but a lot due to the fact that they cannot get enough trees from our forests to sustain the needs they have to stay in operation. We have seen our school district go from one of the wealthiest districts in the state to one of the poorest, because we have lost the money from the forest receipts. Toss out the lost jobs over the years and it's no wonder that Plumas County is in dire financial chaos. Look at what the budget is for the Forest Service. How much of that budget goes into fire fighting? Recently it's been over a billion dollars a year, and that doesn't take into consideration CAI Fire, Indian Reservation fire fighting costs, and other local agencies that become involved.

Response

Your comment has been noted.

Comment 8

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Forest Service needs to drastically change the way the forests are currently being managed. The current proposed alternative 5 is a very poor attempt at managing the forest roads and trails.

Response

Your comment has been noted.

Letter 15

Attributes

Attribute	Value

Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Monitoring, Inventories

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Mike Lomas and Mark Tande volunteered to GPS routes and provide the data to the Forest Service to use in the OVH Inventory Process. We used Forest Service equipment which was voluntarily offered to them at a public meeting. We inventoried as many OHV routes, including single track, quad and some vehicle roads, as possible within a 2-3 year period (2005-2007). It took 8 hours to inventory 12 miles times, 2 people riding – the first person identified the trail; the second person had the GPS unit to map the trail. This shows how much work was put into this inventory. The data that was inventoried was submitted to the Mt. Hough Ranger District weekly for processing to be included in the Plumas NF Route Designation Process (RDP).

At a public meeting at the Plumas-Sierra Fairgrounds, the Forest Service displayed maps of routes that the public had submitted to be included in the RDP. It was very disheartening to discover how much of the data that we collected and submitted was not on the maps.

I talked to Forest Service personnel regarding the missing data and I was told to resubmit the data or remap the miles again. I remapped routes in the Oakland Camp/Cascades area and in the Meadow Valley area. This data was resubmitted to the Mt. Hough District again in March of 2007. By this time the "First Cut" maps had been produced and a small amount of my data was included.

I still want these routes to be included in the Final Environmental Impact Statement for the Plumas NF Public Motorized Travel Management Plan.

Routes less than ½ [a] mile were thrown out of the inventory initially, before being considered as part of loops. I want these routes to be included in the Final Environmental Impact Statement for the Plumas NF Public Motorized Travel Management Plan as approved routes.

Response

Chapter 2 has been modified to explain how the trail selection process occurred. Many of these inventoried routes were not included because of noise and dust concerns for adjacent landowners and lack of required private access. The Plumas National Forest asked the public to validate the need for trails less and 1/2 mile long and considered those responses in determining which trails to survey.

Comment 2

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Oakland Camp/Cascades Area

I inventoried the trails in this area specifically for year-round use. It is the only area available to residents of American Valley that is not on private land.

I want the Four Corners play Area to include a Staging Area for the Oakland Camp/Cascades Area, especially in winter months.

The Four Corners Play Area is designed for use by kids that are 8-12 years old and restricted to a small area.

Including a Staging Area here makes this Area more usable for all ages and types of OHV use year-long.

I inquired at the Fairgrounds public meeting about three areas – Oakland Camp/Cascades, Claremont and Meadow Valley. The Forest Service comments to the Oakland Camp/Cascades area were "we have other plans for that area." "Mountain Bikes"; "these uses don't mix".

I was informed by some mountain bike user that the Oakland Camp/Cascades Area is being developed as a mountain bike only area. That information made me suspicious as to why my GPS data was "lost".

The Oakland Camp/Cascades area is my favorite area to ride my motorcycle in the winter. When I was made aware of the Forest Service plan for the mountain bike area, I noticed the trail from Four Corners to Oakland Camp, which crosses the railroad tracks, was excluded from OHV use, but was included in the proposed mountain bike area. I had a meeting with Forest personnel regarding this proposal and was told that he didn't believe motorcycles were riding in the area because he had not seen any evidence of this type of use.

I was told that mountain bikes riders are an "organized group" and deserve this area. I feel that implies that OHV users are not organized and don't deserve to have access to this area, since the Forest Service has not "seen" any OHV use in this area.

I often use this area and I inventoried this area and provided the data to the Forest Service.

I was accused of making trails by forest personnel. I told them there wasn't time to inventory the trails that were already there – I didn't have time to make any new ones. Why is the Forest Service including connecting trail construction when we can't even get the routes included that we've proposed.

I want this are to be included for OHV use in the Final Environmental Statement and the Plumas NF Transportation Management Plan as an authorized route.

I feel the effort that is being applied to this mountain bike area at Oakland Camp/Cascades should be applied to the whole project.

Response

Chapter 2 has been modified to explain how the trail selection process occurred. These inventoried routes were not included because of noise and dust concerns for adjacent landowners and lack of required private access.

Comment 3

Action: Other/Unspecified

Resource(s): Legal and Regulatory (Incl. Process), Site Specific

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Meadow Valley – Gopher Hill Area

When initial maps were checked at the fairgrounds public meeting, data was missing for this area.

We went back to re-inventory this area, as requested by the Forest Service. We discovered most of the trails had been destroyed by a dozer rake even where there was no logging activity. All the destroyed trails should have been left alone thru the OHV process.

I want all the trails that were inventoried and existing in the Meadow Valley/Gopher Hill/Snake Lake Areas to be included in the Final Environmental Statement and the Plumas NF Transportation Management Plan as authorized routes.

Response

Chapter 2 has been modified to explain how the trail selection process occurred. Many of the Meadow Valley trails were used by the timber sale contractor and decommissioned after use. These inventoried routes were not included because of noise and dust concerns of adjacent landowners and lack of required private access.

Comment 4

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Play Areas

The only designated play areas for OHV are the existing one at Four Corners and a proposed one Sly Creek. This is not an adequate number of play areas for the existing use. These areas are essential for younger riders who have to be taken to an area to ride. The Four Corners area is not large enough and doesn't incorporate enough trails for riders of all skills. The area needs to be larger and include more diversity for all riders' skill levels.

I would like to propose another play area in the Meadow Valley area. This is the area referred to as "The Spaghetti Bowl". This area encompasses the southwest side of the Meadow Valley/Bucks Lake Road, between the Deanes Valley Road and Gopher Hill/Snake Lake Road intersection.

Response

The Four Corners area has many noxious weed and private property concerns that would make it difficult to expand. The Meadow Valley play area was considered and determined to be inappropriate due to noise and dust concerns.

Letter 16

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Disabled and Elderly Forest Users: This variable has not been included when retaining and removing routes and has not been analyzed in the draft EIS. This issues needs to be addressed in the DEIS.

"It is Forest Service policy to provide a diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation rol and land capability (FSM 2353.02(2))." Aging and handicapped users may not be able to ride an OHV, ATV, etc. and may be limited to a specific type of motorized vehicle (i.e. wheelchair or scooter). The diversity of trail types is imperative to people with these limitations. The draft EIS fails to include aging and handicapped users as a variable for training and/or deleting routes, and therefore has not adequately analyzed the diversity of routes that each alternative.

Response

The Rehabilitation Act of 1973, which was amended by the Americans with Disabilities Act of 1990, set the direction that no person with a disability can be denied participation in a Federal program that is available to all other people solely because of their disability. This Travel Management project is designed to provide reasonable access for public wheeled motor vehicles and the decision to be made would apply to all Forest visitors. As stated in the preamble to the national Travel Management regulations, there is no requirement to allow people with disabilities to use motor vehicles on road or trails otherwise closed to motor vehicles since such an exemption could fundamentally change the travel management program (Fed Reg V.70, No. 216, p 68285). The analysis of effects in Chapter 3, Recreation section and Table 1 in Chapter 2 display the impacts of restricting public motor vehicle access, including access by people with disabilities, so that the Forest Supervisor can make an informed decision. The effects analysis does recognize that those alternatives with greater restrictions on public wheeled motor vehicle use of roads and trails impact persons with disabilities to a greater extent than those alternatives with fewer restrictions, particularly for those routes which provide access to recreation opportunities such as dispersed camping, streamside access, etc.

Comment 2

Action: Use of Public Comment (vote, majority opinion, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I submitted a comment letter during the scoping period and provided comments to the proposed action. I requested that certain routes be included in the site specific analysis. I also brought forward several comments that were not adequately addressed. The FS never addressed all of my comments and need to also address these comments. There is no way of tracking them though with all the route number changes. That there is no way for you to provide a reference to which roads and where on earth they are because of the numbering convention that they decided to use, and then they renumbered everything with no [way] to track each road.

Response

Trails were renumbered to be consistent with our road and non motorized trail numbering system. Many of the original routes had multiple numbers and needed to be consolidated into one trail number. In the project record, we have a table that shows the original route numbers and their new numbers.

Comment 3

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 4, Section 1.3 Purpose and need, item 1. The draft EIS states "There is a need for regulation of unmanaged motor vehicle travel by the public. The proliferation of unplanned, unauthorized, non-sustainable roads, trails and areas created by cross-country travel adversely impacts the environment."

I disagree with the draft EIS. Could a large amount of routes, say upwards of 90 percent have been created by Forest Service land management activities? Labeling all of these routes as "unauthorized user created routes" is an error, misleads the public, and rationalizes the unilateral decisions by the FS to minimize the number of routes analyzed in detail. What evidence do the FS have to prove that these routes did not exist on the landscape prior to any OHV use? The routes need to be correctly inventoried so that each route can be correctly analyzed for environmental impacts. Further, a road that was created by FS land management activities can be correctly addressed as a ML1, Temp roads, 299 spec roads are not unauthorized roads and need to be analyzed for future resource management needs as well and fire prevention and suppression.

Response

The majority of inventoried routes were old temporary roads. It was determined at the time of the timber sale that these roads should not become permanent system roads and should be put to bed. Future timber sale and fire access is not affected by designating motorized trails.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 386, Appendix A: A List of Routes and Resource Impacts, Effects Determinations Code E: The defection of (hidden the fine print) these rating (L, M, H, E) are incomplete and need to be fully addressed for each route. "E: Extreme resources affects that are outside normal (Page 385 and 386) mitigation requiring additional environmental analysis. This RDP [Route Designation Process] is the proper document to do the needed additional environmental analysis. I want all these addressed in these Final EIS documents. Extreme is not being applied consistently. Impacts have a general listing and some mitigation impacts were listed. Then many routes are listed as Cultural: Evaluate Sites. The EIS document needs to have Cultural concerns Evaluated [for] all sites and fully address and list all cultural issues. Watershed: Site-specific mitigations may include additional…The EIS document needs to have all watershed concerns evaluated and fully address and list all cultural issues. Routes are included in an alternative, they have been included in the Draft EIS analysis; but deleting a route because it was outside normal mitigation and not disclosing why, (i.e. cost, land allocation restrictions, etc.) is in error. Include it in the DEIS. There is no later times or budget or process [to] designate for additional environmental analysis. A former Plumas National Forest Supervisor, James (Jim) Pena said, "if egregious road damage exists the road should be closed immediately." Now some roads are supposedly so egregious (identified as extreme in the DEIS) bad they are being eliminated from this EIS and the OHV site specific analysis. Why has the FS changed their position and standards regarding egregious and/or extreme roads?

Response

The trails that have Extreme resource effects require additional NEPA because new trail constructed is need to resolve the extreme resource concern. No new trail construction can be proposed with this project. If a trail needs new construction, additional NEPA will be required at the District Ranger level.

Comment 5

Action: Classification

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Special Interest Areas (SIA)

Page 279, section 3.8, subsection 3.8.6.2.2 – Special Interest areas (SIAs)
SIAs have been in proposed status for more than 20 years. As stated in section 3.8.6.2.2, the reference to Forest Service Manual (FSM) 2372.4 also addresses develo9pment occupancy and public use in SIAs. The FSM or LMP reference does not address "Proposed SIAs", meaning there are no standards and guidelines developed or in effect that directly speak to "proposed SIAs". After reviewing the Botanical field reports, there were no roads and trails disturbing special features. The FSM states "Roads and trails will be kept at a minimum for public enjoyment." The irretrievable impacts have been felt on all roads, routes, and trails that currently exist. These roads, routes and trails should remain there and continue to be used.

Response

Your comment has been noted.

Comment 6

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

A severe error is the route to Brady's Camp is missing from detailed analysis in this Draft EIS. The FS road going into Brady's Camp does not show on any of the Alternative's maps in the DEIS. This is a well-established camp that OHV users have used for decades. This route should continue to be authorized for OHV use.

Routes 11M13B and C need to be included in this draft EIS and analysis so that the user can transition into route 11M13 and loop back down to route 11M13A an FS Road 28N19A. Where route 11M13 leaves FS Road 28N19A, the entire remainder of route 11M13 should then be closed or decommissioned. By eliminating routes 11M13B and C the concept of "destination", the purpose of having this OHV loop, has been lost. Be removing routes 11M13C and B it appears the FS is only removing these routes because of geographical "redundancy" or proposed routes, and to keep the amount of routes analyzed to a minimum. See attached Brady's Camp camps.

Response

The Brady's Campground symbol allows use of that area. Changes to Alternative 5 have been made incorporating these suggestions.

Comment 7

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

How could these routes, roads, and campgrounds [routes 11M13B and C and Brady's Camp] have "extreme resource effects that are outside normal mitigation requiring additional analysis?" First, these routes are only in a proposed SIA. "Proposed SIAs' are not part of the LMP and any special restrictions applied to routes within proposed SIAs need to be removed for this analysis.

Other proposals include things like the Citizens Inventory Roadless areas. A proposed SIA is not different than a CIRA [Citizens Inventoried Roadless Areas]. There are only proposals until they are found to have significance and value that warrants a decision to give them special designation.

The Pacific Southwest Region (R5) Geographical Information Systems (GIS) data does not include propose SIAs. (http://www.fs.fe.us/r5/rsl/clearinghose/gis-download.shtml#download) If the Regional Office is not recognizing proposed SAs as restricted areas, why is the PNF? This is only another example of numerous oversights that flow this project and is another way to minimize the effort to analyze routes. These areas are not in the LMP and should not be implemented.

Response

Appendix A of the DEIS has been amended. Routes 11M13B and 11M13C are both included in Alternatives 4 and 5.

Comment 8

Action: Goals and Objectives/LRMP Consistency

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Direction from the FSM [Forest Service Manual] regarding SIAs [Special Interest Areas]
2372. – Development, Occupancy, and Public Use
1. Place campgrounds or other overnight recreation developments outside of special areas whenever possible.
2. Locate roads, trails, sanitary facilities, picnic grounds, and parking spaces without disturbing the special features of the established area.
3. Allow no resorts or other high-impact special uses within the area unless needed for public enjoyment of the principal features of the area.
4. Keep developments such as roads, trails, and other facilities to the minimum necessary for public enjoyment of the area.
5. Build no roads or other improvements on or through geological formations unless it is the only alternative to meet management objectives for the area.
6. Encourage public use and enjoyment of each administratively designated special area up to the level that will ensure protection of the special values for which the area was established.
7. Provide interpretive services to enhance visitor's understanding and appreciation of the area's special features.
8. Allow other occupancy and use of the area's resources to the extent they neither interfere with the primary values for which the area was established nor negatively affect the visitor's experience.
2372.5 - Boundaries and Maps
Prepare an official boundary prescription and map for each special area. Follow the same procedures and standards used for wilderness boundary descriptions found in FSH 2309.19, Wilderness Management Handbook.

Response

Your comment has been noted.

Comment 9

Action: Classification

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 324, section 3.8.10, subsection 3.8.10.2.1 – Special Interest Areas.
Brady's Camp includes all of Pine Creek Valley. The DEIS analyzed and recommended that these proposed SIA [Special Interest Area] will prevail over OHV routes that overlap with proposed SIAs. The OHV routes should be left in place and not removed because they overlap with a proposed SIA.

Response

Your comment has been noted.

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.2

The statement, "Proposed trails that have well-established use within these areas. Still have the potential to significant degrade or disturb" is used extensively in the DEIS. Why is this statement made so often, when all roads, trails, and routes have the potential to degrade or disturb; especially roads, trails, and routes that are used by mixed vehicle types [and] especially since the majority of the routes analyzed have been in place for more than 10 years?

Response

Existing unauthorized routes are typically old temporary roads used in past timber sales, old firelines, or user-created routes. Unlike existing NFTS roads and trails, none of the routes proposed for addition to the NFTS under this FEIS were analyzed for long-term and cumulative resource effects at the time the route was created. Alternatives 2, 4 and 5 propose that some of these routes be adopted as permanent facilities on the NFTS. See section 3.5.2. Best Management Practice 4-7 requires that, for Off-Highway Vehicle use development, PNF must identify areas or routes where OHV use could cause degradation of water quality; identify appropriate mitigations and controls; and restrict OHV use to designated routes.

Comment 11

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Coppoletta, M 2008. Biological Evaluation p. 3.

The "within 100 feet standard" is not a realistic and applicable distance to use for all Botanical standards. Where did it come from? All analyses state concludes with having "the potential to affect", but these proposed routes have been in place for more than 30 years. Removal of routes is not justified because of a potential risk when history shows that, in most cases, the risk was minimal. The majorities of these routes are created as temporary roads and skid trails, and were placed built to specific standards.

Response

Section 3.8.3.1 on p. 266 of the DEIS disclose the effects analysis methodology. "In general, direct effects are most likely to occur within a zone of 30 feet on either side of the trail due to the need for parking and pulling off to allow for another vehicle to pass. Indirect effects are most likely to occur within a zone of 100 feet or an additional 70 feet beyond the 30-foot zone."

Comment 12

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, 3.8.8.1.2

Page 226, section 3.8.3.1
Alternative 1 was only used to analyze cumulative effects to rare species. Why were other botanical resources not analyzed?

Response

Cumulative effects to other botanical resources are addressed in section 3.8.8.1.2. Table 116 on p. 290 of the DEIS provides the number of miles of proposted trails within the existing and proposed special interest areas.

Comment 13

Action: Goals and Objectives/LRMP Consistency

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 332, section 3.8.10.6
States that Alternative 1 does not comply with the Forest Plan. The Forest Plan states that this is an open forest. How does this not comply with the LMP [Land Management Plan]? Is there a document that has amended the Forest Plan? If so, what and where is it?

Response

The Forest Plan requires protection of sensitive plans which Alternative 1 does not accomplished.

Comment 14

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Alice Carlton said that there would not be restrictions on dispersed camping because she believed that the public has the right to use campsites that they have used for years. This has been repeated at many meetings.
Page 5, section 1.3, item 2
"Without adding them [[short spurs]] to the NFTS and designating them in a MVUM [Motor Vehicle Use Map], the regulatory changes noted above would make continued use of such routes illegal and would preclude public access to many dispersed recreation activities." I am not clear what item 2 is saying which is making it difficult to comment.

Response

The Plumas National Forest will not restrict use of dispersed campsite off system roads and trails. See section 2.4.2 Designate Areas for Dispersed Camping.

Comment 15

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 27, section 4.4.2
E, section 1.3, item 2. Be the DEIS. This needs to be corrected to agree with Forest Supervisor direction that there is not going to be restrictions on dispersed camping.

Response

The Plumas National Forest will not restrict use of dispersed campsite off system roads and trails. See section 2.4.2 Designate Areas for Dispersed Camping.

Comment 16

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 27, section 2.4.1
Said routes were dropped because the public was "not interested in designating." This is not a valid reason to drop routes. With this said, it is clear why my original comments were not addressed. Routes have been dropped that show use by OHV users, and users did "ask" for these routes to be included. How did they make this determination? Forest personnel said they cannot afford to keep these. They dropped a lot of routes in the first cut, and then said if people really wanted them they should resubmit them. Is that how they figured nobody wanted them because they didn't submit them twice?

Response

Most of the inventoried routes were mapped by Forest Service employees and contractors. The Public was asked to submit those routes that were important motorized trails, and many of these inventoried routes were not submitted by the Public.

Comment 17

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

ML [Maintenance Level] 3, 4 Roads
Modoc National Forest EIS allows use of ML 3 roads. Records show no safety issues or patterns between OHV and licensed vehicles. Feather River Publishing Newspaper article 'From Where I Stand' by Sylvia Mulligan clearly shows these facts that are not being addressed.
These all have been used safely for decades. With this record, OHV vehicles need to be allowed on all roads. FS has stated safety as their only issue. Then the numbers show this to a safe place to ride. Why not allow this? Level 3 roads are built to a higher standard than level 2 roads. This makes them safest than level 2 roads. Level 3 roads are wider, have less steep grades and tight curves (better alignment) that makes them inherently safer than level 2 roads. So it should be easy to do an engineering analysis that shows ML 3 roads are safer than ML 2.

Response

We are following Regional Office direction and will review additional level 3 roads in the future.

Comment 18

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Following is an excerpt from the PNF http://www.fs.fed.us/r5/plumas/publications/pdfs/ohv/OHV_vol1-issue1.pdf. The PNF Off-Highway Vehicle Route Designation clearly identifies the type of vehicles that are considered as OHVs. Vehicles such as mini-bikes, amphibious vehicles, motorcycles, go-carts, motorized trail bikes and dune buggies. This excerpt and public notice does not include vehicles used for dispersed camping, woodcutting, and wildlife game retrieval. References in section 1.3, item 2 is not clear when compared to the vehicles listed on the webpage! I cannot comment on what the webpage says. What the draft EIS should say is "vehicles used for dispersed camping, woodcutting, and wildlife game retrieval are not bound by OHV restrictions. This still available and is still miss leading and yes is not the DEIS but FS is still addressing the public with this.

Response

The FEIS designates motorized trails and areas for vehicles greater than 50" wide, less than 50" wide and singletrack. The motor vehicle use map (MVUM) will document where the public can use motorized vehicles by vehicle type and season.

Comment 19

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe that the FS has decided to drop inventoried and well established) routes and expected the public to submit the routes on "green sheets", GPS the routes for the FS, and then not include the routes for arbitrary reasons. This is wrong; the RDP needs to include all routes and let the environmental analysis process reduce the number of routes within a logical alternative. The fact is that the public is and demands to continue using these routes is enough evidence that they should be designated.

Response

Not every route could be surveyed with our current budget and personnel constraints. The highest priority routes should have been brought forward to be surveyed. If some of those were missed, they will need to be propose at a later date at the District Ranger level.

Comment 20

Action: Scope/Scale of analysis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 9, section 1.8.2, item 2 – Non-significant Issues – Mountain bikes.
"This issue is outside of the scope of the purpose and need." It appears to me that proposed routes have been removed from the RDP [Route Designation Process] for the sole purpose to develop (proposed) mountain bike trails. All routes needs to be included in the RDP. There is no safety patters on these routes to support the need for restriction of either bikes or motorized vehicles. There are the same issues with a horse on these trails. There is no evidence to support the claim that there is a user conflict. Just perceived is not acceptable.

Response

Several routes were recommended that the most appropriate use was non-motorized due to user conflict. Other routes were not considered due to noise and dust concerns. Some routes were not considered because private easements are required.

Comment 21

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

R.S. 2477
There are also numerous other RS 2477 roads throughout the Plumas National Forest that need to be inventoried and listed. I would like the FEIS to identified these routes, and include them in the RDP because they are RS 2477 road class therefore they are protected from closure. Being that Archeology data is protected data I have no way to see and was not stated as being analyzed. This needs to be analyzed and documented in the FEIS.

Response

We are not aware on any RS 2477 routes that have been missed.

Comment 22

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Summer Use OHV Map was revised in 2004 for the RDP [Route Designation Process]. Everything In this map should be brought forward and be incorporated with the RDP. An analysis was done and these routes were determined to be the best OHV routes on the Plumas. So they should all be carried forward into the proposed action. This map was included in the temporary motorized vehicles restrictions package given out to the public. Summer OHV map should be used as your starting point. It has been used as part of your OHV summer program. See attached Plumas National Forest Off-highway Vehicle Map Summer Use.

Response

The Summer Use OHV Map utilized roads that are currently unavailable for Green Sticker Vehicles because they are considered Public Highways; therefore the Map will need to be revised. All of the roads and trails on the Summer Use OHV Map will be available for use on the motor vehicle use map.

Comment 23

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

P 12 2.3.2 Provide clear, consistent and adequate signs that identify dead-end routes leading to an stopping at rivers, streams, and meadows. Most of these are dispersed camping sites and must be allowed to provide this non-impact use.

Response

These signs would be posted at the end of trails to keep vehicles out of these sensitive areas.

Comment 24

Action: Outreach/Education

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Forest Supervisor has said that all roads proposed for decommissioning will be posted on the ground for 1 year prior to implementation. This is a good start; FS guidelines need to be followed and the route number shall be posted on the SOPA [Schedule of Proposed Action] webpage to inform the public.
http://www.fs.fed.us/sopa/forest-level.php?110511
http://www.fs.fed.us/sopa/components/sopa-dscr.shtml#whatis

Response

No routes are proposed for decommissioning with this project.

Comment 25

Action: Protecive Designation for Resources (e.g., Class 1 Air, AIZ, ROS, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Wind testing towers and equipment are being allowed in non-motorized areas. Vehicle Restrictions Areas needs to be consistently applied and removed from the RDP [Route Designation Process]. Diamond Mountain has some of the best potential for wind producing electricity. Big business roams freely in these areas and OH is restricted.

Response

This is an existing motorized trail.

Comment 26

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

11M12, 11M10 and 11M12A needs to be included. "Non-existent" and a tree across the road is not an acceptable reason to remove the routes. In fact, FSH 2309.18, 2.32a, Ex. 01 states that a certain number o down logs on trails are desirable. This is a greater than 10 foot wide road. I was on these routes two times this past fall and yesterday (3/14/09). See attached map.

Response

11M10 and 11M11 have been added to Alternatives 4 and 5. 11M12 is an existing motorized trail.

Comment 27

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Big Picture
This RDP [Route Designation Process] is flawed by not looking at the big picture of how the National Forest is to be used/regulated.
Mountain bikes were included in the RDP [Route Designation Process] early on and now are excluded from this analysis. I question that decision because now it appears to me that the FS has dropped routes for these other uses. You want to expand much other use such as hiking trails. The college is expanding "horse only" trails. Now you are also dropping much desired proposed OHV routes for "Bike only."

Response

Some trails are better suited for non-motorized use. Mountain bikes are not part of the Travel Management Rule.

Comment 28

Action: Multiple Use Emphasis

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Big Picture
This RDP [Route Designation Process] is flawed by not looking at the big picture of how the National Forest is to be used/regulated.
The Forest Service has changed from a multiple use forest to a "catered" single use of the land. This needs to be changed. As taxpayer/user "We all need to learn to play to get in the sand box." But it's not in your yard only and as a member of the public I have some say so in the rules." The FS needs to promote this multiple use.
LMP states this is an open forest, significantly over looked issue.

Response

Your comment has been noted.

Comment 29

Action: Mapping, GIS

Resource(s): Wetlands

Disposition: Resolved: Other (SEE RESPONSE)

GIS Stream Course Center Lines and Buffers are misused in the analysis in determining if a route is to be within a Riparian Conservation Area (RCA) and excluded from analyses. All proposed routes are GPS and mapped correctly. All stream course center lines and buffers are computer generated and have proven to be incorrectly represented of what is actually on the ground. RCA location is so poor it has all missed some routes as well as substantially over estimated inclusions and exclusions. This over estimates RCA's.
This data is unacceptable to use for NEPA Analysis and Implementation. This unreliable data must not be used to determine whether a route is included or excluded without first field verifying the center line of all streams.

Response

Existing GIS stream data is the best available scientific information for analyzing effects to stream and aquatic resources. When the stream layer, in particular perennial and intermittant streams, is overlaid with aerail photos, the stream layer provides an accurate location of stream courses. In addition, each route was field reviewed and

surveyed by Forest Hydrologists and that information was also used to verify and correlate the GIS data. Based on field review and analysis of aerial photos, it was determined by Forest Service resource specialists that the GIS stream course data appeared to be accurate for this level of NEPA analysis.

Comment 30

Action: Mapping, GIS

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.XXX and 3.XXX

P 77 #2
The FS must GPS field verify all the streams from perennial, intermittent, ephemeral and swale. Inventory need to include changes each steam class.

Response

Limitations to the stream and meadow GIS layers are described in section 3.5.4 under the analysis methodology for mileage of proposed trails in hydrologically sensitive areas. Despite these limitations, analysis of the GIS layers provides a good coarse evaluation of proposed trail location in relation to stream and wetland locations and is considered the best available scientific information available. That coarse evaluation was refined by field survey data. The full length of each proposed trail was field surveyed. Each stream crossing was located and evaluated and the stream class (perennial, intermittent or ephemeral) at each crossing was noted in the field. The proximity of each trail segment to the nearest waterbody was also noted (see the Field Data Collection Form in Appendix C of the Soil and Water Resource Report).

Comment 31

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Routes missed being inventoried have not been addressed. It has been said that "we know we did not get 100% inventory. We hope that we got 80%." 80% is not good enough and the remaining 20% needs to be addressed by inventorying and analyzing all routes. "You just cannot get them all in this time frame" as stated by forest personnel.
Routes that are inventoried but were not asked for by the public were eliminated. These eliminated routes need to be included and analyzed. There is not a list of the eliminated routes in the DEIS. This data needs to be displayed in the EIS.

Response

All routes are shown on the Alternative 1 map. Not every route could be surveyed with our current budget and personnel constraints. The highest priority routes should have been brought forward to be surveyed. If some of those were missed, they will need to be propose at a later date at the District Ranger level.

Comment 32

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

OHV needs to have the same status as big business. The example is 12M29 (East of Red Rock). It is an Unauthorized OHV Route that is needed by big business. They are permitted to operate in a semi-primitive area where OHV route has been excluded. This needs to comply with the LMP. Why are they allowed to operate in an excluded area when the public will not be allowed?

Response

12M29 is an existing motorized trail available to the public and will be shown on the motor vehicle use map.

Comment 33

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Woodcutting needs to be listed 2.4 Alternatives Considered, but Eliminated from Detailed Analysis.
It has been clearly stated that firewood retrieval is not part of the RDP [Route Designation Process] and 36CFR 261.50(E) allows:
-Pursuant o36 CFP 261.50(e) the following persons are exempt from this order. Any Federal, State, or…
-Persons with a permit from the Forest Service specifically authorizing the otherwise prohibited act or omission.

Currently, all wood permits have references to the final EIS for the PNF Public Motorized travel Management results.

This is in conflict with the DEIS. Firewood areas are the same areas being proposed to be eliminated from this DEIS.
In 2003, wood cutting restrictions were implemented to restrict wood cutting to anything that resembled a "Road". This was not a collaborative decision. Only dictated! Hundreds of existing roads are not analyzed for firewood retrieval.

Illegal woodcutting is on a major increase because of this RDP.

I have a current permit which allows me to cut firewood forest wide. But limiting me to the Forest System Roads for retrieval is not compatible with the limited availability of firewood and retrieving practice.

It has been said for 2 years b forest personnel that woodcutting policies are going to be put back to the Ranger Districts to manage. This will only have a small ad short term benefit t the firewood needs of the communities in and adjacent to the Plumas NF. This would be only a temporary fix and is short term for local community where there is a project that was able to provide a firewood product.

I feel, if chip markets are up or no projects = no firewood available from projects. Forest personnel have said at public meetings that each District will develop a firewood cutting policy that may allow wood cutting and retrieval. Mt. Hough RD has made only a few areas available to the people with those local areas of the decks. I was never notified of any of the areas. Personal firewood needs to be accessible to all areas.

Mt. Hough Ranger Districts small sales shop is proposing a salvage program that will harvest dead trees within 100 feet of all roads. This also has a direct effect on all wood cutting areas. They are currently planning areas that are low elevation and accessible, not only the same areas but the same products. The requirement to stay within 10 feet of all roads needs to be removed from the wood cutting permit. See included maps that will show the small sales planned activities.

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Comment 34

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

The Forest Service is competing with the firewood by thoroughly assessing these same areas for virtually the same product.

Saw and firewood shop have significantly increased over the last 5 years by 57% and 2008 has increases of 28% of the prior year alone. This clearly shows the need to remove all firewood permit constraints tied to the RDP [Route Designation Process]. This is just another example of the increasing needs to rely on firewood to reduce your heating cost and reducing the reliance [on] oil.

Response

Fire wood cutting is managed by the fire wood permit. Additional cutting areas can be opened by the District Ranger.

Comment 35

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like an analysis and justification of all areas closed to woodcutting that are designated on the woodcutting permit.

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Comment 36

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

FS is pushing to reduce the carbon footprint. Dead tree removal by the wood permit would contribute to reducing the carbon footprint. I would like to see an analysis of this carbon reduction if the wood cutting permit is linked to the RDP [Route Designation Process].

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger. Determining the carbon footprint of burning firewood is a complicated calculation dependent on many factors beyond the scope of this document.

Comment 37

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Attached document CY 2008 FS 2400-1 Permit Program Comparison Chart Plumas and Lassen National Forests again clearly demonstrates the Plumas NF inconsistent with adjacent NF and are unresponsive to the public needs. Permits off road vehicle use when actively cutting or gathering fuel wood.

Comment 38

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The President repeatedly said that everyone needs to do everything possible to reduce reliance on foreign oil. With firewood becoming increasingly scarce and the need to travel farther, the public will have to increase their use of heating oil.

Response

Your comment has been noted.

Comment 39

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The analysis needs to address the accumulation and risk of additional fuel loading, as well as additional carbon emissions being produced by these trees.

Response

It is believed that fuel wood cutting will not be significantly effected by the reduce amount of access. The public will find sufficient areas to meet their firewood needs.

Comment 40

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

There is no analysis of Christmas Tree activities.

Response

Christmas tree cutting is regulated by the Christmas tree permit.

Comment 41

Action: Multiple Use Emphasis

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

One must not forget that FS continually emphasize that FS designed in partnership with California Off-Highway Vehicle Commission as a partner. California Off-Highway Vehicle Commission provided funding and policy for the RDP [Route Designation Process].
Governor Arnold Schwarzenegger fired this commission because of their bias.
http://ww.signonsandiego.com/news/state20071016-9999-1n16offroad.html
This DEIS continues to show bis. Bias is an analysis is not acceptable.

Response

Your comment has been noted.

Letter 17

Attributes

Attribute	Value
Early Attention	None

Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 1 (No Action Alternative)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe all roads and trails on alternative 1 should be left open.

Response

Your comment has been noted.

Comment 2

Action: Construction and maintenance

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

If the money spent closing roads was spent on maintenance it would solve a lot of erosion problems.

Response

Money is spent to decommission routes causing resource damage. Not all routes are in locations where maintenance can reduce resource damage caused by the route.

Comment 3

Action: Disabled and elderly use

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Closing roads creates a lot of problems for senior citizens and the handicapped for enjoying the hills.

Response

Your comment has been noted.

Comment 4

Action: Disabled and elderly use

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

There should be a one time cross country allowed to retrieve game as it is the only way for seniors and handicapped to hunt without help.

Response

Seniors and disabled persons may receive a permit from the District Ranger allowing a one time cross country game retrieval allowance.

Comment 5

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Closing roads makes quick response to fires by ground impossible and as we all know quick control of fires is a must to stop major fires.

Response

Fire personnel will be able to use any road, trail or unauthorized route they need for fires access.

Comment 6

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Roads to all scenic things (Snake Trees, Champion Tree, Post pile and others) and high ridge tops for the views should be open.

Response

Routes to these areas need to be surveyed prior to being added to the trail system. Many of these routes are proposed for addition to the trail system.

Comment 7

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I think all class three gravel roads should be open except a few with high usage like the Frenchman lake recreation area.

Response

We are following Regional Direction of designation for Mixed Use Roads. Future analysis may identify addition roads for Mixed Use Designation.

Comment 8

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

13mo6 is a very desirable to ride.

Response

13M06 is included in Alternatives 2 and 5.

Comment 9

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

10m42 to Cooks Creek Campground is very good road for fishing and hunting and camping.

Response

10M42 is in Alternative 2 and has unmitigatable weed issues that dropped it from Alternative 5.

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

10m32 is a tie between Mt. Jura and Beardsly Grade and coulee be fixed with a couple of water bars.

Response

10M32 is included in Alternatives 2 and 5.

Comment 11

Action: Other/Unspecified

Resource(s): Visual Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

15m05 is a very scenic ride and a loop road.

Response

15M05 is included in Alternatives 2 and 5.

Comment 12

Action: Other/Unspecified

Resource(s): Visual Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

17m04 is a good loop road and very good scenery.

Response

17M04 is included in Alternatives 2 and 5.

Comment 13

Action: Other/Unspecified

Resource(s): Visual Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

13m31 and 13m31A on Pappose Peak are very good views.

Response

13M31 and 13M31A are included in Alternatives 2 and 5.

Comment 14

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

15m07 is a good trail and makes a lot of area on the east side easy to get to.

Response

15M07 is included in Alternatives 4 and 5.

Comment 15

Action: Other/Unspecified

Resource(s): Technical/Editorial, Site Specific

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

25N46X on the Clover Creek side of Mt. Ingles is on the map and it has never been completed and is not a thru road.

Response

Your comment has been noted.

Comment 16

Action: Other/Unspecified

Resource(s): Technical/Editorial, Site Specific

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

25N04 in Dixie Refuge should tie back to 25N34 as it is a good road and I am sure it is a mapping mistake.

Response

Your comment has been noted.

Comment 17

Action: Other/Unspecified

Resource(s): Technical/Editorial, Site Specific

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

T27N R13E Sections 31 and 36, T26N R13F Sections 1 and 6, 2733 and 26N40 are on "Travel Management DEIS" Map as "Existing NFS Roads – Open to all vehicles". Roads were decommissioned need to be removed.

Response

Your comment has been noted.

Letter 18

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas County Board of Supervisors appreciates the spirit of cooperation that the Plumas National Forest has shown in approaching the many policy issues where the National Forest and Plumas County have shared interests. With respect to the Motorized Travel Management Project, we [Plumas County Board of Supervisors] share you concern about protecting natural resources and water quality and ensuring motorized travel is appropriately managed. However, after reviewing the Draft Environmental Impact Statement (DEIS), we are concerned that the proposed project is premature in its presentation and lacks content that is necessary both to adequately inform a decision as to the best alternative and to implement a successful and appropriate travel management program.

Response

The Plumas National Forest Public Motorized Travel Management EIS is a project for designating OHV recreational trails and closing the forest to cross country travel. Local government has been encouraged to provide substantive comments that will improve the recreational experience of the public on the Plumas National Forest.

Comment 2

Action: Goals and Objectives/LRMP Consistency

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

While labeled a "project," the DEIS actually presents a comprehensive plan for travel management which effectively amends the Land and Resource Management Plan for the Plumas National Forest. As such an amendment, the National Forest Management Act requires that the plan provide for multiple use and be coordinated with the land and resource management planning of local government. (16 U.S.C. 1604).

Response

This FEIS will add motorized trail and areas. This does not require a amendment to the Plumas National Forest Land and Resource Management Plan.

Comment 3

Action: County or Municipal Laws, Policies, etc.

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS does not adequately address land use designations under the Plumas County General Plan. There should be a comprehensive review of existing forest roads, whether officially recognized or not, taking into consideration zoning of private property, the potential for future use, and likely future access needs. Many private parcels use Forest Service Roads for ingress and egress. In particular, the standards for Limited Opportunity Areas state that all developments shall at a minimum have legal access by means of Forest Service roads or private road easements. In addition, fire-safe requirements dictate that development in Limited Opportunity Areas shall have a minimum of two access routes for roadways over one mile. An analysis needs to be performed to determine if any private properties will be affected by the project closures.

Response

The Plumas National Forest manages 4200 mile of system roads that provide access to HFQLG projects. This EIS is not proposing any system road closures or decommissioning. The routes that have not been selected for OHV trails can be used for timber sale and fire access.

Comment 4

Action: County or Municipal Laws, Policies, etc.

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The County of Plumas has formally adopted the Herger-Feinstein Quincy Library Group Forest Recovery Act as a resource management plan. While the draft EIS acknowledges the pending HFQLG projects for purposes of considering cumulative effects, there is no analysis as to how the closure or elimination of existing roads may impact the feasibility of planned projects. Specifically, the EIS should compare the Forest-wide, landscape-scale DFPZ network of the Forest Health Pilot and HFQLG Pilot Project against a map of the Forest's proposed road closures and decommissioning. This comparison should be the basis for an EIS analysis and disclosure of any and all road closures potentially affecting access for forest treatments and for wildland fire suppression actions.

Response

Please identify any route that is needed for communities at risk so that we can work to improve evacuation access. We have worked with Plumas County to improve County Road 508 as an evacuation route for the Greenhorn Subdivision with the Empire Project.

Comment 5

Action: Adequacy of Studies (Best Available Science)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The travel management plan should address future fire suppression and forest management needs beyond the current scope of the HFQLG [Herger-Finstein Quincy Library Group] Pilot Project.

Response

The Plumas National Forest manages 4200 mile of system roads that provide access to HFQLG projects. This EIS is not proposing any system road closures or decommissioning. The routes that have not been selected for OHV trails

can be used for timber sale and fire access.

Comment 6

Action: County or Municipal Laws, Policies, etc.

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The County of Plumas has a Fire Plan that calls for identification or development of evacuation routes from communities at risk, particularly those communities that have only one primary access route. The travel management plan does not adequately consider the need for evacuation routes or whether existing roads that are proposed for decommissioning could provide evacuation routes themselves or serve as parts of new routes.

Response

Please identify any route that is needed for communities at risk so that we can work to improve evacuation access. We have worked with Plumas County to improve County Road 508 as an evacuation route for the Greenhorn Subdivision with the Empire Project.

Comment 7

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

In 36 CFR 212.51 (b), discretion is afforded to allow limited use of motor vehicles within a specified distance of designated routes for purposes of dispersed camping and hunting activities. This discretion should be exercised to allow long-established uses of the Plumas National Forest to continue in a reasonable manner.

Response

Dispersed camping will continue to be allowed on the Plumas National Forest in established camp sites when parked no more than a car length off a road or motorized trail. Cross country travel to retrieve big game will not be allowed.

Comment 8

Action: County or Municipal Laws, Policies, etc.

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS does not adequately coordinate uses between National Forest routes and the County road system or consider the opportunities for County roads to serve as connectors between National Forest routes for OHV use.

Response

As we develop user maps that make recommendation for OHV travel, we will utilize county roads as connectors. County roads will be shown as other public roads on our Motor Vehicle Use Map.

Comment 9

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

While specific mileage of all existing roads has not been provided, the travel management plan appears to propose that well over 1,000 miles of roads be "administratively abandoned." In consideration of this proposal, the following

is pertinent:

- No map has been made available that depicts only the locations of the roadways proposed for administrative abandonment. Without such a map, the public is unable to review the proposal in a meaningful way and be made aware of the scope of its impacts.
- The number of miles of roadway that will be administratively abandoned is not even stated in the "Proposed Action" or the "Significant Issues" sections of the "Summary of the Draft Environmental Impact Statement" at Pages iii-v of the DEIS document.
- The fact that such roadways have been constructed in the past is evidence that they have been needed for various purposes. There is no correlating analysis stating the known, suggested, or unknown purposes for which the roadways to be abandoned were originally constructed, or whether or not those purposes are deemed to be no longer relevant, or how this conclusion was drawn.
- The DEIS does not address the fact that existing roadways that may serve as access to future timber sale areas, or other areas involving the use of natural resources, should be preserved. By discontinuing roadways under the proposed plan, future use will require repair or reconstruction with new cost and the potential for additional environmental impacts.
- Existing roadways may be needed to serve as access during future fire fighting efforts. The DEIS fails to adequately address this very important safety issue.
- The existence of a "short" stub roadway is not, in itself, sufficient reason for administrative discontinuance of a roadway, regardless of how the roadway was created.
- Instead of permanently closing roads that need a limited scope of improvements, such roads could be designated on a special list with the understanding that work would be undertaken as funds or volunteer help are available and thereafter the entire road could be added to the inventory.
- Any roadway that is administratively discontinued as a result of the travel management plan is subject to being scheduled for physical obliteration without a subsequent road-specific public hearing.
- Any existing roadway that is not presently experiencing erosion should remain open for public use.

Response

A. Alternative 1 map shows all the routes inventoried. Compare against each alternative one can determine which ones are not proposed for addition to our trail system.
B. Thanks for your comment. We will include this in the FEIS. Administratively abandoned miles are 745 miles in Alternative 2, 1090 miles in Alternative 3, 968 miles in Alternative 4 and 839 miles in Alternative 5.
C. Many of these routes were temporary roads and skid trails that were not adequately decommissioned after use.
D. Many of these routes were temporary roads and skid trails that would be available for timber sale use in the future.
E. Fire fighters can use any route that is available. Once they are decommissioned our overgrown they would need to use their dozer to gain access to these areas.
F. The trails we are designating are intended for recreation use and therefore should provide some sort of recreational experience.
G. With Alternative 5, we are designating trails that will require mitigation prior to being placed on the Motor Vehicle Use Map. The routes that were surveyed that had an extreme rating require a reroute that was not surveyed and is therefore outside the scope of this EIS.
H. Any route that is not designated will require additional NEPA prior to decommissioning. In all cases the public will have another chance to propose additional routes to be designated as OHV trails.
I. Erosion is not the only reason why a route was not proposed as an OHV trail.

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS has not addressed how the Plumas National Forest will respond to future County revision of the zoning maps that pertain to developable areas.

Response

The Plumas National Forest will respond to revised zoning maps once they are received from the county. Our Public Service Staffs can help you with the process necessary to address access needs.

Comment 11

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS fails to assure the public that the roadway system mapping associated with any subsequent decision will be comprehensive as well as user friendly.

Response

The Plumas National Forest is at the counties disposal to provide a comprehensive and user friendly mapping system. We are bound by a national protocol for our Motor Vehicle Use Map but intend to produce a OHV summer users guide by ranger district that will show all OHV routes and suggest different loop opportunities.

Letter 19

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Planning Process:

The decisions to be made are flawed in one significant way. The decision related to Mixed Use implies that Level 3 and better roads are currently closed to mixed use and the analysis reviews the possibility of allowing use on some level 3 or better roads. Plumas National Forest Practices and History of Planning do not support this perspective. The following are a few examples of where the Plumas National Forest has directed non-street legal use to level 3 or higher roads:

- Year after year, the Plumas NF has posted fire restrictions prohibiting motorized use off of NFS system roads. (Some times referenced as "established roads" or "existing roads"). No effort was ever made to explain that non-street legal vehicles were prohibited on any class of road.
- Field recreation and law enforcement staff often directed OHV users to trips that involved OHV use on Level 3 or better standard roads.
- Prior OHV planning and OHV route designation efforts often used the level 3 and sometimes level 4 roads to link segments of OHV routes to create longer distance riding opportunities and loops that allowed for a quality riding experience. This accommodated use without creating parallel routes and additional road density concerns.
- Early OHV maps clearly indicated that OHV use was permissive on level 2 roads and made no mention of prohibitions of use on higher standard roads.
- California Highway Patrol recanted their ill advised position about OHV use on higher standard roads. The Tahoe National Forest never pursued implementation of the former CHP position.
- In respect to the large number of visitors witnessed by Forest LEO or Forest Officers, very few individuals were ever cited for OHV use on Level 3 or better roads. Essentially none were cited on native surface or even gravel roads—most of the small numbers who were cited were cited for use on a paved road or a county road.

The issue addressed here is that the impact to the OHV user experience and, in turn, the associated cumulative impacts are understated by this fault. The impacts are far more serious than presented.q

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads

maintained for passenger vehicle use to roads defined as “highways” under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

Comment 2

Action: Seasonal Closures

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Seasonal Closures:

I whole heartedly support road and route seasonal closure for not only reasons of soil, and perhaps animal, protection but also for protecting the investments in the travel surface. All too often the roads/routes sustain summer long traffic to be thrashed by a few users who travel on the roads too early or too late. The Christmas Tree Program on the Forest is a major contributor to this wet road damage. Unfortunately, agency representatives often contribute to this damage as the engage in early or late season activities like burning and law enforcement.

I encourage seasonal closures based on road conditions rather than fixed dates. My concerns rest with the loss of flexibility associated with a fixed set of closure dates. In some years the date will be too son leading to a waste of riding opportunities. In other years the date will be too late permitting unacceptable damage to the road/trails and the resources they access. Both have a common effect: lack of credibility. It may seem easier and cost effective to print signs and guides with fixed dates but it will not be easier or cost effective if the public rejects the closures by being non-supportive because the fixed dates did not reflect the condition of the specific year in question. The education opportunity is available to accomplish the goal of closure of wet roads/routes if the closure has credibility.

In lieu of fixed dates, I recommend you use a process similar to the annual fire closures which are based on some assessment of the fire risk and hazard. You could display your variables (soil wetness, time since wetting rain, percent of road showing signs of being wet etc) and allowing a professional assessment be made for each area as to when to open and when to close.

Your system must be credible to be effective. Fixed dates can only be credible by accident (Mother Nature says your right this year but smirks at how often you will be wrong.)

Response

A legal opinion from the Office of General Council was used to form Regional policy that dates would be used to establish closure seasons. Dates define the most consistent criteria that can be enforced on the basis of the Motor Vehicle Use Map. Other considerations for using dates, from the standpoint of feasibility, include the personnel and resources required to assess soil and weather conditions on an ongoing basis and timelines to prepare, publish and inform Forest Orders, that are likley to exhibit variance across the Forest topography. The Forest has sought to minimize closure seasons on the basis of typical annual conditions, however, it is understood that circumstances within any given year may allow or require changes to season length by Forest Order, once this decision is implemented.

Comment 3

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

This Travel Management Plan needs to disclose the impact of prohibiting [multiple] use.

Response

The Plumas NF Public Motorized Travel Management Plan prohibits motorized cross country travel through designation of routes and vehicle authorizations, as required by the Travel Management Rule, 36 CFR parts 212, 251, 261 and 295. The decision does not prohibit motorized vehicle use or any other Forest activity. In complying with national law, as stated in the Travel Management Rule, the Forest is not obligated to backtrack and analyze determinations already made during development of the law, i.e., effect of OHV regulation on multiple use.

Comment 4

Action: Multiple Use Emphasis

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

I'll present my professional opinion about the values of mixed use which are outlined below:

Systems for Travel: Nowhere on the Plumas National Forest is their extensive network of road/trails that will accommodate long distance riding unless the vehicle under consideration is street legal. Without a system of adequate length and quality, the Forest has little hope of successfully managing OHV use. Lack of success will be apparent in very low compliance, continued route pioneering, and resulting impacts to the resources. The two opportunities to have a quality system on the Forest are to connect existing short segments of roads/routes with Level 3 or better roads or to connect those same segments by constructing new routes/trails that parallel the Level 3 or better roads. The latter choice might result in a safer and better quality experience for OHV users but comes with an investment/maintenance cost, environmental workload commitment, and probable road density issues that might be significant in some areas. But default – it appears your stuck with a system that continues to depend on mixed use.

Response

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links. New routes to benefit these networks may be analyzed in the future, but are beyond the scope of the existing routes analyzed by this effort.

Comment 5

Action: Multiple Use Emphasis

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

I'll present my professional opinion about the values of mixed use which are outlined below:

CHP Involvement: The CHP letter of January 2005 did raise un-necessary alarm about Level 3 and unpaved level 4 roads as being "Highways" and therefore being regulated by the CA Vehicle Code. Fortunately, the Plumas NF took little stock in that ill advised letter and made no effort to change the mixed us on those roads.

The CHP letter of December 19, 2007 corrects and reverses the January 2005 letter. This corrections supports continued mixed use of the Level 3 and unpaved Level 4 roads as meeting the "roughly graded trails and roads (Section 38001 VC)" criteria. The Forest can use this official position as part of the documentation that a decision to continue to allow mixed use of all level 3 roads is a rational decision allowing full protection of the decision maker under their discretionary function defense.

Of course Regional Forest Randy Moore shot himself and each of his Forest Supervisors in the foot on January 13, 2009 memo making it difficult for the line officers to make good decisions on mixed use.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads.

Comment 6

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

I'll present my professional opinion about the values of mixed use which are outlined below:

Environmental Protection: The strongest argument for continued mixed use of Level 3 and higher standard roads is based on the opportunity to route traffic to those roads rather than to create parallel routes or to have a system failure that would stimulate violations and possibly promote additional route pioneering due to customer dissatisfaction with the system.

Response

The decision to restrict OHV use on Level 3 and higher roads is on the basis of public safety rather than environmental protection. The presumption that safety restrictions will automatically result in illegal activity is not a sound basis to disregard considerations of public safety.

Comment 7

Action: Traffic control and safety

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

I'll present my professional opinion about the values of mixed use which are outlined below:

Realistic Maintenance: Many of the roads get very little surface maintenance except for short periods of time when they are being used for log haul. The balance of the time, most of these roads are rough and are being driven slower than design speeds because of the impacts to the street legal vehicles (beats the snot out of them). As such, the risk of collision with an oncoming OHV is probably lower than if those roads were currently maintained.

Response

Maintenance levels are determined by intended use and structure of the road template and surface. Maintenance levels are not adjusted on the basis of short term maintenance needs. Where decisions are made to reconstruct road surface and template characteristics in consideration of changing traffic needs, roads may be reclassified to different maintenance levels.

Comment 8

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I'll present my professional opinion about the values of mixed use which are outlined below:

Maintenance Downgrade: The Plumas NF has done a great job of surfacing an alternative to this mixed use question. Downgrading the maintenance standard, along with realizing the realistic actual maintenance, and along with making physical changes in the road surface that will slow traffic constitute a very viable solution too many of the roads in question. I strongly encourage continued work on down grading the maintenance level on Level 3 roads to resolve both your environmental and liability concerns. A conscious review of this option and minimal investment in changing the physical road surface will not only allow the Forest to have a rational OHV system with benefits of customer satisfaction and protection of the environmental resources but will also support the discretionary defense position of the decision maker.

Response

Analysis of the operational needs of roads and associated maintenance levels will continue to be evaluated as part of long term Travel Management efforts.

Comment 9

Action: Seasonal Closures

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Short term closures: of specific roads when there is known increased traffic (e.g. events, high use weekends, or commercial haul). If the Forest builds this option into the analysis, you can minimize the staff time involved in

implementing temporary orders.

Response

Determining all possible contingencies which might effect short term closures and specifcs of occurence are beyond the scope of this analysis. Specific events do not need to be included in the analysis, because this decision does not affect the ability of the Forest Service to issue access related permits and orders as necessary to allow certain activities or to protect public safety and natural resources.

Comment 10

Action: Outreach/Education

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

Mitigation: Responsible OHV users are extremely unlikely to be involved in a collision with a street legal vehicle on a Level 3 road. Helping all/most users to be responsible (especially the parent of unlicensed youth riders) via education and signs should be considered before closure.

Response

OHV users on Forest Service roads are required to meet appropriate State laws for operation of the relevant vehicle type. Additionally, education and situational awareness is promoted by the Forest Service. An assumption that every OHV recreationist will possess the knowledge and skill necessary to avoid all accidents, however, particularly where severity of risk and injury is high, is not a sound or accepted basis for determining safety policies.

Comment 11

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Change the Law: Consider requiring drivers to have licensed and insurance to be allowed to operate an OHV on a Level 3 or 4 roads. (How about that to whip up some controversy?) It is, however, a more logical solution (based on customer service and environmental protection) than closure.

Response

Changes to State law on vehicle licensing and operational requirements is beyond the scope of this analysis and decision.

Comment 12

Action: Traffic control and safety

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I understand that there may have been one or perhaps 2 poorly documented accidents involving ATV riders and street legal vehicles on the Forest. That is certainly a low accident rate and may or may not have been prevented with prohibitions about mixed use.

Response

Regional policy on mixed use was not established on the basis of any individual accident.

Comment 13

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I recognize the Regional Forester's January 13, 2009 memo makes your job more difficult but there appears to be a great opportunity for leadership to surface on this topic that would allow for continued mixed use. That leadership rightfully should surface on the extensively roaded Plumas National Forest. That leadership would recognize that mixed use constitutes the best opportunity to protect the environment, to provide for customer service, to be cost effective, and to do so by recognizing that the agency and the officials are well protected from liability challenge when making an informed decision. A decision based on fear that a bad thing might happen to a young child is not a good decision and undermines the role of the responsible parent.

Response

The decision is purposed with enacting agency policy.

Letter 20

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	Mailing list only or nothing to code (do not attach a flag)

Letter 21

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I tried to send a note from the home page about the OHV map for the Bucks Lake Area, in particular Section 14 of T23, the Faggs Ranch area. I own the 170 acre piece north of 23N57 and am a little concerned about the continuity of the 'road' 7M12 (pink dots) which appears to have my property on one side and your forest on the other. I know how difficult it is to make these plans and how long you have been working on it and appreciate the public's desire

to travel in the forest. My main concern is whether some of the rider might come in to my meadow there. I appreciate the difficulty of monitoring all this when I have enough trouble with my own area with people coming in, leaving trash and taking firewood, etc! I am sorry I didn't hear about this until yesterday but I would like to go on record with this statement about my concerns.

Response

7M12 has been changed to correctly show as the proper alignment for System Road 23N56Y.

Letter 22

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Valid, Existing Rights/Claims

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

As you know, PG&E [Pacific Gas and Electric Company] is the primary gas and electric utilities provider in northern California and owns and operates multiple hydroelectric generation projects in and around Plumas National Forest.

Our facilities include reservoirs, canals, power plants, electric transmission and distribution lines, gas transmission and distribution pipes, communication sites and other related facilities. Various departments within PG&E are involved in the operations and maintenance of these facilities and continually require vehicle access.

PG&E's associated land rights in and around the Travel Management Plan include fee property ownership, easements, permits and Federal Energy Regulatory Commission (FERC) licenses. Due to the complex nature of PG&E's access rights and requirements combined with the complexity and scale of your Plan, it is difficult to determine all the potential impacts the Plan will have on PG&E's utility business obligations. Due to this uncertainty and the potential for significant impacts to our access requirements, PG&E requests the Plan contain a utility company exemption.

The Plan proposes "Prohibition of cross-country motor vehicle travel off designated NFTS roads, motorized trails and areas by the public except as allowed by permit or other authorization". PG&E proposes the following wording be added: "Permits and other authorizations include road use permits for private land owners, special use permits and Federal Energy Regulatory Commission (FERC) licenses, permits for utility companies, irrigation districts, and their representatives including all travel necessary in the performance of utility facility operations and maintenance, mining plans of operation, timber sale contractors and grazing permits. All motorized vehicle travel necessary for utility operation that is not currently addressed by permit or other authorization is exempt under this Plan until such time as the permit/authorization process for those situations can be addressed." PG&E agrees to work with the Forest to address any outstanding permit/authorization requirements in a timely manner.

Response

The Plumas National Forest will allow cross-country motor vehicle travel off designated NFTS roads and trails as needed by PG&E for access with the understanding that when permits are reissued, the appropriate language will be included in those permits.

Letter 23

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	Mailing list only or nothing to code (do not attach a flag)

Letter 24

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I'm an 82 year old retiree cutting and burning firewood attempting to avoid the skyrocketing costs of alternative heating methods.

And, I've always felt my removal of dead and dieing trees was of a benefit to our forest.

As I understand you proposed Travel Management Plan, the cutting of firewood as well as a number of other historic and harmless uses of the forest by the public will be greatly and unnecessarily reduced.

I hope you will give these thoughts some consideration in your decisions.

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Letter 25

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I am horrified that you allow motor vehicle that can and do cause erosion, watershed and habitat degradation, as well as long-term detrimental impacts to wildlife and cultural resources in the Plumas National Forest.

Response

Your comment has been noted.

Comment 2

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Forest does not belong to motor vehicles and now you want to add more miles to your current transportation system – no! We need fewer miles not more. Leave the forest to the animals; it's their home not ours and yours – instead close roads to motor vehicle don't make any.

Response

Your comment has been noted.

Letter 26

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	FAX
Comment Extension	Request for 90 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Due to the complex nature of the 443 page Draft Environmental Impact Statement on Public Motorized Travel Management, I hereby request a 90-day extension on the public comment period.

Response

The comment period was extended 30 days.

Letter 27

Attributes

Attribute	Value
Early Attention	None
Response Type	Public Meeting Comment Form
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Mapping, GIS

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

When making revisions to an initial proposed action map, items removed (routes, etc.), should be included on the revised map in a different color so that the public can quickly see what was removed and then check the DEIS for the reason.

It's unreasonable for the public to have to spend hours trying to compare maps to see the changes. Every revision should have its own deleted routes color to make the tracking easier.

That also makes it easier to see if there are inconsistencies in the DEIS.

Response

Your suggestion was noted and it was determined that the resulting map would be very cluttered and hard to understand.

Letter 28

Attributes

Attribute	Value
Early Attention	None
Response Type	Public Meeting Comment Form
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Roads and Trails (incl. access general)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I realize the Forest Service has done an extensive job in trying to involve and inform the public; my concern is that this is restricting access to the land for the people.

Letter 29

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	FAX
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I understand from Western outdoor News that a rule that would limit parking in the Eldorado National Forest to "one vehicle length from edge of road" has been written and is possibly already implemented in the Eldorado National Forest.

As you are no doubt hearing from many others, such a restriction is overkill in response to legitimate concerns about abusive off-road travel.

Please revisit this rule with an eye to making it possible for us to park our camping and other vehicles in a manner that is both safe and consistent with protecting the forest(s). A limit of one vehicle length from the edge of the road is neither safe nor reasonable.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Letter 30

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No specific time mentioned or other
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

I was recently elected to represent the people of the Third Assembly District which includes Plumas National Forest. Many of my constituents enjoy using OHV trails and have informed me of how the Plumas National Forest Public Motorized Travel Management proposal will affect their chosen form of recreation. As you know, they have legitimate concerns about the loss of many miles of trails.

My purpose in writing today, is to request your favorable consideration of extending the public comment period for the Draft Environmental Impact Statement (DEIS) for the Plumas National Forest proposal. In reviewing the DEIS, some of my constituents have found numerous errors and confusing references within the document and want to fully understand it before submitting their comments. The quickly approaching deadline will not enable them to complete their research. If you were to grant additional time to help clarify the DEIS, it would allow for better informed public comment.

Response

The comment period was extended 30 days.

Comment 2

Action: Add more mileage to System/do not decrease mileage

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I support further development of OHV trails and the public's right to use our public lands. Although northern California has vast amounts of public land, it has become harder and harder for OHV users to find places to ride legally. With the elimination of cross-country OHV travel on non-designated trails and the resulting reduction of trails and number of miles available to ride on, there will be even less opportunity to continue the type of recreation they enjoy.

Response

Your comment has been noted.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

Limited access will also have a detrimental economic impact on the rural towns and counties which benefit from the business OHV riders bring in.

Response

With new maps depicting motorized trails, it is believed that OHV related business will increase.

Letter 31

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	Request for 45 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

On behalf of the Lassen County Board of Supervisors I hereby request that the comment period on the Draft Environmental Impact Statement be extended for a period of an additional forty five (45) days. Many of our constituents have a keen interest in the Motorized Travel Management Project and the Environmental Impact Report on that project. We would like to assure our comments are measured, relevant and helpful to the Plumas National Forest. Thus, additional time to organize and structure those comments will be required. Thank you in advance for your favorable consideration of this request.

Response

The comment period was extended 30 days.

Letter 32

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No specific time mentioned or other
Request Information	None

Comment 1

Action: Disabled and elderly use

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I have read through the DEIS for the Plumas National Forest Public Motorized Travel Management Plan. The only reference that I found in the document that refers to the Disabled is the Standard Text that is printed on the inside of the front cover of the document. This is unacceptable. The only Alternative that might be considered as not discriminating is Alternative 1, the No-Action Alternative. This Alternative describes the present condition of the Plumas Transportation System. It allows the use of the present Forest Roads and Trails as well as Cross-Country travel by Licensed Vehicles and OHV (Green Sticker Vehicles).

There are many areas on the Plumas National Forest where there is access to remote camping sites, lakes, hunting and fishing opportunities, view points, photography, relaxation, and other activities that are not available to those who travel on the Forest Road System. These sites and activities are available to those people who are healthy, not elderly or disabled or who use a wheelchair. I am a disabled individual that has enjoyed the use of the National Forest for many years. But as my disability has progressed, I am no longer able to hike to these locations to hunt, fish or camp. To reach these locations, I have been using a Quad.

I also have a wheelchair and I have tried to use it on Forest trails. I have had no luck getting anywhere, except to get stuck with the need for assistance to be pulled back to the Forest road where my vehicle was parked. The standard statement is usually written in Forest documents to inform the reader that it is all right to use a wheelchair in an area where motorized vehicle use is prohibited is a ridiculous statement. It is included in the text of the Final Rule document that provides direction on how to write Forest Plans. I was pleased to see that it was not included in the Plumas DEIS, but neither is there any language speaking to any provision of facilities for access by the Disabled or the Elderly to these remote areas of the Forests.

As I read this DEIS, I find that I will be restricted from enjoying many of the activities and locations that I have used and visited in the past. This is Discrimination by the Plumas National Forest as a service that has been provided for me in the past is now being taken away. The Forest is discriminating against people with Disabilities and against those who are elderly and whose health does not permit them to walk or hike up the trails, across country. The Alternatives being proposed in the Plan will eliminate many of the trails, roads and cross country travel that the disabled and the elderly have been able to enjoy in the Forest. This Discrimination will also affect those who must accompany us, to provide for our needs and safety.

This discrimination is based upon Section 504 of the Rehabilitation Act of 2003. The text of the law follows: "Under the Rehabilitation Act of 2003, no Agency in the Executive Branch of the Federal Government can take actions that restrict the use of facilities or systems under their control." In this section of the Rehabilitation Act, the following text is found: "Section 504 states that no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under any program or activity that either receives Federal financial assistance or is conducted by any Executive agency or the United States Postal Service." The Department of Agriculture and the U.S. Forest Service are a part of the Executive Branch of the Federal Government and are obligated to follow the language in Section 504 of the Rehabilitation Act.

Further in the language of the Act, the language states that each Federal agency has its own set of Section 504 regulations that apply to its own programs. Each agency is responsible for enforcing its own regulations. In the portion relating to the Department of Agriculture I found the following information: Purpose: This regulation establishes policy for ensuring positive and continuing notification of USDA equal opportunity policy to the public. The USDA Policy states the following: "It is the policy of the Department of Agriculture: That no person shall be discriminated against on the basis of race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, or marital or family status in employment or in any program or activity conducted or funded by the Department." The Law is formed under the following Authority: a Titles VI and VII of the Civil Rights Act of 1964, as Amended (42 U.S.C. 2000d, 2000e-16), b 28 CFR 42.401 et seq., Department of Justice Guidelines for Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs under 7 CFR Part 15, USDA Nondiscrimination Regulations, d Section 501, 504, and 505 of the Rehabilitation Act of 1973 (29 U.S.C. 701, 794).

To bring the Plumas National Forest Public Motorize Travel Management Plan into compliance with Section 504 of the Rehabilitation Act of 2003, I believe that increased emphasis and flexibility needs to be inserted into each of the Plan Alternatives. This will provide access to the Disabled and to the Elderly who use of Quads and Single Track Motorcycles. They will then be able access those areas that the healthy can enjoy by using existing roads, trails, and cross country travel where damage to the environment and wildlife would not occur. There are many areas on the Forest that provide areas where the Disabled and Elderly will not be able to visit after the Plan is finally

adopted. A reconsideration of the Forest, the Alternatives, and the Plan as a whole is required to provide access to all of its visitors and to eliminate the Discrimination that this Plan and its alternatives fail to consider.

Within the Plan's Alternatives there are many references to special needs and actions that need to be taken to protect the vegetation, the soil, the water, the wildlife, and other facets of the Environment. In some cases, Special Areas are being proposed to protect vegetation, scenic areas, and special unique features of the Forest. These areas can be utilized by those that are fit and healthy and are to hike into areas such as stream sides, hillsides, ridge tops, meadows, botanical areas and geological features. But again, there is no language or references in this Plan which speaks to providing Motorized Access into those areas for persons with Special Needs.

I am sure that there are other areas that are currently used by the Disabled and the Elderly OHV riders on the Plumas, who have similar areas that they now enjoy, that will be unavailable or not accessible to them if the Plumas continues with their current Discrimination Process.

I am asking that an Extension of Time be given to each Specialist who has provided input into this plan to review their respective areas on the Forest and their original Plan input and then take time to consider how their input will affect the Disabled and the Elderly and their ability to enjoy the entire Forest. They must then submit a revised report to the Plan on how they plan to provide access to the Disabled and the Elderly. When this information has been put together into the Plan, a review of the revision needs to be completed to insure that access to this segment of the population is provided.

A point to realize, the Disabled and Elderly make up a majority of the Plumas County population and that of California as well based on Data for the last Census. Also, the Disabled and Elderly support the Forest by paying their taxes. These groups as they learn that the Plumas has provided access to them will visit and utilize the Forest and County. This will have a positive affect on the economy of the County.

Response

Under section 504 of the Rehabilitation Act of 1973, no person with a disability can be denied participation in a Federal program that is available to all other people solely because of his or her disability. In conformance with section 504,wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle in § 212.1 of the final rule, even if they are battery powered. However, there is no legal requirement to allow people with disabilities to use OHVs or other motor vehicles on roads, trails, and areas closed to motor vehicle use because such an exemption could fundamentally alter the nature of the Forest Service's travel management program (7 CFR 15e.103). Reasonable restrictions on motor vehicle use, applied consistently to everyone, are not discriminatory

Letter 33

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	Request for 30 Day comment period extension
Request Information	Other request for specific information

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Wilderness Society requests an extension to the comment period for the Draft Environmental Impact Statement for motorized travel management in the Plumas National Forest. Our organization has been deeply involved in the management of the nation's public lands since 19345. We take great pride in the level of commitment we have toward National Forest management and therefore always attempt, given our resources, to provide the most informed and complete comments as possible.

We feel, however, that we are not able to provide adequate comments by 11 February 2009 due to the lack of system route data from the Plumas National Forest. In our scoping comments we requested that "the Forest Service determine the decision status of all the putative system routes that we have identified for decommissioning in our citizens' alternative, and provide this information to us prior to the release of the Draft EIS" (page 6). To satisfy this request, we expect the Plumas National Forest to provide us with, at the very least, the database files for routes that are in INFRA. The Tahoe National Forest has provided us with these data in the form of a CD of an INFRA data capture. Dave Arrasmith (Forest Planner, Tahoe NF) could answer any of your questions about sending the data to the public.

Without the INFRA or similar information we are unable to determine the status of routes that are supposedly in the system and will designated under the alternative described in the DEIS. We request a 30 day extension from the time that we receive the system route data.

Response

The comment period was extended 30 days. INFRA data was provided to the Wilderness Society.

Letter 34

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

My response to the Off Highway Vehicle Travel Management Plan follows. Of the five alternatives shown the only acceptable alternative is Alternative #1, with modifications. All other alternatives are unacceptable to me as all trails we have identified as being used are not on Alternative #2 thru 5. With alternative #1, we would continue to use 1109 miles of routes that we already have and shouldn't be taken away. The other alternatives seem to start with 0 miles, and then add "a few" of those that have been "surveyed". I don't know why anyone would think #2 thru 5 would be acceptable.

Response

Your comment has been noted.

Comment 2

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I vote for continued use of all inventoried unauthorized routes (Alternative #1), eliminate cross country travel, add a 36-acre motorized vehicle open area at Sly Creek.

Response

Your comment has been noted.

Comment 3

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I travel into the back country to enjoy "our" public lands whether it is fishing, camping, hunting, hiking, or whatever, and I do not think the government should be restricting my use. More focus should be put on managing our recreational areas.

Response

Your comment has been noted.

Letter 35

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

This is my response to the Off Highway Vehicle Travel Management Plan. There are five alternatives shown—I can only say that the only acceptable alternative is Alternative #1, with modifications. All other alternatives are unacceptable to me as all trails we have identified as being used are not on Alternatives #2 thru 5. With alternative #1, we would continue to use 1109 miles of routes that we already have and shouldn't be taken away. The other alternatives seem to start with 0 miles, and then add "a few" of those that have been "surveyed". I don't know why anyone would think #2 thru 5 would be acceptable.

Response

Your comment has been noted.

Comment 2

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I vote for continued use of all inventoried unauthorized route (Alternative #1), eliminate cross country travel, add a 36-acre motorized vehicle open area at Sly Creek.

Response

Your comment has been noted.

Comment 3

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I travel into the back country to enjoy "our" public lands whether it is fishing, camping, hunting, hiking, or whatever, and I do not think the government should be restricting my use. More focus should be put on managing our recreational areas.

Response

Your comment has been noted.

Letter 36

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

I was once told by an old time Plumas County resident that the day would come when the forests would be closed. Well between the Alternatives I am looking at and the projected new permit fees for recreation residents it looks like we are getting very close!

All but alternative 1 leaves too many roads and trails out of the system. The fact that there is no timeline on the routes for mitigation probably means that they will never be studied due to lack of funds. I do agree that all cross country travel should be stopped. Roads that lead to back road campsites should be available on a permit basis. That way there would be a follow-up on usage and a way to know that an area is being used. The same permit system could be used for firewood access. If a trail shows signs of deterioration, than close it for a period of time so it can heal or be repaired. This process seems to work quite well for the OHV trails on the Foresthill divide.

An agreement needs to be reached between CHP, local law enforcement, and USFS concerning OHV vehicles using forest roads for access. This should be done before any alternatives are adopted. Staging areas would be helpful.

The number of miles of proposed closures in alternates 2-5 means that remaining trails will see more use and will become more degraded and less secluded.

Response

The Decision does not affect system roads that lead to back road campsites. The public commented on unauthorized routes and requested several routes be included specifically due to campsite access. 10 miles of routes specifically to access campsites not already accessed by system roads are included in the Decision.

For permitted activities, the Forest may allow off-road travel through specific permit language, as deemed appropriate. The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, by law, requires the Forest Service to regulate OHV travel on Forest lands. The Forest has coordinated with other law enforcement agencies, however, the law does not require specific agreements codified by documentation, such as memorandums of understanding.

Several staging areas exist within the Forest and more may be added in the future.

Comment 2

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I have been riding roads and trails in the Bucks Lake area for 50 years and cannot see where there needs to be any closures or there is a problem. It would be nice if some of the green sticker funding could go towards road maintenance, especially when it comes to culvert cleaning. And yes would it not been nice to have had the Willow C creek bridge in place last summer when you had fire on both sides. How many years have we been advocating this replacement?

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, by law, requires the Forest to prohibit cross country travel by designating roads and trails open to vehicular travel by vehicle type. There are no road closures in the Bucks Lake area closed by this decision. Unauthorized routes that have unmitigable resource damage or negatively impact private landowners are not appropriate for designation.

Determining expenditure of Green Sticker funds is outside the scope of this Decision and outside the authority of the Forest Service.

Specific bridge replacements are outside the scope of this decision.

Letter 37

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Public roads need to stay open for many reasons. Hunting, fishing, camping, OHV, woodcutting, handicap access, and most important of all is fire protection, are some of the reasons.

Comment 2

Action: Influence of Interest Groups and Politics

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

To close any of our public roads is just another sign that the USFS is not capable of being responsible caretakers of our public land. Local people within a National Forest need to determine what happens in that Forest, not special interests groups.

Letter 38

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Your letter dated December 18, 2008 invited comments on the Draft Environmental Impact Statement (PNF DEIS) for the Plumas National Forest Public Motorized Travel Management Project. South Feather Water and Power Agency (SFWPA) previously provided comments on an early draft route designation map in 2007, and now provides comments on the proposed Sly Creek OHV area, designated "8PA-2." SFWPA recommends against designating this as an open area for OHV use.

The PNF DEIS indicates that alternatives 2 (preferred alternative), 4 and 5 include a 36-acre area open year round to OHV use vehicles 50" or less at Sly Creek Reservoir adjacent to the developed Sly Creek campground. The campground is on Plumas National Forest land and is operated a maintained by SFWPA under a special use permit. The DEIS does not address issues related to potential conflicts between the proposed OHV area and this existing campground.

In the introduction to the section on Recreation Resources (PNF DEIS Page 37) is the statement:

"The Travel Management Rule requires that we examine the compatibility of motor vehicle use with existing condition in populated areas; the conflict between motor vehicle use and existing or proposed recreational uses of NFS land or neighboring federal lands; and the provision of recreational opportunities and access needs" (emphasis added).

The subsequent analysis appears to have ignored the presence of the developed campground facilities adjacent to the proposed OHV area, as the discussion of the Alternatives focus on motorized and dispersed recreation. No mention of the Sly Creek Campground area and any potential conflict with uses were made in the Recreation

Resources section, although a reference to the campground was found in the Soil and Water Resources section. Therefore, the conflict between motor vehicle use and existing recreational uses of NFS lands has not been addressed in the PNF DEIS.

Evidence that conflicts would be created b y designation of the Sly Creek OHV area already exists. Recreational visitor surveys conducted in 2004 for the re-licensing of the South Feather Power Project indicated that 80 percent of the recreational use conflicts reported at Sly Creek were related to OHV use (noise, riding in the campgrounds, disrespect of boundaries and rules). Another survey question that asked whether any observed activities were harmful to the environment resulted in 67 percent of the responses indicating that OHV use was destroying campground vegetation (SFWPA License Application, March 2007, pages E7-102 – E7-104). The PNF DEIS states that an ephemeral channel is currently used as access to the proposed OHV area from the campground, but does not describe what new access will be created to avoid conflicts with the campground.

Response

The Sly Creek Use Area will require mitigation before it can be used. That mitigation will include improved access, signing and watershed restoration. We feel this is an appropriate use of this open area and will benefit campground users.

Comment 2

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.6.2 and Appendix F of the Soil and Water Resource Report

In the PNF DEIS section on Soil and Water Resources (page 89), PNF staff note that the area [Sly Creek OHV] is rated as "High" for soil and water resources effects. The area access approaches have excessive rutting and erosion that are causing the discharge of sediment to the drainage system in the vicinity of the campground. The PNF DEIS indicates that mitigations are prescribed for the area and that the area should not be opened to motorized traffic until the mitigations are in place, but does not identify what the mitigation measures are or how the access to the area will be reconfigured to prevent future damage or use conflicts.

On April 14, 2008, the Forest Service provided Preliminary 4(e) Terms and Conditions for a new license for the South Feather Power Project. Included in Forest Service Condition 20, Part 1 was a requirement that SFWPA implement capital improvement projects including amenities such as parking and off-loading ramps for the proposed Sly Creek OHV use area. In the Federal Energy Regulatory Commission's November 2008 Draft Environmental Impact Statement (FERC DEIS, page 3-155) for the re-licensing of the South Feather Power Project, FERC staff recommended against such a facility. They noted that OHV use at the project was low and that future demand was estimated to increase only slightly over the next 40 years. The parking and off-loading facilities proposed by the Forest Service would not be necessary for current or future recreation demand. This low amount of use was also noted in the PNF DEIS, which identified OHV use as the primary activity accounting for only 0.3% of visits to the Forest (PNF DEIS, page 40).

Unless the Plumas National Forest can describe how the conflicts with existing recreation uses at Sly Creek campground and impacts to soil and water resources will be mitigated, the proposed Sly Creek OHV use open area 8PA-2 should be eliminated from consideration under Alternatives 2, 4, and 5.

Response

Section 3.5.6.2. Mitigations for soil and water impacts at the proposed Sly Creek area are described in Appendix F of the Soil and Water Resource Report. The current OHV approach to the area will be reconstructed to a less steep grade with features installed to disperse surface drainage and prevent erosion and sedimentation. Access to the ephemeral channel that leads to the Sly Creek Campground will be blocked and traffic excluded.

Letter 39

Attributes

Attribute	Value

Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Add more mileage to System/do not decrease mileage

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please keep all roads open as we are losing too many roads and trail in our National Forest's here in California. I do a lot of hunting and fishing and four wheeling both 4 wheel and ATV's so please try to keep our roads and trails open as the anti's are closing too much of our forests.

Response

Your comment has been noted.

Letter 40

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

True cross-country travel should be prohibited; this would not include most of the 1100 miles of "unauthorized routes".

Response

Your comment has been noted.

Comment 2

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Firewood cutting should be allowed on any road or route where it was allowed previously. Can we use the Lassen NF policy?

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Comment 3

Action: Roads and Trails (incl. access general)

Resource(s): Cultural Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Historic roads should remain open to preserve our right to access or cultural resources, not everyone can walk in to these sites.

Comment 4

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Access to traditional dispersed camping sites must be retained.

Response

See Recreation Section 3.2.5.1 Indicator Measure 4 for specific information on reduced dispersed camping opportunities. Additional trails can be added in the future to access dispersed camp sites that were not included in this analysis.

Comment 5

Action: Legal Consistency General (E.g., democracy/welfare/public good)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Roads or routes that end at or transect private property should not be arbitrarily rejected. Prescriptive rights of travel exist on many long established routes. It is up to the Private Landowner to sign or gate their property.

Response

The Forest Service does not recognize prescriptive rights of way and therefore require easements before we can designate system roads or trails.

Comment 6

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

A sixth alternative that incorporates these and other concerns must be developed.

Response

Your comment has been noted.

Letter 41

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

After reviewing the options I feel that options 1 and 3 should be eliminated, because they are both too extreme. The most reasonable solution must incorporate the need for recreation as well as conservation. Option 4 should also be eliminated because of its extremely adverse effects on recreation. By eliminating cross country travel, you have made a huge step towards conservation. Having trails through areas does not adversely affect its natural characteristics; they merely provide a way for the public t enjoy the forest.

Of the remaining options (2 and 5), both have some good features. I like the idea of the designated open riding area but think you should make it somewhat larger for safety reasons. The reason is that If too many people are concentrated in too small of an area, chances of collision are greater.

Please cast my vote for option 2 (first choice) and option 5 (second choice).

Letter 42

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please don't implement the same regulation as the Eldorado Forest. Parking on or just off road can be dangerous and subjects your vehicle to break-ins and vandalism.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Comment 2

Action: Enforcement/Funding/Staffing

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have a handicap and must drive as close as possible to my camping or fishing spots. I don't like ATV's anymore than you do but penalizing everyone is not the solution. Stricter law enforcement, lager fines and more wardens on patrol is the answer.

Response

Your comment has been noted.

Letter 43

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Enforcement/Funding/Staffing

Resource(s): General Ecological

Disposition: Resolved: Comment acknowledged; does not provide new information

Police off-road vehicles to keep them on authorized trails with minimal ecological impact. Users of these vehicles go anywhere they choose and don't consider that they chew up the earth and vegetation irreparably.

Response

Your comment has been noted.

Letter 44

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

This development, of creating noise, pollution, and erosion, and damage to ecosystems through motor vehicles for "recreation" is utterly against the whole concept of recreation, health, natural settings environment.

These recent vehicles all cause habitat loss on a major scale.

Just because they were invented does not mean they should be allowed on public lands.

Lands here suffer from the change from successional growth to mud.
Species of macro vertebrates leave, and are pressured into smaller habitats and otherwise stressed.

Humans get nothing but more urban noise and worse, the evidence of overrun native plants and damage to the roots of trees in the time of vastly accelerating global warming.

Please cease to allow any motor vehicles for this bogus "sport" which has ruined immense areas already in the past years.

Letter 45

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)

Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Motor vehicles already dominate our urban and suburban landscapes. Must we give over our wild and wilderness quality public lands to them as well, when their widespread use diminishes or even eliminates the many non-motorized types of forest recreation enjoyed by so many of us, as well as compromising the watershed and wildlife habitat values of wild forests?

Letter 46

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Noisy, polluting, joyriding "motorized travel" vehicles have absolutely no place in our parks and forests. They destroy the terrain, frighten the animals and pollute the environment. So, why in the name of God are you considering giving these motorized monsters more access to irreplaceable wild lands? Who is "greasing" these wheels? Let them go race elsewhere. This is just ridiculous and unacceptable. Our wild lands area already under assault from climate change, etc. etc. so it seems just plain wrongheaded to add to the destruction by acting like a bunch of ravenous locusts on the land.

Letter 47

Attributes

Attribute	Value

Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The science has shown that roads in forests are detrimental to forest systems with negative impacts on the wildlife and habitat. It is wrong-minded to consider adding more roads especially because of their adverse effects on forest ecosystems. Our wildlife is already under duress due to human impacts. This adds salt to the wound.

Response

The Plumas NF Travel Management FEIS does not propose or consider adding more roads to the ecosystem. The proposed routes being considered under the action alternatives (2-5) and the unauthorized routes (Alt 1) already exist on the landscape. The action alternatives (2-5) significantly reduce impacts to wildlife and the ecosystem over alternative 1 by reducing the miles of routes that would be added to the NFTS and preventing cross country vehicle travel and the future proliferation of routes.

Letter 48

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Ecosystem Emphasis

Resource(s): General Ecological

Disposition: Resolved: Comment acknowledged; does not provide new information

I trust that you will change with the new administration and act like the stewards of the environment as you should.

Response

Your comment has been noted.

Letter 49

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 9

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the FEIS include site-specific analysis of all inventoried routes.

Response

Approximately 410 miles of inventoried routes were surveyed and those site-specific summaries can be found in Appendix A of the FEIS.

Comment 10

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

It is also my understanding biologists may prefer a rain based system for frog protection. I request that the FEIS address and compare alternative wet condition closure methods, i.e. rain gauge, to the seasonal closure prior to making a decision.

Response

The Plumas National Forest has recommended appropriate season of use dates. The Forest will work with the Regional Office to develop a rain gauge system for closure and the use of the web for users to monitor when trails are opened. Also, reference Chapt. 3 of the FEIS; Soil and Water Resources (section 3.5.6.2) for a complete description of the season of use in relation to soil and water resources. The Forest is also in Formal consultation with USFWS and mandatory terms and conditions, which may include season of use restrictions, from the Biological Opinion; to protect the California red-legged will be incorporated into the FEIS and Record of Decision.

Comment 11

Action: Mitigation/BMPs

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Future route creation, mitigation or decommissioning would be based upon the Watershed BMP for OHV use listed in Appendix D: (see attached). Unlike the DEIS's desktop (GIS) or visual methodology for determining which routes are excluded from the process, this BMP provides a systematic process using baseline water quality data and monitoring based upon the OHV plan objectives.

Response

The Best Management Practice for Water Quality Monitoring of OHV Use (Practice 4-7) is described and applied to this FEIS in section 3.5.2. Information has been added to the "Soil and water quality monitoring" section of chapter 2. This information describes water quality standards, the amount of acceptable change, and baseline water quality for normal conditions.

Comment 12

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

This [OHV] alternative would maximize the ability to receive OHV grants from California's OHMVR. As the amount of recreation opportunity available is a criteria considered for awarding grants. The PNF would then be able to leverage grant monies to do the appropriate mitigation, re-routing, new trail creation and/or decommissioning. The later of which is not addressed in alternatives 1-5.

Response

OHV grants from California's OHMVR will be submitted based on trail mitigations needed on designated trails.

Comment 13

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the FEIS include: an OHV alternative.

Response

Your comment has been noted.

Comment 14

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process), Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: The "Soil and water quality monitoring" section of chapter 2

I request that the FEIS include: State the PNF's OHV water quality plan and forest plan objectives for each routes area.

Response

Forest plan goals, policies, standards and guidelines for off-road vehicles can be found in the 1988 PNF Land and Resource Management Plan. Soil and water quality monitoring planned for this project is described in chapter 2.

Comment 15

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the FEIS include: Address the economic impact each alternative has upon the receipt of grant awards.

Response

Grant awards would be based on California OHMVR money and the Plumas National Forest OHV needs. It would be difficult to make an estimate of what might be awarded to the Plumas National Forest with this program. There are other grant opportunities for OHV trail maintenance that should be utilized.

Comment 16

Action: Monitoring, Inventories

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Explanation: Each Forest's OHV plan will:

- Identify areas or routes where OHV use could cause degradation of water quality.
- Establish baseline water quality data for normal conditions as basis from which to measure change.
- Identify water quality standards and the amount of change acceptable.
- Establish monitoring methods and frequency.
- Identify controls and mitigation appropriate in management of OHV's.
- Restrict OHV use to designated routes.

Implementation: Monitoring results are evaluated against the OHV plan objectives for water quality and the Forest Plan objectives for the area. These results are documented, along with the actions necessary to correct identified problems.

If considerable adverse effects are occurring, or are likely to occur, immediate corrective action will be taken. Corrective actions may include, but are not limited to, reduction in the amount of ORV use, signing, or barriers to redistribute use, partial closure of areas, rotation of use on areas, closure to causative vehicle type(s), or total closure, and structural solutions, such as culverts and bridges.

Response

Project monitoring for soil and water resources is described in section 2.3.1 of the FEIS. Since the DEIS, information has been added to describe water quality standards, the amount of acceptable change, and baseline water quality for normal conditions. Mitigations for soil and water resource effects are described in section 2.3.3.

Comment 17

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I request the FEIS includes a response from the California OHMVR regarding the abandonment of the routes which have received monies from their division.

Response

To our knowledge, there are no motorized roads or trails that have received OHMVR monies that are not included in the Travel Management FEIS.

Comment 18

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I request the FEIS include documentation from private landowners who are objecting to any route leading to their property.

Response

The Forest Service does not recognize prescriptive rights of way and therefore require easements before we can designate system roads or trails.

Comment 19

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

I request that system routes 24N25X and 23N00C be included on all alternatives.

Response

These corrections have been made to all maps.

Comment 20

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe that the Forest Service should not label a route as non-existent without first contacting the users who submitted the route for inclusion. Therefore, I request that route 7M08 be included on all alternatives.

Response

This route was not surveyed and will be considered in the Granite Basin Travel Management Plan.

Comment 21

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the FEIS include a map of all CIRA locations. In addition, I request the FEIS reference all previous decision's authorizing the closure of routes through CIRA locations. Finally, lacking a previous decision, the routes through CIRA locations shall be designated open in all alternatives.

Response

A map of Citizen Inventoried Roadless Area locations will be provided in the project record. One of the issues identified during public scoping was to exclude routes in CIRAs in Alternative 4.

Comment 22

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the FEIS include an analysis of the social economic impact each alternative will have on the surrounding businesses, communities, counties, etc.

Response

Due to limited OHV use on the Plumas National Forest, a social economic impact analysis was not completed for this document.

Comment 23

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the FEIS include open areas for trails bike use. (i.e. areas previous used by the Sacramento Pits in Granite Basin and La Porte.

Response

These areas were not surveyed for inclusion in this Travel Management FEIS.

Comment 24

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I request that the FEIS alternative 5 include routes that show only "previous" extreme resource damage, i.e. 5M15, 21, 22, 23 and 30, 6M03A, 04 and 10 S. I agree that these may have had in the past contributed to excessive soil erosion initially. However, it is of my opinion that these routes have been relatively unchanged over many years and thus has current minimal effect on forest resources, especially when wet condition closure policies are in place. Please note the FS site visit in some areas occurred after the 2008 fires, without consideration of the damage caused by the fire itself. Therefore, I request the FEIS include site specific analysis of the actual yearly soil erosion occurring on all routes labeled extreme prior to excluding these routes from the preferred alternative.

Response

Soil and water resource effect rating categories for proposed trails are described in section 3.5.3.1 of the FEIS. Route-specific summaries of soil and water effects and prescribed mitigations, including the season of use mitigation, are presented in Appendices F, G, and H of the Soil and Water Resource Report. Since the DEIS, field surveys have been completed for all proposed routes within the perimeter of the 2008 Butte Lightning Complex wildfires (section 3.5.3.1). Erosion rates vary substantially from year to year, primarily due to wide variations in precipitation and runoff patterns. Site specific monitoring and analysis of the actual yearly erosion magnitude occurring on all routes rated "Extreme" is well beyond the capacity of PNF staff and budgets and is not required by the State Water Resources Control Board per Water Quality Management for Forest System Lands in California (section 3.5.2 of the FEIS).

Letter 50

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

As my introduction to the following statement, I would like to add that the quiet wilderness is gradually disappearing. Over the past 4000 or 5000 years, the human species has taken away Nature's gift to the earth, the wilderness so that not much is left. Please help preserve that little as in the Plumas National Forest.

Letter 51

Attributes

Attribute	Value

Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Please listen. Motorized vehicles for recreaton do not belong in the forest. There are plenty of oher places for them. Thank you for preserving this distracting destruction.

Letter 52

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Just because the uneducated do not see or are not aware of micro-habitat inhabitants does not mean that an area is not vital to the over-all health and vitality of a forest!

Letter 53

Attributes

Attribute	Value

Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I get enough noise and fear of being run over every day without having to contend with it in the last bit of wild areas left. Even if my needs weren't that important, those animals and plants that live in these wild areas should be considered first.

Letter 54

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Climate

Disposition: Resolved: Comment acknowledged; does not provide new information

Are you crazy; more roads for idiot off-roaders, they don't belong anywhere in the wilderness and they contribute heavily to global warming. Good God lets save the little that is left, before the entire planet is dead.

Response

Your comment has been noted.

Letter 55

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Ecosystem Emphasis

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Our wild lands were under unrelenting siege during the Bush years. Here's an opportunity to begin traveling in another direction. Our land needs all the help it can get.

Letter 56

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Fragmenting wilderness with roads threatens habitat and biodiversity.

Letter 57

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I find it aggravating that you would not only chose to go forward with an already harmful program for off-road and forest motorized travel but to authorize more irresponsible use of our land.

Letter 58

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have seen the devastation caused by the current dirt roads! Do not add more! Fix what is there.

Letter 59

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

What we do today affects the world we pass on to future generations. Please help to assure that those who will follow us have a world as beautiful, or better, than that in which we live.

Letter 60

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Hi! I've hiked and camped in the Plumas. It's a beautiful spot. Please stand up for the little wilderness left for my kids and their kids. Thank you! Think "seven generations" down the line.

Letter 61

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Influence of Interest Groups and Politics

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I sometimes wonder who you're working for. Who's filling your pockets? Whose agenda are you serving? Certainly not the public's.

Letter 62

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

What are you thinking; 364 miles of new roads and trails in "roadless" areas of National Forest?
What about the impacts on wildlife? What about impacts on hikers? I'm not totally against ORV usage. But you must know that it is incredibly abusive to the environment and should be restricted to areas that are already degraded and very localized so the sound impacts of this activity are restricted to a minimum area of human and wildlife impact.

Letter 63

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I'm a native Californian and have enjoyed all my life the natural beauty this state offers. I fully support legislation that protects the environment and urge you to do all you can to safeguard California's natural treasures.

Letter 64

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Influence of Interest Groups and Politics

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Who are you accommodating this time over considering the needs of the natural forest habitat? The growing force of off-roaders who are lobbying for more roads and more wildland to destroy.

Letter 65

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I live in Truckee, California in the northern Sierra Nevadas, just a few hours' drive south of the Plumas NF. We used to visit the Plumas NF area frequently, but it too became over run with motorized vehicles. The Tahoe National Forest and the surrounding national forests in both Nevada and California are being decimated by vandals using motorized vehicles. Twenty years ago, one could walk quietly in the forest. No one is never out of earshot of some type of motor. The motor heads do not stay on trails; they knock down signs and go where they are supposedly prohibited. We used to have a beautiful spring that was covered with yellow monkey flowers and shooting stars. That was until two ATV's did donuts and completely destroyed it. The spring ten years later has never recovered from the assault.

No more roads in National Forests, National Parks, and other Public lands. Please stop this madness.

Letter 66

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have camped, hiked and explored this forest and would like to continue to do o without being disturbed by loud engine noise from off-road vehicles. This is already a problem on the existing dirt roads behind Plumas Eureka State Park, especially during hunting season.

Response

Your comment has been noted.

Letter 67

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Parks should not allow the public to travel these sensitive areas in motorized vehicles. The public should walk these areas, thus taking in the magnificent wildlife and their natural habitat. The wildlife should not be disturbed by the visiting pubic.

Letter 68

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

My father, God rest his soul, would turn over in his grave at the insult ORVs are to nature's beauty. I would have to agree with him 100%.

Letter 69

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Adding more roads when they are not needed only add to the cost. Instead, the existing roads should be maintained.602

Letter 70

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

My family lives right by the Plumas National Forest; almost daily, we hike, hunt, fish and completely enjoy the forests. We want them protected for our children's children.

Response

Your comment has been noted.

Letter 71

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am concerned that in these times when non-motorized recreation opportunities are increasing, due to wilderness designations and new trail construction for hikers and mountain bikers, motorized recreation opportunities are decreasing. It seems to me that there is significant demand for sustainable and responsible motorized recreation, and the USFS should be trying to meet that demand just as it does with non-motorized recreation, logging, grazing, etc…

Response

Your comment has been noted.

Comment 11

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Like most responsible forest users, I am strongly in favor of allowing motorized use only on designated trails, and prohibiting cross-country travel, but I think there must be sufficient motorized trails designated to safely disperse use, and allow a scenic and primitive backcountry experience for motorcyclists, ATV's and 4-Wheel Drive Vehicles, as well as providing better access for hunters, hikers, and bicyclists.

Response

Your comment has been noted.

Comment 12

Action: Volunteer Groups and Partnerships

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As an avid bicyclist, I appreciate the work that many motorcycle clubs do in maintaining and clearing excellent single-track trails. As we have seen in Downieville, even fairly heavily used trails can be shared between bicyclists and motorcyclists, and the green-sticker funding and motorcycle club volunteer manpower help keep these trails sustainable and enjoyable for all.

Response

Your comment has been noted.

Letter 72

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I grew up in Lassen County, next door to Plumas County, and have spent many days hiking, backpacking and camping through the forests in question. Already decimated by over logging (hence the plethora of logging roads), this extraordinary natural area deserves our attention, care and restoration. Please let it be in peace and quiet.

Letter 73

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Isn't it time we lived with nature and didn't destroy it for our stupid activities?

Letter 74

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

My family and I camp and explore the wonderful back roads and trails of the Plumas NF several times a year. I would encourage you to keep these areas open for future generations to appreciate. It seems to me, that once trails are closed, they are never opened again.

Response

Routes that are not designated with this project may be added at a later date as no routes will be decommissioning with this project.

Letter 75

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

There is a desperate need for Forest Service policy to recognize and curb the negative impact of ORV's and snowmobiles in our National Forests. Now is the time to reverse the destruction of our forest resources promoted by the Bush administration.

Letter 76

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We simply do not need or want any more roads and certainly not any vehicles in our national parks, forests and wilderness areas.

Letter 77

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

When I visit my national forests, I do not want to listen to the racket of motorized off-road vehicles. They are as noisy and annoying as a swarm of hornets at your picnic. There needs to be a separate area for these noisy, smelly pleasure vehicles, but not near where people go for a quiet restoring day in the forest.

Response

Your comment has been noted.

Letter 78

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

ORVs and destructive roads out of the Plumas National Forest! Enough is enough!

Response

Your comment has been noted.

Letter 79

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Please do not close our beloved tight woods trails.

Letter 80

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I live next to Plumas National Forest. I would not want more roads. How about cleaning all the forest up first?

Response

Your comment has been noted.

Comment 7

Action: Add more mileage to System/do not decrease mileage

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

What about more waling and hiking trails?

Response

Your comment has been noted.

Comment 8

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I own 3 4x4 drive vehicles. We do not need more roads. Just more brains to fix our damaged forests. Decades of mismanagement.

Response

Your comment has been noted.

Letter 81

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I'm truly outraged by the proposal to add more motorized recreation in the Plumas National Forest. All motorized recreational vehicles should be banned! The peace and quiet of the forest should come first. Nothing but chaos and destruction will result from increased motor traffic. Please reconsider this draft plan calculated to ruin the environment, disturb the wildlife, and drive peaceful campers and hikers out of the forest.

Letter 82

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Increasing ATV use of off road travel will contribute to global warming, killing wildlife, and ruining the wilderness areas for those of us who like a natural scene.

Letter 83

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Because my grandfather was a fly fisherman and golfer, and built a retirement home in Graeagle, my family had the opportunity to spend many happy hours hiking and backpacking in the Plumas National Forest. I hope that the beauty and serenity of this area will still be there in the future, for my grandsons to enjoy.

Letter 84

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We have enough roads – we don't want any more.

Letter 85

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Please protect the Plumas from further roads and development.

Letter 86

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

No more roads, please! When does it end? We have too much development and urban sprawl as it is! When does nature have a say in all this?

Letter 87

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I hate off-road vehicles. They are noisy and destructive to our national landscape.

Letter 88

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I agree completely with the following letter. But to say it quickly—we're all busy people—please just bag the idea of more motorized trails and access. Japanese manufacturers of motorcycles don't need our help to ruin any more forests, and disturb Plumas wildlife, thanks! I know you folks have a hard job.

Letter 89

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I remember fondly visiting places like this as a child to camp with my family. We enjoyed the gorgeous scenery and were very careful not to leave a footprint. Please save these beautiful wild spaces for future generations to enjoy!

Letter 90

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

What parts of the impact that erosion causes and cumulative effects do you not understand? Allowing motorized vehicles beyond safety and maintenance vehicles into pristine protected lands is ignoring your job for good land stewardship. There is no way this can be mitigated.

Response

The full length of each proposed trail was field surveyed. Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in Appendices F, G and H of the Soil and Water Resource Report.

Letter 91

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

It is unwise and destructive to suggest that any further roads or motorized trails be injected in the Plumas National Forest. The last eight years of negative interference with the natural terrain of our environment has brought nothing

but disgrace and embarrassment on the USA. It must stop and now is the time.

Letter 92

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Visual Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

My young daughter and I spend time every year in the Plumas National Forest, and we look forward to the beauty and serenity of this land. Please do not increase new roads or motorized trails to this pristine land.

Letter 93

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): General (No Natural Resource)

Disposition: Resolved: Comment acknowledged; does not provide new information

Don't spoil those [precious memories] with more roads and traffic and more noise and pollution!

Response

Your comment has been noted.

Letter 94

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

As a Registered Environmental Health Specialist certified by the California Department of Public Health, I have dedicated my career to protecting public health, safety, and the environment. I am always encouraged to act when public policy affects these issues, and it is time that we realize that a strong economy and a healthy environment are not mutually exclusive. Conservation, efficiency, and sustainable development and energy policies are the keys to our collective future.

Response

Your comment has been noted.

Letter 95

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

As a California Native, I urge you to protect our remaining wild lands and not allow off road vehicles into these areas – specifically Plumas National Forest. There are many places now available for off road vehicles and less and less wild lands. It is incumbent upon us to protect what is left of these lands for our children and theirs.

Letter 96

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Action not Specified

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

All wilderness and wildland areas are permanently harmed by the introduction of more roads. Once the wilderness is gone, it's gone, and no short-term profit will compensate for its loss.

Letter 97

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I live in NE California and I use the national forests in the area (Plumas, Lassen and Modoc) for low-impact recreational purposes: bird watching, hiking, fishing. In my opinion, there are already too many roads, many of them renegade and poorly or un-maintained, on the forest. Far from permitting more such roads, I would prefer to see the closure and elimination of many of the existing roads that result in damage to vegetation, erosion, sedimentation into streams, etc. There needs to be a lot more attention paid to protecting our public lands resources.

Letter 98

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Opposition (suspend/stop)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Don't bring noise and air pollution to our treasured areas.

Letter 99

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested

Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

People who live in the Bay Area look to places like the Plumas National Forest as vital opportunities to escape from the noise of motor vehicles from the cities. Please do not allow my solitude in the woods to be disturbed by any additional roads.

Letter 100

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Another issue is that you seem not to be aware of the devastation and problems already going on with off road vehicles in cities all over the United States. How do you propose to handle the proliferation into Forest lands?

Letter 101

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested

Request Information	None

Comment 6

Action: General Opposition (suspend/stop)

Resource(s): General (No Natural Resource)

Disposition: Resolved: Comment acknowledged; does not provide new information

As a frequent user of the Plumas forest, I urge you to retract this ill-considered proposal.

Letter 102

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

On a personal note, I would like to say that when I lived in the State of Washington, some of the most memorable times were spent in wilderness areas where no motors were allowed. This was enjoying nature at its best, and I encourage us to keep what we have of this blessing and not corrupt it by allowing the devastation of so-called civilization.

Response

Your comment has been noted.

Letter 103

Attributes

Attribute	Value
Early Attention	None

Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Decisionmaking Philosophy

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The bottom line is…our focus needs to be away from unnecessary oil-based transportation in our National Forests and towards more eco friendly (foot) traffic.

Response

Your comment has been noted.

Letter 104

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Opposition (suspend/stop)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

When I'm backpacking, I don't go out there to listen to the roar of vehicles.

Response

Your comment has been noted.

Letter 105

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Opposition (suspend/stop)

Resource(s): Air Quality and Noise

Disposition: Resolved: Comment acknowledged; does not provide new information

Quiet is part of the wilderness experience for myself and my family. This proposed plan sounds like more of the former administration's idea and less like sound environmental policy.

Letter 106

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

There is nothing more discomforting to the heart, mind, and soul when enjoying the great forests and their wildlife inhabitants, than the noise and smell of some polluting bastard on an ATV, or motocross motorcycle tearing up the landscape and disrupting the quiet of nature. If you are hell-bent on increasing the number of miles for off-road motorized use, please issue hunting tags so the rest of us can go shoot these uncaring bastards and do the rest of the public a great service.

Response

Your comment has been noted.

Letter 107

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

As and OHV user and a hiker I object to the proposal to add roads and motorized trails!

Response

Your comment has been noted.

Letter 108

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

As a native Californian, I'm concerned about preserving our forests. I'd like for my kids to continue to enjoy them like I have. Hopefully someday my grandkids will also know our forests the same way.

In order for this to become a reality, we've got to protect what we've got.

Response

Your comment has been noted.

Letter 109

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Please consider the natural inhabitants of the Plumas National Forest and keep ORV's in designated, private areas where they belong.

Response

Your comment has been noted.

Letter 110

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Please, no more vehicles in our roadless areas. Some of us want to escape traffic of all kinds and preserve what we have left.

Response

Your comment has been noted.

Letter 111

Attributes

Attribute	Value

Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Why do the Tax Payers have to plead with government agencies to quit destroying our forests, wildlife, oceans and what little is left of what use to be a beautiful planet?

All of you agencies are proving to be a waste of our tax dollars while destroying what little is left to pass down generations to come.

Response

Your comment has been noted.

Letter 112

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Construction and maintenance

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

I've seen that poorly maintained roads increase erosion, which is bad near delicate environmental areas. So this proposal seems like a bad idea.

Response

The full length of each proposed trail was field surveyed. Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in Appendices F, G and H of the Soil and Water Resource Report.

Letter 113

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

There is already way too many miles of roads and trails in the Plumas National Forest. The Forest Service needs to reduce the amount of miles of road, not add another 364 miles!

Response

Your comment has been noted.

Letter 114

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Goals and Objectives/LRMP Consistency

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Are you a holdover from the previous administration? Is this action you've taken consistent with the stated policy of the traditional Forest Service, or simply another anti-environmental attack upon public lands as executed by the previous public scoff-laws in the White House?

Response

Your comment has been noted.

Letter 115

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

In today's economic climate, it is unconscionable to me that we spend money on new roads in a National Park when we haven't the money to even maintain the existing roads. This money can be much better spent.

Response

Your comment has been noted.

Letter 116

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Opposition (suspend/stop)

Resource(s): General Ecological

Disposition: Resolved: Comment acknowledged; does not provide new information

I am shocked that I have had to write on such a matter. I do not believe the suggestions made here have followed neither the letter nor the spirit of the law. I ask that they be withdrawn before those using such roads can damage this vital eco-zone and its magnificent recreational areas, set aside for their use by responsible adults, not for those who are using road building in these areas as a stalking horse for future forbidden and potentially disastrous pollutions, misuses and needless destruction.

Response

Your comment has been noted.

Letter 117

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

My family uses the Plumas National Forest trail system for recreation. The closure of these trails would be devastating for us. Please keep these trails open so we can continue to enjoy the outdoors.

Response

Your comment has been noted.

Letter 118

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

The negative impacts of Off Road Vehicles on the quality of experience most citizens seek in our National Forests are painfully obvious and extremely well documented i.e. It has become almost impossible to record bird song for example without motor sound in the background. On a personal note: many a time have I been studying wildlife in Plumas wilderness areas and been abruptly and rudely interrupted from these studies by the roar of fast approaching off road vehicle. The implications of this situation are a sad and profound statement on the current

attitudes towards our national treasures.

The existing road system in the Plumas Forest is extensive and while well used plenty adequate for the dwindling population of off road vehicle enthusiasts that pursue them.

Response

Your comment has been noted.

Letter 119

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

I am a resident of Nevada County, where for more than 30 years we have dealt with the abuse of OHV's on our private properties and roads. The noise on a busy weekend can sound like a war zone.

I am also a resident of Plumas County. Plumas is a treasure not to be spoiled by OHV's moving up the mountain. It would be a travesty to increase the number of OHV trails. Plumas is already so dangerous a location for fires that I could barely obtain fire insurance this last year. Please do not allow more OHV's in this beautiful forest.

Response

Your comment has been noted.

Comment 7

Action: Traffic control and safety

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

OHV'ers will be using Highway 89. Our experience with OHV types is that they are fast and reckless drivers. We do not need that added danger on a 2-lane Highway.

Response

Your comment has been noted.

Letter 120

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

As an avid outdoors and responsible off-road vehicle enthusiast I must protest against this proposal. Too many areas have already been subject to serious damage by the misuse and neglect of 'weekend warrior' off-road vehicles, allowing more land for this purpose will only increase the amount of damage and cost associated with this activity. The amount of sites current is already enough to serve the state's needs.

Response

Your comment has been noted.

Letter 121

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Opposition (suspend/stop)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Stop the massive destruction of our forests and parks. Allow the natural habitat to exist as their clean, quiet and peaceful environment. Vehicles to not belong in these protected areas and should be stopped immediately.

Response

Your comment has been noted.

Letter 122

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Please be mindful of the fact that OHV use is, by its very nature, exclusionary. There are multiple users of our national forest lands, and most of them have little or no impact on one another. OHV use wrecks opportunities for using the forest to seek peace and solace, for studying natural history, for art or photography, for recreational hiking, and so on. Approving OHV use, privileges one class of forest users over all the others.

Response

Your comment has been noted.

Letter 123

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested

Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Keep those noisy polluting vehicles out of my forests, enough is enough.

Response

Your comment has been noted.

Letter 124

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

There is no question that ORVs are destructive, noisy, and dangerous. It's also understood that "man" loves the danger and is very willing to shell out "big bucks" to purchase and use, legally or illegally, these machines in areas particularly where they are prohibited from use. So: When will those in power to do so inhibit the lengths to which man continues to destroy and at the least, protect that which is still pristine?

Response

Your comment has been noted.

Letter 125

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We must stop paving the planet! No more roads and no more off-roading, please!

Response

Your comment has been noted.

Letter 126

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Off the road vehicles don't need to be everywhere. Limits are good for all of us. Please protect the forest!

Response

Your comment has been noted.

Letter 127

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Forest Service people need to get out and spend some time on weekends where ORV's and ATV's are in use. You will discover (in case you don't already know) that the roads are not adhered to, plant life is totally smashed and uprooted, and no birds or animals will be sighted or heard! Why? Because of the destructive nature of this type of activity! Instead, dirt and dust will be everywhere. Trails will be widened and eroded and going everywhere, including places that are supposed to be off limits! Wildflowers that once bloomed in the area will be trodden under foot and wheel and gone forever! Not even a Steller's jay or a bunny rabbit or coyote will be seen or heard due to

the excessive noise and destruction! Why on earth are you even considering increasing this kind of activity in land that belongs to all Americans, not just the vocal rabble-rousers and noisemakers who like to go fast and roar through our beautiful forests and ruin everything for the rest of us?

Response

Your comment has been noted.

Letter 128

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As a visitor to our National Forest System, I would like to see less use of our forests by dirt bikes, jeeps, and all terrain vehicles.

Response

Your comment has been noted.

Letter 129

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Ecosystem Emphasis

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Please reconsider a plan with more long range consideration of environmental and social impacts on the on the existing NFTS.

Response

Your comment has been noted.

Letter 130

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Our wilderness losses in California and the greater U.S. are already notable and readily noticeable. Please—help us as a people to maintain what we still have, for those who follow after.

Response

Your comment has been noted.

Letter 131

Attributes

Attribute	Value

Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Protect National Forest lands; don't give it away to off-road self-interest groups.

Response

Your comment has been noted.

Letter 132

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Especially in this era of "green" environment, it is positively deadly to allow noise off-road vehicles. How can the forest service serve the real outdoorsman with noise for both people and endangered and other animals? Shame on you.

Response

Your comment has been noted.

Letter 133

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Enforcement/Funding/Staffing

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Please do not consider this in these times of little or no budget for it.

Response

Your comment has been noted.

Comment 7

Action: Add more mileage to System/do not decrease mileage

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please legislate to control and maintain the existing miles of roads and motorized trails.

Response

Your comment has been noted.

Letter 134

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+

Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

In this time of economic crisis, how can you justify building more roads for motorized vehicles? Rather than use this money to degrade the forest, why don't you improve, enhance, and upgrade existing facilities?

Response

Your comment has been noted.

Letter 135

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am an avid hiker and do not want to hear or smell motorized traffic when I am in the forest. I, and many people like me, go to these pristine areas to get away from the trappings of civilization. The last thing we want is for the trappings to follow us to our refuge. Stop the encroachment of these vehicles!

Response

Your comment has been noted.

Letter 136

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Air Quality and Noise

Disposition: Resolved: Comment acknowledged; does not provide new information

The air in National Forests does not need to have any more pollution and CO2, nor any more noise or trash. No more roads please.

Response

Your comment has been noted.

Letter 137

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: General Action (protect/save/do not destroy)

Resource(s): Air Quality and Noise

Disposition: Resolved: Comment acknowledged; does not provide new information

Enough is enough. I want quiet and pristine environment in our National Parks.

Response

Your comment has been noted.

Letter 138

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	None

Comment 6

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

As a former "Motor Head" I totally understand the desire to "crank the throttle". However I am totally opposed to the ever-expanding assault of motorized activity in our parks, wildlands and protected areas. Oil and Water do not mix!

Response

Your comment has been noted.

Letter 139

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

I feel that by closing all these OHV roads we are opening up our self to a major chance for fires to spread vary quickly and without the roads there for us to fight them. Then the fires will grow and reap that much more devastation on our homes and town.

Response

Your comment has been noted.

Comment 11

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please think about what we are doing for our children. We are to make it better not worse; by closing the forest we are not helping the problem, but creating more problems deal with the OHV riders in a different way.

Response

Your comment has been noted.

Letter 140

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I am particularly upset at the closure of the road to the back side of Smith Lake last fall, as that is where my mother and father's ashes are scattered. My older brother doesn't get around as well as he used to, so he may have had his last visit to his parents final resting place He is understandably incensed. I am as well.

Response

This motorized trail has been reopened.

Comment 2

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

If I understand correctly, the justification for the road closures is to prevent human caused environmental damage. I hiked back there last December and saw far more damage from the equipment the Forest Service used than the local population incurred in the last 35 years. There are more skinned up trees there now than was caused by the last logging operation.

Response

Your comment has been noted.

Comment 3

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Denying access to the forest for handicapped individuals serves no purpose. To deny large areas previously accessible to hunters, campers, firewood cutters and recreationalists only creates hostility. Loggers built these roads years ago that cost the FS nothing to maintain, and serve as fire breaks and access to fires when they do occur. Closing them costs a substantial amount of taxpayer money that cannot be justified, especially in these troubled economic times.

Response

Seniors and disabled persons may receive a permit from the District Ranger allowing a one time cross country game retrieval allowance. Fire personnel will be able to use any road, trail or unauthorized route they need for fires access. Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger. Routes that are not designated with this project may be added at a later date as no routes will be decommissioning with this project.

Letter 141

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I agree that FS system road need to be included in the analysis. It is essential that all roads be considered for repair or decommissioning as part of this proposal. We have too many roads already. Adding more, for OHV use, without closing other is simply too much impact to the extremely important watersheds and species of the Plumas National Forest.

Response

Your comment has been noted.

Comment 2

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Deer Herd routes need to be protected from excessive roads and OHV use. We are loosing the abundant deer we had in Northern California. This is a travesty for our state. We have lost our salmon runs; will we loose our deer herds also? It is also essential, as Stephen notes, that the OHV routes completely avoid wilderness and any Habitat Management areas set aside for sensitive species such as California Spotted Owl, American marten and Northern Goshawk. There is a new connectivity model for marten available for the Lassen National Forest and I assume there is one being developed for the Plumas National Forest. This connectivity model shows areas that are important for old growth species and their habitat needs. As many roads as possible should be decommissioned in these areas and no new routes should be permitted.

As development grows on both sides of the Sierra range and mountain communities expand wilderness and quiet/wild areas are more important than ever for recreation and wildlife value. The effect of widespread clear-cutting is also having an impact on species that will simply not be able to live in clear-cut forests. Our National forest will be their
refuge for the future.

Response

Effects to Mule Deer were analyzed and can be found in section 3.7.24.1 of the FEIS. The action alternatives (2-5) do reduce impacts from routes and trails to Deer Herd ranges when compared to Alternative 1. For example, Table 95 discloses the miles of unauthorized routes (Alt. 1) and proposed (Alt 2, 4, 5) or existing trails (Alt 3) that occur within Deer Herd Ranges. Looking at the Sloat herd for summer range, Alternatives 2, 3, 4 and 5 reduce miles of route compared to Alternative 1 by proposing 87 miles less under Alternative 2 to 184 miles less under Alternative 3.

The Marten Connectivity Model has not been completed for the Plumas NF. In lieu of that model, the Plumas National Forest evaluated connectivity by using its Draft Carnivore Network Tool, in addition to evaluating impacts to late successional stage habitat and Old Forest Emphasis Areas. Please see the Terrestrial Wildlife Section in the FEIS for an analysis of effects to Marten Connectivity. In addition, the Terrestrial Wildlife Section of the FEIS also discloses impacts to the California Spotted Owl and Northern Goshawk.

The effects of clear cutting or logging on adjacent private lands have been considered in the cumulative effects section of the FEIS (Appendix C) and considered for species such as the Goshawk, Marten and owl.

Comment 3

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

It is also very important to keep any OHV routes away from the Pacific Crest Trail or any other hiking trail. Hikers and motorcycles/ATVs do not mix! I have personally been disturbed and frightened by motorcycles on single track hiking trails where OHVs were prohibited.

Response

Your comment has been noted.

Letter 142

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: See Chapter 2, FEIS, FSM 2670

Alternative Selection should be based on sound science and field survey. To not include certain trails due to potential for certain species habitat, is not sound science. Now, if there was evidence that certain species existed that is one thing. A reroute could possibly help in this situation, but closure due to a potential opens Pandora's Box. Just because the motorized route is not there does not mean that i.e. fisherman will not access certain creeks and stomp on the actual species that you are trying to protect. This does not mean mountain bikers or horseman will refrain from using these trails that would have the same impact and this potential habitat.

Response

Suitable habitat, irregardless of species presence, needs to be evaluated for impacts based on policy direction contained in Forest Service Manual 2670 (Threatened, Endangered and Senstive Species).

Comment 2

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Seasonal closure is not active management. Plumas NF provides a vast amount of low elevation forest that could be enjoyed if a wet weather (rain based) closure policy existed. This year is a prime example of how a seasonal closure would have prohibited many families from enjoying the outdoors on day trips or camping overnight late into the winter due to weather that is favorable for that occasion.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist.

Comment 3

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The alternatives selected for study do not provide an OHV recreation alternative. Although Alternative 2 is most OHV friendly, that does not mean it is pro OHV. If the alternatives were not to be altered before selection Alternative 2 would be my selection, but it is far from balanced.

Alternative 5 is in no way a balanced recreation based alternative.

Response

Your comment has been noted.

Letter 143

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I agree, just as common sense, that we don't need 364 miles of "user created routes" added to a system of roads already taxing our forests and wildlife habitat.

Response

Your comment has been noted.

Comment 2

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Climate

Disposition: Resolved: Comment acknowledged; does not provide new information

As the climate changes, we must place more limits on the destruction of our natural resources, especially by automobiles, ATV's and motorcycles. Aside from destroying our forests, cars and their "recreational" off road counterparts have serious effects, as you know, on the raising of CO2 levels, which in turn has changed our

weather dramatically. Imagine: in 1950 there were 50 million cars on the planet---in 1990 about 400 million, and now over 800 million. The automobile contributes almost one third of the CO2 to our atmosphere, and increased CO2is driving our current climate change crisis. Here in California, that adds up to year after year of drought, diminishing coastlines, and more wildfires.

Response

Your comment has been noted.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I urge you to discourage completely the use of ATV's as "recreation." They are an extremely destructive recreational activity that further aggravates our current environmental crisis, adds to CO2 levels, and destroys the forests. They do nothing but encourage the destruction of our natural environment, at a slightly more rapid pace.

Response

Your comment has been noted.

Letter 144

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I am thoroughly disgusted with the way the Plumas National Forest has handled this issue. I do understand the importance and timelines they are under, but I have listened to their comments and can't tell which side of the mouth they are talking out of and why they constantly change what they are saying. I would truly like to know which plan they are opting to go with so that the public (that they are supposed to be serving) would be able to spend their time appropriately helping them instead of beating our heads against a brick wall!

Response

Your comment has been noted.

Comment 2

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to mention that the Forest Service has made decisions to remove roads with out actually going out into their forest and driving or inspecting these roads. It is a sign of their ignorance of their own forest when the public has to show them roads in their forest that are not on the map, and roads being removed go to some of the most beautiful sights in North America (the river at the Spring Garden Tunnel being an example). I would suggest that the Forest Service spend more time out in their forest, actually mapping the roads and trails. Spend time learning locations, designations, and sites. Then they can make an educated change to their system.

If the Forest Service plans to close certain roads for seasons, they need to be able to determine the appropriate times to close these roads. How can they determine that when they don't know about these roads to begin with?

Response

Your comment has been noted.

Comment 3

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am strongly objecting to the rule to allow parking only one vehicle length off the road. We have used this forest for ATV use for over 30 years. We enjoy going out and parking in large open areas and riding in the forest. We are now being confined to certain areas. It is absolutely ridiculous to think we could load up (32' motor home and 20' trailer) every day to go riding (and hopes that are camping site are still open to return to!). We have always left the area we camped at cleaner, neater, and safer than when we arrived (more than we can say for the forest management!). You need to consider leaving more areas open for parking/camping/ use of the forest. Especially since you have closed so many of your ATV accessible campgrounds (Grizzly at Bucks Lake and Crocker at Clover Valley). We would not object to being the party responsible for opening/closing these sites for the year to be able to use them (as have had to clean the roadway to use Grizzly before!).

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Letter 145

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: General Action (protect/save/do not destroy)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please keep our trails open...this is our land and we want to share it with our kids as our fathers shared with us!! Pretty soon we will have no outdoor recreation left in this country. We are the ones who volunteer, maintain and use it.

Letter 146

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

As a frequent recreational user of the Plumas National Forest, I am surprised and dismayed to learn that access may be reduced for off-road vehicles. My young son and I have enjoyed many weekends riding and camping in the Plumas National Forest. One of the reasons we choose Plumas over Tahoe or El Dorado is that it remains relatively un-crowded and unrestricted. While we enjoy the lack of restriction, we understand that this is a privilege and we are mindful to ride respectfully so as to preserve these privileges for ourselves and for other like-minded users. While the routes prescribed on the Summer OHV Map are enjoyable and worthwhile, I know I will greatly disappointed if my use of the Plumas National Forest is reduced to only those routes.

Letter 147

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested

Request Information	Other request for specific information

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please rest assured this closure benefits no one. These trails and roads have been in use for over 100 yrs by walking, horseback, motorized, and bicycles.

No one needs this area closed for any reason except your lack of wanting to expose public land to all people of the public. Not as an exclusionary area that keeps a large amount of people out.

Response

Routes that are not designated with this project may be added at a later date as no routes will be decommissioning with this project.

Comment 2

Action: Public Involvement

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

With myself owning property on 510 Milsap Bar Road and not getting any notification is very sneaky on your part please notify by mail all Plumas co. /butte co some people in this area do not have internet access. Please keep me posted. It would have been nice to know that the public comment meeting could have been attended in person.

Letter 148

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please don't close any more roads in Plumas Forest. My kids have grown up riding our forest and I hope to do so with my grandkids. I'm an avid pack backer and can reassure you that there is plenty of forest already locked up and unavailable to most Americans. Nobody could possible see all the wilderness we already have set aside and unreachable by most.

Response

Your comment has been noted.

Letter 149

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Disabled and elderly use

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please don't close these trails as a handicapped person I rely on my trusty jeep to get me and family into these beautiful places. Without the jeep my respiratory condition limits me [to] campgrounds that are car accessible.

Letter 150

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

Closure would create tremendous financial difficulties to our Company. We pay taxes, and ask very little in return.

With unwarranted and unfair restrictions we will be forced to shut down our operations.

Response

Your comment has been noted.

Comment 2

Action: Enforcement/Funding/Staffing

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

With more and more people using the already limited riding areas, why should we fund the OHV riding fund with our already doubled OHV Registration fees?

Response

Your comment has been noted.

Letter 151

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

After reviewing the DEIS alternatives that have been proposed for the Plumas National Forest I have many concerns. My first concern is that 700 miles in the 3rd alternative alone. Each of these alternatives also propose a seasonal based closure much like the disastrous El Dorado National Forest plan taking place as we speak. Instead of the seasonal closure I would recommend leaning on the models created by the Mendicino and Georgetown ranger districts that have imposed rain based closures. I am an avid motorcycle rider that also enjoys dispersed camping, after reviewing the routes I found that many of my families and friends area's are now only accessible by the most fit of humans. I also believe that the private land owners where some of the trails reside should have the right to make the decision if they would like to continue the access or not. This leads to my overall concern of the loss of trail looping opportunities that in the past have allowed us access too many beautiful locations and keeps concentrated usage down.

Response

The season of use has been increased for the French Creek and Concow areas with a stipulation that the areas could be closed based on rainfall events. The motor vehicle use map requires specific date ranges for trail needing seasonal closure.

Letter 152

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I think that by removing so much of the already inventoried trail is a bad decision that will end up costing more to enforce the closure than it would to enforce proper OHV usage.

Response

Your comment has been noted.

Comment 2

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe that to make a decision based upon looking at a map is ridiculous and really should be assessed by visual inspection of these trails.

Response

410 miles of routes were surveyed for resource impacts. No routes will be decommissioned with this project and additional routes can be surveyed in future projects.

Comment 3

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have been a large part of keeping these trails maintained by organizing work parties and picking areas that need the most help. The majority of the trails in Plumas are for the most part very well taken care of, mainly by the users of these trails.

Response

We hope that will continue in the future.

Comment 4

Action: Classification

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

One other main concern of mine is that if we close all of these trails, is what impact will that have on the OHV community? This impact will definitely hurt the economy of many types of businesses, not just the OHV based businesses. The OHV community has already taken so many hard hits this past year with all of the ORV/OHV park closures throughout California.

Response

Due to limited OHV use on the Plumas National Forest, a social economic impact analysis was not completed for this document.

Comment 5

Action: Alternatives General (add, change, delete)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to request on the behalf of the OHV community that all existing inventoried routes be added back into the DEIS alternatives.

Response

Your comment has been noted.

Letter 153

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have a vested interest in keeping the OHV trails open in Plumas County. I do ride dirt bike motorcycles on the trails as well as use my jeep with my family.

It would be a shame to take away not only from my family but from all the families that we are getting to know in Plumas County that ride too. This area was a huge draw for me and my family, because of the fishing, boating, camping, hunting, hiking, and of course the OHV areas. Please reconsider, the closing of Plumas County as a fellow land owner and motorcycle rider in the Buck's Lake area.

Response

Your comment has been noted.

Letter 154

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email

Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Enforcement/Funding/Staffing

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Green Sticker Fund was put into place to help offset the costs of maintaining the OHV trail system in a responsible manner. As long as this funded program remains in place and is actually used for this purpose we can maintain a shared use of the public lands with minimal damage and fun for all.

Letter 155

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please keep the Plumas trails open to the public. It's a great family activity to ride there and we do not want to lose this precious asset.

Letter 156

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I do not support the closing of trails in the Plumas Forest.

Letter 157

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I support an alternative that designates all of the existing routes that currently exist on the ground of the PNF.

Letter 158

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I urge you to keep the Plumas National Forest trails open – all of them.

Letter 159

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

It has come to my attention that up to 1100 miles of forest trails and roads in the Plumas National Forest are subject to closures to OHV and ORV traffic. As my family and I are avid ATV riders, I find this proposal to be both unnecessary and offensive. This is a personal attack on me, my family, and thousands of other OHV enthusiasts brought on by people who do not share common interests with us. It is my belief that they don't care to enjoy the forest – but don't want "us" to be able to enjoy it either. There has got to be a middle ground between all parties involved.

Comment 2

Action: Enforcement/Funding/Staffing

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

In hard economic times such as these, it simply amazes me that we continue to throw good money after bad at a "potential" problem that doesn't even exist yet. These monies could be better spent on maintaining existing trails and forest roads, instead of appeasing a minority group whose only goal is to take another outlet from hard working, OHV fee and tax paying citizens with the same rights. OHV fees collected are essentially paying the salaries of Forestry personnel to maintain these trails, and by shutting these trails down it is my opinion that a large number of riders will stop registering their OHV's and riding in California. This could potentially cut off any revenue from these fees. To my knowledge, hikers, backpackers and horseback riders are fee to use these trails without paying the same fees that OHV and ORV users incur – I've never seen a horse with a green sticker on it.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The overwhelming majority OHV enthusiasts are respectful of the trails we are allowed to use. Of course there are

exceptions, as with any large group but it's not fair to judge the group as a whole because of the actions of a few. There are a number of OHV and ORV groups who donate time and manpower to not only maintain trails, but help clean up those same trails due to the carelessness of others.

Letter 160

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please do not take away even more OHV roads/trails from public use.

Letter 161

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

How many of our public lands do they need to close? I am tired of the liberal minority wagging the dog and shutting down millions of acres of public land for no reason. This land will show no scars in such a short time and no one will be there to even notice! Without the trails access to these areas will only be utilized by such a small minority. What a waste of our public lands…stop the madness!

Letter 162

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

My family would like you to reconsider the closing of any OHV trails in the forests. Off highway motorcycling is one of the best family recreational activities that exist. It is extremely hard in the U.S. to get enough time off the hike or mountain bike all the scenic areas that can be seen in one day on a off highway motorcycle. The sport brings and keeps the family together. My wife and children, along with the other families are nothing but smiles when it comes to trail riding. They are not interested in racing at all. Casual trail riding with a picnic lunch is what my wife and kids look forward to every weekend.

As we see more and more trails being closed, it is making the existing trails much more crowded which equals trails that are not quite as safe for our young children. Besides that, it also requires much more maintenance to keep the trails in pristine condition which our family volunteers for throughout the year to help the Forest Service.

There is no reason that the Forests and the trails cannot be shared by all tax paying U.S. citizens that also

dedicate their own time to maintaining. There is no benefit from closing existing trails just to close them. Trails can be rerouted if erosion is the problem. You will find many trained volunteers in the local motorcycle and mountain bike clubs that would be happy to do the work of keeping trails open so that all people can use and enjoy them. There are not many sports out there that are as family oriented and let's you see the scenery that is possible as in OHV riding. The trails in the Plumas Forest are as beautiful as any in California or the United States.

Letter 163

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please fight for the people that are paying taxes and enjoy the land use. Our family enjoys camping and ATVing and hate to see any legislation that closes land use by the public. We should be opening more land for the people to enjoy. And by enjoying I do not mean destroying. True ATVers are the people taking care of the trails and open areas.

Letter 164

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please keep trails and roads open to OHV access. This is a good family sport where I can take my kids out to see land they could never access on foot. Existing trail/road systems help to keep people out of protected areas but still give access to all.

Letter 165

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 2 (Proposed Action Alternative)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I support the "Alternative 2 proposed action" of the OHV Route designations DEIS.

Letter 166

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Request for full CD version of Planning Document

Letter 167

Attributes

Attribute	Value
Early Attention	None

Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

While I agree there needs to be some limitations, the 5 proposed alternatives are far from fair to any party desiring change.

Proposal 1 doesn't address areas where environmental damage is causing real problems. And the other 4 proposals fall way short of meeting the needs for the public at large. I don't think any of these proposals are any good. I don't think you have considered the enforcement of proposals 2-4; you don't have enough resources to enforce the current situation.

You are charged with the protection of our forests and this is the best you can do? I fear that we do not have impartial representation.

The comparison here is to take a lake and restrict water skiing, fishing, sailing, or the boating of any kind to 10% of the lakes surface, leaving the other 90% open to…what?

I don't think this is fair or just.

You need to go back to the drawing board and find an alternative that will fairly address all parties concerned. But, given these are my choices, I would have to go with Proposal 1, do nothing. That at least protects my rights to access the "Public" lands and doesn't bow to special interest groups.

Letter 168

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Tribal Activities

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Seems to me the forest service land would be abundantly healthier if it was put back in the care of the original caretakers. Indigenous peoples were here thousands of years before any American government laid claim to the land with ruthless and violent behavior. It's only been the last two hundreds years that have shown the heaviest devastation to our ancestral lands. No matter what actions are taken in this debate, the natural environment will continue to suffer. Give the land back to the Indians!

Letter 169

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I have been driving around the PNF for 40 years and have never seen any damage to land, roads or trails caused by anyone with a vehicle. There are many more square feet of bare soil occurring naturally in any area than there is in roads and trails made by man. If you stupid fascists would remember back to your most basic natural science class you would know mountains are constantly raising up and being eroded away. What do you think made all of the great valleys in California or the world? It is part of the Earth's constant evolution. It always has been and always will be. All you Communists are doing making the public's life on the planet a little more miserable and restricted. This land is my land too. There are millions more of miles of bare earth deer trails with exposed earth in this forest than there are tire tracks or even reads. You can't show me where there is any permanent damage to any thing in the forest. I am not calling for hydraulic mining, so don't go there. This crap has been going on for way too long. I am getting damn tired of every time I try to go hunting, fishing, wood cutting or whatever in the forest I am more restricted by you arrogant punks from using my forest, by regulations, blocked roads, trails and gates, signs etc.

Comment 2

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I recently drove through El Dorado National Forest. I could not even find a place to pull off the road and park to go hinting or camp anywhere. Improved campgrounds are the most damaged garbage pits in the forest because of concentrating too many people in one place. If people were allowed to scatter around where they want to go there would be no damage.

Comment 3

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Most all of your "proposals" are in violation of the Multiple Use Act which is still in effect. Why don't you try following it for a change It is the existing law that supersedes any administrative regulations contrary to it.

Comment 4

Action: Enforcement/Funding/Staffing

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I have an answer to all of the budget short comings. Fire all of you dumb idiots and eliminate the USDA and USFS. Also you can tell the Sierra Club those in Washington DC to stay home and out of my forest and it will be fine. It will produce lots of fine water, timber, grass, wildlife and recreation for ever.

Letter 170

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please keep the logging spurs (that are not already gated closed) open to vehicle use. These are needed for firewood cutters, Christmas tree cutters, and for just getting off the main roads. Please do not close these spurs just because it would be too difficult to include them in a map showing approved roads in the Forest.

Response

"According to the Travel Management Rule (36CFR 212), if a written authorization for such activities as livestock operations, mining, logging, firewood collection, and maintenance of pipelines and utility corridors specifically provides for motor vehicle use, that use is exempted from designations and the prohibition regarding motor vehicle use and may continue. The Forest Supervisor retains the authority to regulate uses under a written authorization and to determine whether and under what conditions to authorize motor vehicle use on routes and in areas not generally open to motor vehicle use."

Comment 2

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please allow green sticker vehicle use on all non Forest roadways where not already restricted by the California Vehicle Code.

Letter 171

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I don't agree with any control on use of existing roads in the PNF. Other than roads that have a legitimate problem, non-repairable runoff issues, etc. I certainly don't agree with some of the "specialist" evaluation. As with any other occupation, it takes years of experience to become a "specialist", I don't believe a younger person not very long out of school will have a tendency to err on the side of covering their rears.

Comment 2

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe many of the short, dead end roads should be left open for access to wood cutting and game retrieval.

With wood cutting restricted to right next to the through roads, it will be only a matter of time before there are accidents from felling of fire wood trees vs. vehicles.

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Comment 3

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The proposed road closures are going to limit the ability of the older folks to cut their fire wood, hunt and just enjoy our forest. These older folks have worked, paid taxes, and fought for their country; and to now be so restricted from their forest is a shame.

Comment 4

Action: Classification

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The roads that are to be closed will inhibit fire suppression which should be a high priority with our now non-managed forest.

Response

Seniors and disabled persons may receive a permit from the District Ranger allowing a one time cross country game retrieval allowance. Fire personnel will be able to use any road, trail or unauthorized route they need for fires access. Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger. Routes that are not designated with this project may be added at a later date as no routes will be decommissioning with this project.

Comment 5

Action: Influence of Interest Groups and Politics

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

This whole process appears to be a sham, as I believe the PNF knew from the start what they wanted to end up with. Why even have all the public meetings as the locals don't seem to really have much input, only the organized environmentalist groups; the majority of which have never set foot in the PNF, have impact on what is done with our back yard.

Comment 6

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Being a sixty six year resident of the Quincy area with thirty seven years working in the timber industry, I know most of these roads were established by the USFS to facilitate timber harvest contracts, others for use by legal mining activities. I'm sad to see the closure of these roads.

Response

The majority of inventoried routes were constructed in timber sales as temporary roads or skid trails. They were not intended to be used in the future, used only for a short time frame. Many routes have also been created my users by repeated use on routes outside of timber sales.

Letter 172

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Roads and Trails (incl. access general)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

No trail closure is acceptable. Americans are taxed to pay for public lands and we are entitled to use public land, all of it.

Letter 173

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have a specific concern with analytical omissions from the DEIS:

As an OHV enthusiast I prefer the maximum number and miles of sustainable routes. I understand that some areas are more fragile than others and that any route must be sustainable, but there is a fundamental maxim that applies: the more miles available, the less annual mileage on any given trail. Perhaps I missed it in the 459 pages, but I don't see this fact addressed in the DEIS. If you confine, say, 10,000 annual OHV/miles to 251 "new" route miles (Alt 5), any given route mile gets 40 crossings. If you expand those same 10,000 annual OHV/miles to 364 route miles (Alt 2), each route mile gets only 27 crossings. Obviously this is a simplistic analysis of a more dynamic reality but I am surprised it is omitted from consideration in the DEIS as, all things being equal, it should be a fundamental consideration. Under Alternative 2, environmental stress to any given "new" route mile resulting from annual cumulative OHV presence would be 31% less than that expected under Alternative 5.

Response

Due to the expected low OHV use on the Plumas National Forest, it is expected that trail use between alternative 2, 4 and 5 will be insignificant.

Comment 2

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have a specific concern with analytical omissions from the DEIS:

2) The same analysis applies to public safety. OHV riding is inherently dangerous, but head-on encounters are the most common cause of severe traumatic injury in confined riding areas. Spreading people out helps mitigate the danger - the more route miles available, the safer the trails. Concern for the safety of threatened animals and vegetation is heavily weighted in the DEIS, but concern for the safety of OHV enthusiasts is inadequately addressed.

Response

Due to the expected low OHV use on the Plumas National Forest, it is expected that trail use between alternative 2, 4 and 5 will be insignificant.

Comment 3

Action: Volunteer Groups and Partnerships

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As a former member of the Houston (Texas) Trail Riders, I learned first-hand just how responsible OHV activities complement and enhance the stability and management of public lands. We worked hand-in-glove with Rangers from the Sam Houston National Forest on such projects as quarterly Forest Cleanup Days, mitigation of stream bed and bank disruption utilizing concrete and wooden corduroy crossing stabilizers, observation and reporting of nesting sites for the endangered Red Cockaded Woodpecker, and observation and reporting of Pine Beetle infestations. In short, we were actively involved in helping the Rangers maintain the national forest for everyone's enjoyment. In all the instances noted above, the trail riders group was proactive in these endeavors and did not pursue them as a result of outside pressure or lawsuits initiated by cocktail-party environmentalists who never actually set foot in the forest. We considered it our forest, and we took care of it as such. Accordingly, we recognized and embraced the necessity of restricting OHV activities to existing, maintained trails and discouraged cross-country riding even though the flat, open terrain easily facilitated it.

In the Plumas National Forest, the same scenario could unfold. The Paradise Ridge Riders and other area OHV groups have carried much of the load of finding, identifying, clearing, maintaining and mapping the routes identified in the five DEIS alternatives. As this process gathers momentum, we intend to continue to work hard to enhance and maintain this trail system for future generations. I am hopeful that our local OHV groups can enjoy the same level of close cooperation with the Forest Service that we had in Texas, and that the Forest Service will be more proactive in approaching regional OHV groups to elicit their support, cooperation, time and manpower to meet the needs of forest management. I think you'll find that OHV groups are eager to help and are willing to provide sweat equity to achieve specific goals that might be more difficult to achieve by Forest Service personnel alone. Identify an issue, and we will come. I am hopeful that the new and substantial OHV trail maintenance funds provided by the Economic Stimulus Act of 2009 will be applied in such a way to take advantage of the explicit and dynamic partnership between the Forest Service and OHV enthusiasts.

Letter 174

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am an avid outdoor person with a nice clean Jeep that is a registered on highway vehicle. I would like to state that I request you allow Tread Lightly members to continue to use this area of our natural resources. We do not pose a threat to the area and are extremely aware of proper land use and attempt to continue to maintain it in the highest possible condition at all times. Please keep our land, our land and allow us to utilize it and enjoy it with our families in a clean and respectable to nature manner.

Letter 175

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Yes I liked 5 also. But allow the ability to add new trails.

Letter 176

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Legal Consistency General (E.g., democracy/welfare/public good)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It's very hard for me to believe that the USFS can legally close off access to the Plumas National Forest. Public land that is being closed to the public seems that this would be illegal and the government should be taken to court. I would think that cutting off access for fire suppression, hunting, getting fire wood, Christmas trees and just enjoying the forest would be a citizens rights, guess I'm thinking about a few years ago when this was still America. I know that the USFS employees also use the Plumas and wonder why they go along with what's going on. Hope some of these proposals can be stopped.

Letter 177

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternative 5 looks to be best choice for us. I do wish there was RV camping that a person could ride to some of these trails from.

Letter 178

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Thanks for your time in discussing my concerns for the area around d Homer, Lost and Dear Heart Lakes. Though all but the northern half of Homer Lake is shown on the USGS topo as north of the Plumas Lassen NF boundary, my concern is about the access from the Plumas side via the Hauns Meadow lake road, which crosses the ridge at the east boundary of section 14 into Mountain Meadows drainage. Historically there was a trailhead from the saddle into the lake and occasionally, in the 50's, jeep would access the lake from there. I note from your comments that this general area is designated, at least, as restricted motorized. I would hope that, if this is the case, appropriate means would be employed to assure that this area is protected from unauthorized motorized vehicle use.

I am aware that the three lakes are more easily approached from the Lassen side, as they were historically, via a road to a trailhead in the vicinity of Dear Heart Lake. However, as it has been a long time since I have visited the area, and I am unaware of the situation there today, and I am getting a little to old to check it out (83). I intend to comment on the Lassen plan when it is published.

Comment 2

Action: Alternative 4 (NR protection and CIRCAs)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

In general, I favor Alternative 4 as, with all the compromises considered, it best insures the greatest amount of environmental protection. In this day, with so many impacts by extracting industries as well as motorized recreation interests etc. upon the remaining, largely un-entered forest lands, I believe we should be emphasizing protection and preservation over "expendable" uses.

Letter 179

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am most concerned about losing opportunities to camp further than one vehicle length off road, and only off designated roads. There are campsites that people have used for generations that they won't be able to access any more. This is part of their heritage and I am disappointed that the Plumas NF and Alice Carlton have no respect for family heritage. I don't think they were led to believe it was all about motorcycles and quads in the woods. Now you've added camping and woodcutting and hunting. The USFS didn't request the public to tell them where they want to camp. And some of us don't necessarily know where we want to camp until we get there and find a nice spot. You're taking our land away from us.

Response

The Plumas National Forest will not restrict use of dispersed campsite off system roads and trails when parked no more than a car length off a road or motorized trail. See section 2.4.2 Designate Areas for Dispersed Camping.

Letter 180

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 1

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We oppose the notion in your Proposed Action of opening 364 miles of unauthorized user-created routes to ORVs. That would seriously damage the future of this national forest and its values to the public for outdoor recreation. With the growing population in California, more and more people living closer to the PNF, this is the time to curtail ORV routes, not sanction unauthorized routes.

Comment 2

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS mentions extensive construction work the FS would have to undertake to bring the unauthorized routes into compliance with standards for drainage and erosion resistance. Instead of taking on this added workload, we think you should use the same effort to catch up with the maintenance backlog on existing NFTS routes.

Response

This work will be completed by volunteers with funds from grants.

Comment 3

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

We favor Alternative 3 because it closes all unauthorized routes. This alternative best protects the health of the forest, its wildlife and fish habitat, and its clean water production. It avoids adding new construction and maintenance commitments. In your Table S-3, Alternative 3 appears as the top-ranked alternative for 8 of the 9 resource topics analyzed, showing that it is clearly superior to other alternatives.

Comment 4

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

We urge you to incorporate these points in the final decisions:

Close all ORV routes within Inventoried Roadless Areas, including Feather Falls proposed wilderness; proposed Wild and Scenic Rivers; and all mountain meadows.

Response

The Plumas National Forest is not proposing any new trails in these areas.

Comment 5

Action: Other/Unspecified

Resource(s): Soil Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

We urge you to incorporate these points in the final decisions:

Reject the proposed Sly Creek open area of 36 acres. Such open areas always become a source of sediment, and they are a permanent scar on the land.

Response

This area will be mitigated for watershed sediment concerns. It is an old borrow site for the Sly Creek dam and will remain a permanent scar on the land whether the area is designated for OHV use or not.

Comment 6

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We urge you to incorporate these points in the final decisions:

All native-surface routes should be closed throughout the Plumas National Forest during the winter season. Seasonal closures should keep ORVs out when the ground is saturated by snowmelt or rain.

Response

This document is only dealing with designating system trails. In most cases, snow determines when motorized trails are available for use.

Comment 7

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We urge you to incorporate these points in the final decisions:

Restrict dispersed camping to one vehicle-length from the edge of the route, so ORVs do not create still more unauthorized spur routes.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Comment 8

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We urge you to incorporate these points in the final decisions:

Install locked gates and other physical barriers to keep ORVs out of closed routes. It is well known that some scofflaw 4-wheelers will not comply with regulations and signs. Gates are an effective way to obtain compliance, used widely by the Forest Service and other state and federal land management agencies.

Response

The Plumas National Forest has found that gates are hard to maintain. Roads that are intended to be closed to travel are typically decommissioned to discourage use.

Comment 9

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The draft plan fails to comply with the FS regulations at 36 CFR 212.5 (b), which require identification of the minimum road system needed reflecting a science-based analysis and identification of roads that are no longer needed. We believe the final plan should close all unauthorized user-created routes. The DEIS contains only a flimsy justification for 364 miles of routes, mostly spur routes leading to campsites or serving only ORV riders. The routes do not meet the test of the minimum road system needed. Many national forests have closed such spur routes and restricted camping to an arrow corridor along the road.

Response

These roads are part of a designated road system and are within an area that meets all requirements of the National Travel Rule. Revisiting the actual route designations is outside the scope of this decision. The final rule requires responsible officials to recognize rights of access in designating roads, trails, and areas (§ 212.55(d)). The Department believes that reviewing and inventorying all roads, trails, and areas without regard to prior travel management decisions and travel plans would be unproductive, inefficient, counter to the purposes of this final rule, and disrespectful of public involvement in past decision making existing road management objectives and

maintenance levels, established through travel planning and roads analysis in consultation with State and local governments, already establish appropriate motor vehicle use. The rehabilitation of system roads and trails and user-created routes will need to have a separate environmental analysis with public involvement before any ground isturbing activities are implemented.

Letter 181

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Request for confirmation of receipt of letter

Letter 182

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please do everything possible to keep the OHV trails open. We riders have lost almost everything – we need to hang on to our access to remote areas, like Plumas County.

Letter 183

Attributes

Attribute	Value

Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have never missed a meeting on all discussions of the road closures. I see no reasoning on many of these roads that are going to be closed to us. You go from table to table and see about red legged frogs, all wildlife, which there will be no wildlife to worry about if the Fish and Game does not start to control the Mt. Lion. They are close [to] some roads that will be used daily anyway by the ranchers that have cattle in the area. They are exempt from your closures I understand. You are leaving some roads open that cannot be traveled until June, but I am sure there will be people trying these roads and getting stuck and tearing up the meadows. I think there is a way better solution to this problem without closing so many miles of road. It is too bad that the Highway Patrol has no control over some of these roads. It would be very easy to leave the better roads open to quads if you were required to have a valid drivers license. As most quads state right on them, "Must be 16 years of age to ride". So what are younger kids doing out there on public roads anyway?

Comment 2

Action: Roads and Trails (incl. access general)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

They talk about the environment impact that some of these roads have in certain areas. That is kind of a joke also. Most of these roads have been there for over 60 years back when we had some huge winters. We do not have near the winters as we used to have so really not true about the erosion. The only place that we do have an erosion problem is in the huge burns we are having now days, which was never happening back years ago, because thee areas were logged. Now after it burns the Forest Service will not even log the burns. The private people have logged theirs right away before a loss in revenue occurred. No wonder the Government is broke and in debt so bad. They worry more about spending money then trying to save or make money. If you want a good example of burns replanted just go up above Humbug Valley and look at the private ground and the "Forest Service ground." Private has Redwood, yes Redwood trees that are over 14' high already. That fire was called the Story Fire and I was the one that turned it in and there was no reason for it to expand to the magnitude that it did.

Response

The full length of each proposed trail was field surveyed. Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in Appendices F, G and H of the Soil and Water Resource Report.

Letter 184

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter

Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

I think that all roads should stay open. We don't hurt the water shed and or anything else.

Letter 185

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

This past October I enjoyed a wonderful weekend of riding in the La Porte/Quincy/Graeagle area. The majority of the ride was within Plumas National Forest but also included the Downieville area. We were on OHV trails that have obviously been in use for decades. The forest appeared to be in fantastic shape. What would be the reason for closure of these routes? Can't these routes be inventoried and designated as OHV use? It's done elsewhere; I don't see why responsible recreation can't happen in Plumas NF. If closure proceeds, my riding friends and I will go elsewhere and take our money with us (motels, restaurants, stores, etc.). Please think about the residents of La Porte, Graeagle, Downieville, and Quincy before taking such radical action.

Response

Your comment has been noted. Please let us know which trails need to be added to our trail system.

Letter 186

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

Please understand off road riding was an important part of my development as a contributing person in society. It taught me respect for others as well as the environment. We must provide our children a recreational outlet to harness their energy in a positive manner. The more outlets that are denied the more prisons we will need in the future. Seems like a simple choice to me.

Please do the right thing and keep trails open for all to enjoy!

Response

Your comment has been noted.

Letter 187

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Off road motorcycling is a passion for me. It allows me to get deep into our public lands and see spectacular vistas not reachable otherwise. It is also fantastic exercise and technically challenging. During these tough times I would hope the opportunities for recreation would be enhanced. Please, it's our land let us enjoy it.

Letter 188

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As an avid outdoorsman in many respects, I believe that limiting access to any segment of the public for recreational use leads to general apathy in regard to the condition of our remaining natural areas. Exposing future generations to our national treasures in any fashion builds an appreciation and concern for the condition of our forests, deserts and other wild areas. Please do not limit access to California's outdoors to anyone for recreational purposes.

Letter 189

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Roads and Trails (incl. access general)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

I have purchased a home and spent thousands of dollars in Plumas County because I love to ride and experience the outdoors. I am able to ride from my garage on numerous roads and trails.

In the event my access to the roads and trails are diminished, I will sell my property at a loss and take my significant local expenditures elsewhere.

Please do not limit the public from using our public lands.

Response

Your comment has been noted.

Letter 190

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please leave these trails opened for all to enjoy!

Letter 191

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Disabled and elderly use

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Closing roads in "our" forest is all manner of wrong. The forest is for all people to use and enjoy. As I grow older, and not able to walk as much, or as well, as a young man, motorized travel is necessary for me to access "our" forest. I use the term "our" because it belongs to all the people, it is not he Kings Property. Closing these roads is discrimination against older and impaired persons. The existing wilderness areas are already set aside for non-vehicle access. When, and where, does it end? A road or trail that goes nowhere is what I seek. Do not close any roads, do not discriminate against me.

Letter 192

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I find the entire issue of closures within the Plumas Forest very upsetting. I have lived here for forty years and have traveled every road, trail and open way within the forest. Your intentions were very suspect in the beginning and the reasons for closure have changed several times until finally you figure you have found one that would stick. Ways of travel that were not created by USFS and have been intact for a hundred years fallen victim to your destructive approach.

Comment 2

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I was part of the initial group marking routes on maps in hopes of keeping certain routes open when in reality those very routes had already been closed by blade and ripper. USFS staff I talked to stated that they too were surprised as they found such closures by accident as they traveled through the forest. Evidently, communication is lacking within the forest service community.

Comment 3

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

A service group to the public you are not! Decency dictates you stop your arbitrary practices based on junk science and environmental biases. There is little if any damage being done to the forest s by vehicular travel. If you want to view damage, visit the waterways and view the natural erosion as they course through the steep canyons. Billions of yards of soil and rock crumble into the waterways as a natural act of nature. Vehicular travel cannot come within one percent of such action. As for damage to the forest in the future, consider fire, earthquake and volcanic events. Man cannot match the devastation held in store by nature. It seems prudent we stop pretending.

Letter 193

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please do not close this area to us. We all want to enjoy the outdoors and our choice is off road motorcycles.

Comment 2

Action: Influence of Interest Groups and Politics

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

There have been too many closings and it is very frustrating to have a small group dictate to a large users group where they can and can't ride and use public resources.

Letter 194

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I enjoy riding my Quad Runner on the back roads and trails where it's legal and do not want to see the roads and trails closed in the Plumas National Forest.

I would rather see my grand children and my sons out on their motorcycles in the forest than on the street corners looking for something [to] do.

Please be reasonable in your closures and consider the people that use the back country for recreation.

Letter 195

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As a former resident and current landowner in Plumas County I wish to add my voice to those calling for the least restrictive regulation necessary on OHV use in the Plumas National Forest. The land belongs to the citizens of this country, not to a few unelected bureaucrats merely wishing to make their responsibility to manage our most valuable national assets less onerous for themselves. I spent nearly two decades growing up in Plumas County and some of the best memories of my time there were of exploring, camping and hunting the wilderness areas and back roads in that beautiful County. I have been gone for nearly thirty-five years and still consider it my home. I do return regularly to enjoy the beauty and serenity of PNF, and fervently wish others be able to enjoy the freedom to roam that I enjoyed so much.

Response

Your comment has been noted.

Comment 2

Action: Classification

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

The local communities are in dire enough straits economically without further handicapping their ability to attract paying customers to their businesses through recreational opportunities in the area. Why make things worse for the locals when it is just so unnecessary?

Response

Your comment has been noted.

Letter 196

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Rather then bombard you with all the reasons you will no doubt already be getting relevant to this issue, I will just say, I urge all involved to please keep this and any other areas open to off-road recreation. It is imperative as a Free Nation that we respect the rights of all responsible users.

Letter 197

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	Request for 45 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I am requesting an extension of the DEIS comment period. I can not read, interpret, or understand a document written by a team of Agency employees over a period of years in mere 45 days.

40 CFR 1500.1 clearly states that:

Ultimately, of course, it is not better documents but better decisions that count. NEPA's purpose is not to generate paperwork—even excellent paperwork—but to foster excellent action and public scrutiny are essential to implementing NEPA and Section 102 (2) contains "action-forcing" provisions to make sure that federal agencies act according to the letter and spirit of the Act. 8 40 CFR 1500.5 says: Agencies shall reduce delay by:

Establishing appropriate time limits for the environmental impact statement process 8 40 CFR 1501.8 (b) (iv) Degree of public need for the proposed action, including the consequences of delay.

(v) Number of persons and agencies affected.
(vii) Degree to which the action is controversial. 8 No where in there is a hurry up and just get it done statement. That seems to be the defining rule here and is in conflict with the letter and spirit of the CEQ. Quite frankly, this decision is very controversial, will affect millions of forest visitors, provides the smallest possible window for public scrutiny and effectively castrates their ability to make informed significant comments. To resolve this complaint, I have but one request:

Extend the comment period to a total of 90 days to conform to both El Dorado and Tahoe forests comment periods.

Response

The comment period was extended 30 days.

Letter 198

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 1 (No Action Alternative)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I prefer alternative 1 "No Action". Please do not restrict our public use of our public lands.

Letter 199

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

After cursory review of all the alternatives, these are my findings:

Each alternative surely is designed to satisfy or meet the objectives, based upon the significant issues. They do present an array of potential actions. It did not take me long to realize which alternative best meets my concerns and the reason it should be selected.

Alternative 3

The addition of more access for motorized vehicles would be a mistake and here's why:

There's already enough access. In fact, go out into the Plumas National Forest on any given day, on an already established road, and you will find lots of space, wow! There's nobody there or very few, its wide open now, with plenty of roads to enjoy. Am I missing something? So why would we want to build/construct/open more motorized routes?

Comment 2

Action: Alternatives General (add, change, delete)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternatives 4 and 5 offer additional motorized routes that don't make any sense; most are existing or old temporary roads built and/or closed by the Forest Service at one time that dead end.

I know because they are very familiar to me, I know the current road system.

I helped plan it, construct it, and manage it, in my various roles, whilst working on the Beckwourth RD for over 25 years.

The management of the PNF road system has evolved and continues to respond to all our needs. And yet, what are our needs now and into the future (…hence, this DEIS to find that out.

The additional roads proposed in alternatives 4 and 5 are not needed now or in the future. Again, we don't use all the routes that we have now, so why propose more?

Letter 200

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The DEIS treats all routes as the same width. Speed of OHV and fall line slope effect soil disturbances. I request the FEIS compare the affect that route widths (single-track, 50" or less, etc.) have upon the cumulative watershed effect and road/route densities against the one-width fits all used in Section 3.5's analysis.

Response

The "Field survey methodology" section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Comment 2

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The DEIS recommends that certain routes be closed seasonally. Higher altitude trails that are normally winter closed with deep snow need different considerations than the lower elevations, French Creek area as an example. During the spring melt of snow that may be shallow enough to motor through, the soil is at its most vulnerable-saturated state unless on a hard pack surface. The rain season on the Plumas is consistent with the seasonal changes. However there have been times in past that significant rain has fallen during the 'dry mouths' that may affect the sustainability of OHV trails. Conversely, dry weather may occur within the closed dates. A seasonal based closure in effect would unreasonably limit the recreation opportunity during a dry time. I believe a rain gauge measured closure together with a drying time is a superior system to a date based closure concept. There are a number of National Forests that use a rain gauge – dry time effectively. Seasonal closures are administratively effective. Recreation is year long. I request that the FEIS address a rain gauge consideration along with some uniformity within the California Forest system.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist. Precipitation data does not adequately describe saturation and soil moisture conditions so a closure based on rain gauge data alone would not accurately predict when travel on the trails would not produce soil and water impacts.

Comment 3

Action: Alternatives General (add, change, delete)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

There is no alternative offered that includes forest closures and the many inventoried trails that culminated in the three year public process. The DEIS omits many hundreds of miles of trail in Alternative 2 through 5. How many of these excluded trails have been physically site specific analyzed?

Response

410 miles were surveyed with this effort. 35 miles were added to the routes surveyed after receiving scoping comments from the public after the Proposed Action was published.

Comment 4

Action: Other/Unspecified

Resource(s): Cultural Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Trail 6m26 has been closed to protect historical and ethnologic concerns. The West one-third of this trail, at 23n15 Eastward on 6M26 through 23n47x is a viable OHV trail. I request that the 6m26-23n47x-23n47xa be included.

Comment 5

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Trail 6M24 from the Snow Hut/Staging to 23N15 is convenient for OHV users staging at 4-Trees.

High density – frequency of use of any trail diminishes the 'sustainable factor'. In particular this trail that uses a cut bank at the East end 6m24/23n15 becomes a consideration when all traffic needs to ingress-egress the trail on this cut-bank. Motorcycles have a distinctive steering geometry difference in comparison to ATV – quad vehicles. Motorcycles are able to turn sharper at any given speed on single track. ATV's, in most part, have a locked differential that may be abusive to soil-tread wear in sharp motorcycle turns. During a turn the inside wheel must rotate more revolutions per foot forward than the outside wheel. When on the gas (full throttle) this wheel spin difference is noticeable. Some of this existing single track trail will need turn modification to allow the longer turning radius of the ATV.

a. Ingress/egress at the junction 23N15 – 6m24 will need significant alteration to allow transition from single track to 50 inch at the cut bank. Also a needed longer radius approach angle to allow the longer turning ATV room to negotiate a right or left turn.

Safety: Single track motorcycle trail is inherently a slower forward speed trail. Multi-direction traffic (head-on) will increase the closing speed of approaching traffic on 50" trail.

Letter 201

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 1 (No Action Alternative)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am in favor of the "no change" map and I am against the "East Coast" mentality of "closed unless marked open." We have lost many soldiers over the years fighting for "freedom." The historical idea of "freedom" includes freedom

of movement as well as the religious and civic freedoms common to our society. The closing of the national forests to citizens is wrong and a step closer to the society or forefathers fought so hard against during the revolutionary war and the war of 1812. Citizens have the right access without "permit" in our society and this right should be preserved and passed on to our children.

Letter 202

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	Request for 45 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I'm writing to request an extension for the Plumas DEIS comment period. A team of agency analysts and writers took years to create the DEIS, and I need more than just 45 days to individually review this massive document.

40 CFR 1500.1 states that: public scrutiny (is) essential to implementing NEPA and Section 102 (2) contains provisions to make sure that federal agencies act according to the letter and spirit of the Act. 8 CFR 1500.5 says agencies should reduce delay by establishing appropriate time limits for the EIS process, but does not instruct the agency to create and follow artificial, arbitrary date limits, whether set by Washington, Region 5, or a Forest Supervisor.

The FEIS/ROD that results from this DEIS will be controversial and complicated. I request that the Forest extend the comment period by 45 days to a total of 90 days to allow the kind of thorough, individual review, which will help individuals and organizations better-respond to the lengthy and complex DEIS which the Plumas National Forest Inter-Disciplinary Team has prepared and released.

Response

The comment period was extended 30 days.

Letter 203

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email

Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternative 2 and 5 sound good but which ever would allow for new trails to be added especially trails 50" or less for quads and dirt bikes because this is a growing sport. More hunters are using ATV's especially older guys; I would like to see exceptions on cross-country travel for retrieving game.

Letter 204

Attributes

Attribute	Value
Early Attention	None
Response Type	Petition
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We, the undersigned local residents and National Forest users, wish to express our opposition to any proposed Forest Travel Management Plan that forbids the use of any existing roads on National Forest land and request the modification of Forest Order No. 18-08 to accommodate the usage of these roads. While not advocating mindless cross-country travel and the destruction of the natural beauty by misuses, we feel that we need to be able to use the spurs, secondary roads, and "jeep trails" for firewood cutting, accessing our mining claims, getting to our remote fishing spots (that our parents showed us as kids!), etc. We are only asking to use the old, traditional routes that have been these forever!

Letter 205

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter

Delivery Type	Email
Comment Extension	No extension requested
Request Information	Other request for specific information

Letter 206

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	Request for 90 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Sierra Access Coalition would respectfully like to request a 90-day time extension to analyze and respond to the Plumas Draft Environmental Impact Statement (DEIS) for Motorized Travel Management.

Response

The comment period was extended 30 days.

Comment 2

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

The letter dated December 18, 2008 File Code 1950-3 that accompanied the release of the DEIS states that Alternative 2 is the "Proposed Alternative." However, page I states that Alternative 5 is the preferred alternative. This is very misleading and confusing.

Comment 3

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternative 1 is missing all inventoried unclassified route numbers making it difficult if not impossible to comment on individual routes.

Comment 4

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

The spreadsheets that show what decisions were made on each individual inventoried route are not in the DEIS.

Response

These spreadsheets (route cards) are part of the project record and are available on request.

Comment 5

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 26 2.3.44 #2 says "Error! Reference source not found." Is there missing data?

Response

This formatting error referencing the table on page 26 was corrected in the FEIS.

Comment 6

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 45 says Alternative 2 "provides the greatest amount of access to dispersed use areas", but on page 46 it says Alternative 5 "provides the greatest amount of access to dispersed use areas". Which alternative has the most? Where are the areas located?

Response

The analysis was corrected to state that Alternative 5 has the second highest amount of access to dispersed use areas of the alternatives that add trails to the NFTS.

Comment 7

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 55 1B1 says that routes currently open to the public were determined to have "minimal safety concerns". (This refers to all inventoried routes which are currently open to the public under the Forest Order). 1B2 on the same page says the routes would "continue to have potential safety and exposure concerns". Which statement is true?

Response

1B1 refers to motorized mixed use on high clearance existing system roads. 1B2 refers to the 1107 miles of unauthorized routes in Alternative 1. There are unauthorized routes having potential safety and exposure concerns that would not be mitigated as no routes would be added to the motorized trail system in Alternative 1.

Comment 8

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 55 1B2 says there are 11.3 miles of mixed use. Which roads are they? There doesn't appear to be list of roads in the DEIS.

Response

See Table 2.

Comment 9

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: See Section 3.XXXX

Page 77 Indicator #2 Methodology states that there are "errors in the stream and meadow layers" of GIS and those other determinations were "based on an office exercise" so these are "not always accurate". But there is no documentation of how the assessments and analysis compensated for these admitted errors.

Response

Limitations to the stream and meadow GIS layers are described in section 3.5.4 under the analysis methodology for mileage of proposed trails in hydrologically sensitive areas. Despite these limitations, analysis of the GIS layers provides a good coarse evaluation of proposed trail location in relation to stream and wetland locations. That coarse evaluation was refined by field survey data. The full length of each proposed trail was field surveyed. Each stream crossing was located and evaluated and the stream class (perennial, intermittent or ephemeral) at each crossing was noted in the field. The proximity of each trail segment to the nearest waterbody was also noted (see the Field Data Collection Form in Appendix C of the Soil and Water Resource Report).

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.XXXX, Appendices F, G, and H of the Soil and Water Resource Report

Page 88 states "126 route/stream crossings" were observed and "85 miles were rated "extreme" and unmitigatable. However the DEIS doesn't appear to contain documentation to support this. Is there an Engineering report that made this determination?

Response

Soil and water resource effect rating categories for proposed trails are described in Section 3.5.3.1. Route-specific summaries of field survey information (including stream crossings with diversion potential), soil and water effect determinations, and prescribed mitigations are presented in Appendices F, G, and H of the Soil and Water Resource Report.

Comment 11

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Pages 90-91 states Alternative 2 would result in prohibition of traffic on 738 miles. This mileage appears to be incorrect.

Response

Correction made.

Comment 12

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 92 states Alternative 3 would allow 3922 miles of routes. This mileage appears to be incorrect.

Response

Correction made.

Comment 13

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 94 – Which roads are affected?

Response

See Appendix E: Watershed Maps. Existing system roads and trails and proposed trails within these watersheds determined the density of roads and trails.

Comment 14

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 96 states Alternative 4 allows 4058 miles of routes. This mileage appears to be incorrect.

Response

Correction made.

Comment 15

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 100 states Alternative 5 would allow 4172 miles to be open. This mileage appears to be incorrect.

Response

Correction made.

Comment 16

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Page 114 3. Cumulative effects refers to the "No Action" alternative, and the "Cross-country ban only". What is the "Cross-country ban only"?

Response

This refers to the context of how cumulative effects are discussed. The point being that the "No-action" alternative actually allows for unrestricted cross-country travel across the Forest, as well as access to all of the current unauthorized routes.

Comment 17

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 115 3.6.4 refers to Table 1 as being a list of TES. But Table 1 on page 16 is a list of roads, not a list of TES.

Response

The Table reference has been corrected.

Comment 18

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Other (SEE RESPONSE)

Page 120 references "Mark, T personal communication". What does that mean?

Response

This is a personal communication rather than a publication.

Comment 19

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 133 – Which Bucks Creek is being referenced (Bucks Lake or Feather River?) Which Rock Creek (Meadow Valley or Feather River Canyon?)

Response

Bucks Creek is not referenced, however Rock Creek is, it is a tributary to Spanish Creek on the Mt. Hough Ranger District.

Comment 20

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 172 says "Error! Reference source not found" is there missing data?

Response

Correction made.

Comment 21

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 180 references Table 8, which is on page 43 and is a reference to recreation, not wildlife.

Response

Correction made.

Comment 22

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 182 references Table 10 which is on page 44 and is a reference to recreation not wildlife.

Response

Correction made.

Comment 23

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 182 references Table 11, which is on page 49 and is a reference to recreation not wildlife.

Response

Correction made.

Comment 24

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 187 references Table 14, which is on page 54 and is a reference to serpentine ecosystems not wildlife.

Response

Correction made.

Comment 25

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 200 references Table 24, which is on page 116 and is a reference to aquatic species, not terrestrial wildlife.

Response

Correction made.

Comment 26

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 200 references Table 25, which is on page 200 and is a reference to aquatic species, not terrestrial wildlife.

Response

Correction made.

Comment 27

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Cultural Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

There is no explanation for the Cultural Resource codes.

Response

HIS - Historic, PRE - Prehistoric, MUL - Historic and Prehistoric

Comment 28

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendices F, G and H of the Soil and Water Resource Report, Project maps attached to the FEIS

Water Resource – there is no explanation on the location of roads the water resource decision affects. Small maps in the back of the book don't help (page 422,423).

Response

Route-specific summaries of field survey information and soil and water effects are presented in Appendices F, G and H of the Soil and Water Resource Report. Detailed maps of trails proposed for each alternative are available on-line or (upon request) on compact disc.

Comment 29

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

This is just a partial list of errors, discrepancies, omissions, and contradictions in the DEIS. These errors make it time consuming to read the document. It takes considerable time to understand what the document is trying to say, and to figure out which statements are true. There are also numerous references to other documents that SAC will probably need to request at a later date to enable us to understand the DEIS.

We have spent several weeks reading the DEIS, and as you can see by our references we are only up to page 200. In order to work our way through the document, an additional 90-days will be required to a produce a comprehensive comment to the DEIS.

Response

We have attempted to address the factual corrections suggested by the commenter and granted a 75-day extension.

Letter 207

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No specific time mentioned or other
Request Information	None

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

In the 1988 Plumas National Forest Land and Resource Management Plan Environmental Impact Statement it states

that the "Off-Road Vehicle Travel Plan 1/12/77" is what will be used, but it does not elaborate on what that is. So where is the plan? It is only referenced.

Response

The 1977 Plumas National Forest Off-Road Vehicle Control Plan documents the addition of 8 areas closed to all vehicles around Davis, Antelope, Round Valley, Butt, Fowler and Frenchman Lakes and Challenge Experimental Forest and Tamarack Flat totaling 29,500 acres.

Comment 2

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

It's too bad that the Plumas Goss Hawk/OHV study is not referenced but elephants crossing roads and avoiding villages is. I'm sorry I don't get it.

Response

In 2003, the Forest Service initiated a study on the effects of OHVs on nesting goshawks in the Plumas NF with Jeff Dunk as the principal investigator. The analysis of that data continues and formal results of that study are currently being prepared but are not expected to be completed prior to the completion of the FEIS and ROD. Preliminary impressions from that study were presented by the study investigators at the Ecological Society of America and Society for Ecological Restoration Joint Conference in 2007 (Dunk et al. 2007). At that time, the preliminary indications were that monitored goshawks did not appear to be negatively affected as the commenter notes. However, details and analysis that would be necessary to fully consider the implications of this study in the FEIS will not be available until the final report is completed, thus this information was not cited in the FEIS. If the final results of this study present significant new scientific information relevant to the Plumas travel management program, it will be considered at that time and adjustments to the travel management program could be considered.

Comment 3

Action: Use of Public Comment (vote, majority opinion, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Sierra Access Coalition has substantive comments ready to be sent but without the materials requested they may be incomplete and this may be our last chance. Without the 1977 "Off-Road Vehicle Travel Plan" significant problems in data may occur.

From the beginning I have stressed that the Plumas NF has the potential to be the premier OHV plan but I'm worried it's headed to the R5/Plumas non-user plan. No user groups have worked harder than those working on the Plumas and to not supply the tools and time needed makes this not NEPA worthy.

Six years on your end and 75 days for unpaid volunteers to respond with a large piece of data missing is not the way to achieve an agreeable OHV plan.

Response

The 1977 Plumas National Forest Off-Road Vehicle Control Plan was provided to SAC on March 17, 2009. It documents the addition of 8 areas closed to all vehicles around Davis, Antelope, Round Valley, Butt, Fowler and Frenchman Lakes and Challenge Experimental Forest and Tamarack Flat totaling 29,500 acres.

Letter 208

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other (Non-NEPA) Processes (e.g., leasing, permitting, acquisition, ROW)

Resource(s): Transportation

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

There are at least three routes involved in this plan that fall under RS2477. These routes were inventoried and numbered 11M09, 8M07, 8M05 in your database: Spring Garden Tunnel, Little California, and Deadman Springs (Perry Jones), respectively.

These routes are currently not included in all alternatives. We would like to provide you with some history on these routes.

The Spring Garden Tunnel road was built to provide access for Western Pacific Railroad to construct the Spring Garden Tunnel. This tunnel is one of the "7 Wonders of the Railroad World". (http://www.plumascounty.org. /PDF/7Wonders.pdf) Construction of the tunnel was completed in 1909. This was before the Plumas National Forest was established, therefore the access road 11M09 is protected by RS (Revised Statute) 2477.

The Little California and Deadman Springs (Perry Jones) routes were built in the late 1800's for access to mining claims on the Middle Fork. Both are still enjoyed today by many Plumas County residents.

Local residents have a deep understanding of our history and heritage, and wish to preserve this knowledge and respect for future generations.

RS 2477 rights-of-way are property rights originally granted by the federal government to establish the transportation network essential to settlement of the western frontier. These rights-of-way grants were made to local governments and are held in trust by them for the public. Today, they continue to provide virtually all the public access to and across the hundreds of millions of acres of public and private lands in the West and Alaska.

The Forest Service cannot close public access on a road that falls under the authority of RS 2477. SAC would like to request that the Forest Service add these three routes to ALL alternatives that are being proposed under the Draft Environmental Impact Statement.

In addition to these specific routes, the Forest Service must provide data in the Final Environmental Impact Statement to show ALL roads on the Plumas NF that fall under the jurisdiction of RS 2477. To comply with NEPA, a complete and comprehensive analysis must be completed to show how RS2477 roads will not be impacted by the Travel Management Plan.

Response

11M09 has been added to Alternative 5 and 8M05 and 8M07 are existing system motorized trails included in all alternatives.

Letter 209

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The roads listed at the end of this letter are all shown as Maintenance Level 3 on the Maps included in the Plumas DEIS. I am requesting that these roads be classified as Mixed Use Roads. Each of them is a Maintenance Level 3 Road that creates a barrier to accessing Maintenance Level 2 Roads where ATV-OHV vehicles can be used.

It is my understanding that the purpose of the Plumas National Forest Public Motorized Travel Management Plan was to enhance the use of ATV-OHV utilizing loop road opportunities as well as trails designation and improvement. I understand that it is permissible to cross a Maintenance Level 3 road on an OHV - ATV in a direct path to reach and ride on another Maintenance Level 2 road. Most of the roads listed below this letter create isolated Maintenance Level 2 roads which are separated by as little distance as less than a mile. This requires loading and unloading vehicles after a enjoying a two or three mile ride to use another Maintenance Level 2 road.

Towing to multiple Maintenance Level 2 roads where OHV-ATV use is permitted can and often does create problems finding enough space for parking your vehicle and trailer and loading and off-loading. This will be and now occurs at popular locations where several parties are riding in the area.

My request is to provide OHV – ATV USE on the roads listed below to provide the public with the ability to complete a complete day's ride or to reach one or two locations without having ride illegally on a Maintenance Level 3 road or without having to load and unload multiple times during a day.

An example where the designation of Mixed Use would be beneficial is on the 23N08 road at the Sloat Bridge. It is now a Maintenance Level 3 road. If you want to ride up Nelson Creek, you can off load at Sloat at the junction of 23N08 and 23N10 and ride the 23N10 road which is now classified as a Maintenance Level 2 road. But if you want to ride the Eureka Ridge Road which is 23N09, you must haul or trailer for approximately 3 miles on 23N08 (a Maintenance Level 3 Road) to reach the 23N09, the Eureka Ridge Road. The fact that 23N08 is a Maintenance Level 3 Road eliminates loop rides from the Sloat area into Plumas Pines, to Johnsville, to Poplar Creek, Eureka Peak, the A Tree, Mc Crea Meadows and to the south end of Eureka Road. If 23N08 was a Mixed Use then these loops would be available

Changing the classification of many of the roads on the attached list would open up many loops and destinations for the ATV-OHV Rider to make a complete days ride. The example that I explained above is just one of many throughout the Forest that are available to make a complete day of riding and an enjoyable day of recreation and sight seeing.
I have rode or driven all of these roads and have found no problems when meeting other licensed or GreenSticker vehicles. The fact that the folks driving on Forest Roads are generally cautious and drive safely is evident by a low accident rate on Forest Roads for all classes of vehicles. The surface, corners, and grades on these roads are suitable for the use of both types of vehicles.

Maintenance Level 3 Roads - Change To Mixed Use Roads To Permit Ohv – Atv Use Along With Licensed Vehicle Use.

1) 27n09 - Hungry Creek Road - (Antelope Road 172) To 28n03.
2) 27n10 - Beardsley Grade Road - (27n10 To 28n03)
3) 28n03 - Fruit Growers Bvld - (27n09 To 29n43)
4) 28n31 - 28n75 To 28n34
5) 28n02 - Diamond Mountain Motorway
6) 25n42 - Flourney Road - Plumas County Road 111 To Little Grizzly Creek Road (Plumas County Road 112
7) 25n42 - Squirrel Creek Road - Plumas County Road 112 On Little Grizzly Creek Road To County Road 401
8) 29n46 - Moonlight Road (Pc 213) To Fs 28n08
9) 28n08 - Cairn Butte - Indicator Peak Road
10) 26n22 - Rush Hill Motorway (Pc 306) To 27n17
11) 27n98 - Sh89 To Ohio Valley And To Butt Lake
12) 27n26 - Sh 70 Up The Caribou Road To Campgrounds
13) 26n22 - Sh 70 - Rush Creek Road To Red Hill Road
14) 24n28 - Fourth Water Road From Big Creek Road (Forest Highway 23).

15) 23n16 - Schneider Creek Road (Plumas County Road 119 To Fourth Water Road 24n28)
16) 24n28 - Rock Creek To Plumas County Road 119 To Fourth Water Road (24n28)
17) 23n16 - Schneider Creek Road
18) 24n08 - Sloat To Junction 23n08c (Plumas Pines)
19) 22n25 - Jackson Creek – State Highway 70 To Happy Valley
20) 23n11 - Happpy Valley To 24n12
21) 24n12 - 23n11 – Sh70 To 24n10
22) 24n08 - Plumas County Road 175 – Plumas Ounty Road 111
23) 26n70 - 29n03 – 26n70
24) 26n70 - 26n16 - Pc176
25) 26n70 - 26n01 – 28n01
26) 25n18 - Squirrel Creek Road County Road

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segments listed by the commenter were not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester was given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Letter 210

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

In Appendix A: List of Routes and Resource Impacts of the Plumas National Forest Public Motorized Travel

Management Draft Environmental Impact Statement there is an error in the information. On page 381, Trail Numbers 11M10 and 11M11 are listed as Non-Existent. This is incorrect data. Both of these trails do exist.

Trail number 11M10 joins road 11M12 in the location shown on Map MtHough-07-12-26a.pdf in section 23. This junction is flagged in RED and has the Trail Number written on the flagging. The junction of the trail is at a very brushy location on road 11M12 in a flat area. To reach the trail 11M10 you must walk through the brush for about 50 to 75 feet when you can see the beginning of the trail which runs to your right and climbs up on the ridge. As you follow the trail to the top of the ridge you find several fallen trees that are too large to be moved by hand. Beyond that point, you will find a fallen Tram Building that was a portion of the Walker Mine-Spring Garden Tramway. Beyond that point the trail is a tractor line along the ridge that was put in to fight the Greenhorn Fire (year unknown). On this date the trail was not followed along the ridge to the point where it ties into 11M11. It was late in the afternoon.

I have spoken to a resident of Greenhorn that rides this trail, and also 11M11. He has not flagged the trail where it leaves FS Road 24N02X in a very brushy area at the top of the ridge. He indicated to me that he rides these trails on his Quad several times annually.

Just beyond where trail 11M10 leaves road 11M12, there is a metal larker indicating the point where the Jim Beckwourth Trail drops off of the ridge toward the junction of State Highway 70 and County Road 401. A picture of this sign came be seen in the Sierra Cascade Acquisition Web Page. Also in that area along 11M10 on the cut bank side of the road 11M12 are sections of the cable from the Walker Mine Tramway. The sections pf the cable stick up out of the ground for a couple feet.

These trails (11M10 and 11M11) will take some maintenance to make passable for quads and single-tracks but the work would be worthwhile as it would create another Loop for OHV – ATV use.

There is another trail that drops off 11M10 down toward FS Road 24N50C toward Emigrant Creek that would create another loop route.

Unfortunately, I did not have time or was not able to find help to more thoroughly review these routes within the timeframes provided in the on-the-ground investigation portion of the planning segment of the study. I am requesting that these routes be included in the Plumas National Forest Public Motorized Travel Management Plan. Once again they would provide more loops on the Grizzly Ridge area of the District. They would provide many scenic views of the remote areas, mountains and valleys in Plumas County.

Response

11M10 and 11M11 were added to Alternatives 4 and 5.

Letter 211

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track

Motorcycles.

SLOAT AREA:

LOOP NUMBER 1. FS23N08 – If FS23N08 was reclassified as a Mixed Use Road or a Maintenance Level 2 Road, you would begin your ride at the junction of FS23N08 and FS23N10. This is just west of the bridge that crosses the Middle Fork of the Feather River at Sloat. You would proceed to the left on FS23N08, the Popular Road into Section 11 where it meets a lower class road (NumberU8398). From this junction, road U8398 continues into the Johnsville area. To continue the loop from the junction of FS23N08 and U8398, you continue on 23N08 to FS23N10, the Eureka Ridge Road. It is a Maintenance Level 2 road which permits ATV use. From this junction you can ride the Eureka Ridge Road back to Sloat through the Popular Creek Valley if FS28N08 was a Mixed-Use Road. You can also ride into the Eureka Peak Area, the A-Tree area, and the McCrea Meadows area and. You can also ride Sierra County Road 900 to Gibsonville at the Quincy - La Porte Road. Along the lower portion of FS23N08, you can ride alternate roads and trails to reach the following areas: Camp Layman area over Big Hill, and the Plumas Pine Resort area. As a note: Road U8398 should be included in the Plumas NF Motorize Travel Plan. It receives a great deal of use from the Johnsville-Graeagle area.

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Comment 2

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.

Sloat Area:

LOOP NUMBER 2. FS23N10 – Beginning at the junction of FS23N08 and FS23N10, you ride on straight ahead on FS23N10. This road provides a great ride above the Middle Fork of the Feather River and the Nelson Creek Drainage. Beyond the bridge that crosses Nelson Creek near Zumwalt Flat, FS23N10 climbs up the mountain through scenic areas, old mining sites, roads and trails and then to the Bunker Hill Ridge area. From there you can ride to Sierra County Road No. 900 to Gibsonville at the Quincy-La Porte Road.

About 7 miles from the junction of FS23N08 and FS23N10, you make a left turn and ride FS23N39 to the top of Eureka Ridge and Road FS23N09. If FS23N08 was a Mixed Use road you could ride south on Eureka Ridge to the Popular Creek road, FS23N08, and back to the FS23N08 and FS23N10 where the ride began. As it is now shown on

the DEIS Map, you would need to begin and end this ride at the junction of FS23N08 and FS23N09 and unload and load your ATV.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Comment 3

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.

Jackson Creek Area:

LOOP NUMBER 3. – FS23N11 (1) – The road that I am requesting be reclassified from a Maintenance Level 3 road to a Mixed Use Road is FS23N11. The change would allow ATV riders to reach many locations from the Jackson Creek Campground just east of Cromberg along SH70. FS23N11 climbs up the mountain about 7 miles to Happy Valley and to many other locations. Along FS23N11, you can turn off on FS23N28 and ride through the Layman Burn and climb to Penman Saddle on FS23N06. From this point, you can turn back down the mountain on this same road and cross Bonita Ridge and ride down to the SH70 Highway. There are several Forest Service roads that cross Mt. Jackson from Bonita Ridge that reach FS23N11 near the Jackson Creek Campground. In addition to making a loop ride to Happy Valley, you can make numerous other loop routes from FS23N11 in the Happy Valley area. As the map is now printed, many of these areas are very difficult to reach because there are Maintenance Level 3 Roads that do not permit reaching the Maintenance Level 2 roads that reach the destinations. These rides will require many loads and off-loads along FS23N11 with it classified as Maintenance Level 3 road rather than a Mixed Use Road.

Although SPI owns quite a bit of land in the area and has been logged the area regularly, a weekend ride avoids almost all of the traffic associated with their operations.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV

use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Comment 4

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.

Jackson Creek Area:

LOOP NUMBER 4. – FS23N11 (2) – Changing the classification on this road to Mixed-Use provides access by ATV's and Single tracks to the Happy Valley area. From the Happy Valley, other locations can be reached such as the Grizzly Ridge and Brady's Camp areas. FS23N11 in Happy Valley connects to other Maintenance Level 2 roads in the area that reach many other locations such as the Grizzly Ridge and Brady's Camp areas, Mt. Ingalls, Smith Peak, Turner Ridge, and Badger Pass. With FS23N11 classified as a Maintenance Level 3 road, it is a now a seven mile uphill tow with an ATV to reach Happy Valley. Most of the routes that leave the Happy Valley area are shown as ATV routes in the OHV Guide that the Plumas distributed several years ago.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Comment 5

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.

Dean's Valley – Fourth Water Ridge Area:

LOOP NUMBER 5 – FS24N28 and FS23N16 – The reclassification of portions of these two roads to Mixed Use would allow for the use of many loops in the Deans Valley and Fourth Water Ridge areas. FS24N28 is now shown to be considered for classification as a Mixed Use road from the junction of FS24N20 near the Rock Creek Campground south to near the Bottle Springs area. From this location, FS24N28 remains a Maintenance Level 2 road until it crosses Fourth Water Ridge and begins north toward Forest Highway 423 which is known as the Big Creek Road.

If the Mixed Use classification was continued all the way to the Meadow Valley County Road 411, a large parking space to load and unload is available. This would require a direct crossing of the paved County Road, which is permissible.

The west portion of FS24N28 is now classified as a Maintenance Level 3 road from the Big Creek Road, Forest Highway 423, to the junction on Forest Service Road FS24N28F. This classification eliminates ATV use all along the west side of Fourth Water Ridge. I am requesting that it be reclassified to a Maintenance Level 2 Road or a Mixed Use Road.

FS23N16, which is the Schneider Creek Road, is located in the middle and on top of Fourth Water Ridge. It is located between FS24N28 which circles Fourth Water Ridge. It begins in Meadow Valley at Plumas County Road 119. FS23N16 is classified as a Maintenance Level 3 road which prohibits the use of ATVs crossing over the ridge to reach FS24N28 on the other side of Fourth Water Ridge. There are several Forest Service roads that leave FS24N28 from both sides of the ridge that end at FS23N16. But it is not possible to ride across the ridge on any of these roads as they do not met FS23N16 where you can directly cross the road. If the Schneider Creek Road was classified as Mixed- Use Road from the junction of FS2447X in Section 3 into Section 13 where it splits on the west with several spurs roads, crossing the ridge would be possible on a Quad or a Single Track. There is a lot of use in the Fourth Water area during hunting season from the Meadow Valley, Quincy, and Bucks Lake areas. The restrictions placed on these two roads by classifying them as Maintenance Level 3 roads, will not allow ATV use in this area as it has in the past.

There is a great deal of use of the area from both the Dean's Valley Campground and Rock Creek Campgrounds. Access to the west from these campgrounds will be severely limited with these two major roads Classified as Maintenance Level 3. Also day use from the Quincy area over the Watershed Road and that from the Claremont area will be restricted by the Classification of FS24N28 as a Maintenance Level 3 road instead of a Mixed Use road. FS23N16 and FS24N28 provide access to the Middle Fork of the Feather River and to the Claremont areas. Both of these roads are safe enough to facilitate the use by both OHV and Licensed vehicles.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Comment 6

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.
Dean's Valley – Fourth Water Ridge Area:

FS 23N16 – This road needs to be changed to a Mixed Use Road. It is the Schneider Creek Road. It runs up on top of Fourth Water Ridge and separates both sides of FS24N28. It is a Maintenance Level 3 road which prohibits the use of ATV's. There are many Maintenance Level 2 roads that leave FS24N28 on both sides of the ridge and meet at FS23N16. As it is displayed now on the DEIS Maps, these roads can not be used by a Quad or a Single Track vehicle because these spurs roads do not meet directly across from each other at FS23N16. Use of these spurs will require riding along the FS23N16 to reach the next Maintenance Level 2 road.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Comment 7

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.

Lake Davis – Happy Valley Areas:

LOOP NUMBER 6. This loop begins on FS24N12 at the junction of FS24N07 in Sections 30 and continues to the south end in Section 17.

For travel from the Lake Davis area to Smith Peak you can travel on a Maintenance Level 2 road FS24N17 and FS24N17A. To travel any further to the North onto other Maintenance Level 2 roads it is necessary to travel on Maintenance Level 3 Road FS24N12 through the Three Mile Valley area. I am requesting that FS24N12 be reclassified for Mixed Use. It would open up many loops through the Three Mile Valley area and the southern portion of Grizzly Ridge for Quads and Single-Track use.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Comment 8

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

I am submitting to the team the following proposal for Reclassification of Maintenance Level 3 Roads to Mixed Use Roads. The Reclassification will provide Loop Rides which I feel need to be included in the Final Plumas National Forest Public Motorized Travel Plan. The Loop will provide the Public with riding pleasure and the ability to see many features and scenic views of the Forest without repeated reloading of their ATV's and Single Track Motorcycles.

Lake Davis – Happy Valley Areas:

LOOP NUMBER 7, FS24N12 at the edge of the Happy Valley area to FS23N46 would provide a loop from Happy Valley to the Lake Davis area and would also provide access to many Maintenance Level 2 roads along the southern end of Grizzly Ridge and to the Smith Peak area. I am requesting that these Maintenance Level 3 roads be classified as Mixed Use Roads. This would provide a loop to Smith Peak and to the Lake Davis and Three Mile Valley areas from the Happy Valley area for Quads and Single Tracks. Establishment of this loop will provide a great deal of ATV riding opportunities for those in the Portola and Graeagle Areas as well as visitors to Lake Davis.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. In determining vehicle permissibility, this consideration of public safety is of higher importance than the convenience of any specific recreational activity. As a result, OHV use is not allowed on roads maintained for passenger vehicle travel, known as Maintenance Level 3,4 and 5 roads through agency classification. By eliminating cross country vehicular travel and regulating Level 3, 4 and 5 travel to licensed vehicles it is acknowledged that some past OHV use practices will change on the Plumas.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The specific Level 3 road segment listed by the commenter was not analyzed for mixed use by this effort. Analysis of Level 3 road segments for mixed use, in general, was discretionary by the Forest and not a requirement of the Travel Management Rule. All Level 3, 4 and 5 roads create links to greater Forest road networks. This fact, in itself, is not a compelling reason to designate Level 3 and above roads for mixed use. Public safety as expressed by policy from the Regional Forester is given greater consideration. Further designations of mixed use on Level 3 roads or new routes to greater network links may be considered in the future.

Letter 212

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Mount Hough District

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

I am requesting that the following proposed trails and roads be included in the Plumas National Forest Public Motorized Travel Management Plan. Most of these routes are noted in Alternative 5 and the remainder are in Alternative 2. These trails are on Grizzly Ridge Area in the vicinity of Brady's Camp along FS25N29 and south of that area where FS25N42 crosses Grizzly Ridge.

The routes that I am requesting are included in the Plan that are along FS25N29 and access the area above the road to the top of Grizzly Ridge. These routes utilize existing routes, spur roads and skid trails.

1) 11M17 – Campsite near top of ridge. This location is accessed by old existing road.

2) 11M18 and 11M18a – View points where both of these roads reach the ridge top. View of Genesee Valley, Mt Ingalls, and other scenic portions of the east side of Grizzly Ridge. These roads are old roads which portions of were used as spur roads. They have gentle slopes and can be used by pickup trucks as well as ATV's

3) FS24N19, FS24N19A, 11M13, 11M13A, and 11M13B – These routes reach the top of Grizzly Ridge. They provide a ridge-top view of scenic areas east of the ridge such as Mt. Ingalls, Peel Ridge a Geologic Feature (a Devil's Post-Pile), and to the west you can see Pilot's Peak, Argentine Rock, Eureka Peak and many other features. The ridge top is essentially an open area with Wyethia (Skunk Cabbage) and thickets of pine and fir trees. The routes that are used to reach this are designated in Red Flagging with the route numbers marked on them. You reach the ridge top following a spur road and skid trails. The access across the top of the ridge is open terrain that has not roads or trails. From the area of the Devil's Post Pile, there are two routes that drop down to spur road FS24N19A and FS24N19. These routes follow existing skid trails.

Although this area is also proposed as a Citizen's Inventory Roadless Area by the Wilderness Society routes through the area provide a Multiple Use aspect by providing access into and through this area. Maintaining access to the trail area will minimize any environment impacts to the area, while providing a recreational opportunity to the segment of the population that uses ATV's. Shared use of this area is the optimum use of this portion of the Plumas National Forest.

Response

11M17, 11M18, 11M18A are included in Alternative 2 and 5. 11M13, 11M13A and 11M13B were modified in Alternative 5 to provide for better access to these areas.

Comment 2

Action: Beckwourth District

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

The routes in this area that should be included in the Forest Plan and maintained as roads and trails is located south of the Brady's Camp area where FS25N42 crosses Grizzly Ridge into the Beckwourth

There are 3 routes that join FS24N19 (11M12) south of the point where FS25N29 crosses Grizzly Ridge into the Beckwourth RD. 11M12 is an old road that runs along Grizzly Ridge to the south for approximately 1 ½ miles. In section 23, in a flat area of the road, trail 11M10 and 11M11 join this road. The junction of 11M10 is flagged with red flagging at the junction of 11M12. This junction is a very brushy area but 11M10 goes around the brushy area and climbs the ridge where is hits a tractor line which was put in to fight a fire near Greenhorn. There are some trees across this trail but with maintenance it is a useable ATV trail. It passes the remains of a cabin that served the Tram lines from the Walker Mine to Spring Garden. As you follow this trail along the ridge you will find an ATV trail that drops off to the east toward Emigrant Creek and FS24N50C. Continuing on 11m10 you come to the junction of 11M11 which runs to the west to FS24N02x at another brushy point. Both 11M10 and 11M11 are noted on the Appendix in the DEIS as not existent trails. This is an error. They exist and were not located by the Forest Service personnel that were assigned to verify them. Those three trails need to be added into the Planning effort and approved for use. Maintenance of removing brush and fallen trees will provide additional ATV routes. These trails are currently being used by horse groups and by local residents with Single Track bikes and Quads. The junction where 11M11 meets FS24N02X is not flagged. I did not have the time or the ability to reach that junction to and label flag it. I am relaying information, in part, by the resident that uses that junction from the Greenhorn area.

Response

11M10 and 11M11 were added to Alternatives 4 and 5.

Letter 213

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

I have read the document titled "Region Five Direction - Mixed Use Roads" that describes the recent changes in direction for completing the National Forest Public Motorized Travel Management Plan that Region Five sent to each National Forest during the week of January 12th. The document provides an update to the direction and procedures on how to complete the transition of a Maintenance Level 3 Road (ML 3) to a mixed use road. This document located on Page 2.

This document changed the FSM direction on procedures that are to be used to reclassify various lengths of Maintenance Level 3 Roads to mixed use roads. It adds additional tasks and approvals to the process of gaining reclassification to these roads and for Forests to gain approval of their Revised Plumas National Forest Public Motorized Travel Management Plan.

This document was sent to me by the Plumas Forest Engineer. I have been making verbal requests and sending email messages to him, asking that specific Maintenance Level 3 Roads be reclassified to mixed use roads so I could use my 4-wheeler on them and ride loops on several roads.

Maintenance Level 3 Roads prohibit the use of 4-wheelers and Single Track Motorcycles. Mixed use roads allow the use of these roads by 4-wheelers, single track motorcycles as well as street licensed vehicles.

One repeated reason for not reclassifying Maintenance Level 3 Roads to Mixed Use status is the risk of vehicle accidents between Street Licensed Vehicles and ATV and Single Track Motorcycles. I feel that this safety issue is not critical on the Plumas National Forest. There have been very few traffic accidents between these two classes of

vehicles over years. Those that have occurred are because of driver negligence and would have occurred between two vehicles of the same class because of driver negligence. Traffic accidents occur because of driver negligence and not because there are two difference classes of vehicles driving on a Forest road. It is the driver that causes the accident not the vehicle. Remember, it is not guns that kill people or the bullets either. It is the person that fires the gun that kills the other person. The same rational should to be used by the Forest Service in their analysis of the roads for mixed use. They need to look at the accident records for the particular roads when they are completing their analysis.

In my opinion the language in the document provides cautious direction and recommendations without stating absolutes. It describes several procedures that may be followed for converting ML 3 roads, and has direction especially for roads that are more than 3 miles in length. But it does not state anywhere that any Maintenance Level 3 Roads are prohibited from being classified for mixed use. Even the portion of the text describing the language from the Office of the General Council provides guidance but does not state absolutes or prohibit changes of ML 3 roads to mixed use.

It looks to me like they have made the Forest Service work harder to complete the task of analyzing and gaining approval to change the classification of these roads. It has not prevented them from making the changes. I think that the Forest Service should get on with the job of reclassifying and requesting changes of the classification of the roads that have been requested to be changed to Mixed Use.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as “highways” under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

Analysis for additional Level 3 road segments for mixed use or additional routes to provide alternate loop completion is an option for the future.

Comment 2

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Memo titled: Region Five Direction – Mixed Used Roads. Dated: June 20th, 2007 and August 21, 2006.

Letter 214

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Request for confirmation of receipt of letter

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

We [The Wilderness Society, et. al.] agree with former Forest Service Chief Dale Bosworth that unmanaged off-highway vehicle (OHV) use is one of the "four key threats" affecting our nation's forests and should be "one of the highest priorities for the agency." Unmanaged OHV use has resulted in unauthorized roads and trails, increased soil compaction and erosion, increased sedimentation, water quality degradation, the spread of noxious weeds, increased fire risk, damage to cultural resources, habitat destruction and fragmentation, increased disturbance to sensitive wildlife, and conflict among users. Consequently, we strongly support the goals of the agency through this public process to prohibit widespread cross-country travel and to designate roads, trails, and areas for OHV use.

Comment 2

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We [The Wilderness Society, et. al.] find the DEIS to be inadequate in following the regulations established for travel management and in addressing the environmental impacts associated with the current and proposed transportation systems. We request that these deficiencies be addressed and resolved in a revised DEIS or that route designations be strictly limited[.]

Comment 3

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We [The Wilderness Society, et. al.] support the prohibition of widespread cross-country travel by motor vehicles. Without this prohibition, travel management on the Plumas National Forest would run contrary to the Executive Orders on the Use of Off-Road Vehicles on Public Lands, the Travel Management regulations, and the Sierra Nevada Forest Plan Amendment.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

The Plumas National Forest has improperly proceeded to carry out route designation under Subpart B of the Travel Management regulations without first following the requirements under Subpart A. Specifically, the Forest has not: a) identified the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands; b) identified the roads under their jurisdiction that are no longer needed to meet Forest resource management objectives, and that, therefore, should be decommissioned or considered for other uses, such as trails; and c) completed a science-based Travel Analysis to inform these decisions.

Response

The Travel Management Rule is comprised of three parts:Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline.

Comment 5

Action: Cumulative/Combined Effects

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

Nor is the Forest using Travel Analysis to inform motor vehicle route and area designations under Subpart B of the Travel Management regulations; there is no comprehensive, broad-scale, science-based analysis of system roads and motorized trails to determine whether the transportation system designated for motor vehicle use meets resource and other management objectives adopted in the Forest Plan, meets applicable statutory and regulatory requirements, reflects long-term funding expectations, minimizes conflicts among forest visitors, and minimizes adverse environmental impacts. The Forest is completing Travel Analysis only for the designation of unauthorized routes. Due to this deficiency, cumulative environmental impacts of the designated motor vehicle route system are not fully addressed.

Response

The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and are not subject to them; however, future projects will all include travel analysis. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project specific analyses are completed, the Forest will proceed with a separate NEPA process informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 6

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

The Forest has not considered our scoping comments related to seasonal wet-weather closures of native surface roads to reduce erosion and sedimentation, to lower road maintenance costs, and to reduce harassment and poaching of wildlife during times when they are most vulnerable. The Forest must give a reason in the DEIS for eliminating these comments from detailed analysis.

Response

The travel management regulations are comprised of three parts: Subpart A, Administration of the Forest Transportation System; Subpart B, Designation of Roads, Trails, and Areas for Motor Vehicle Use; and Subpart C, Use by Over-Snow Vehicles. Subpart A of the travel management regulations includes the provision referred to in this comment. The focus of this action is implementation of Subpart B, which requires the Forest Service to prohibit cross-country motor vehicle travel and designate a system of roads, trails, and areas for motor vehicle use. Subpart B of the travel management regulations was specifically developed to address the growing popularity and capabilities of OHVs and the effects of unmanaged OHV use on forest resources. The Forest Service recognized that "the magnitude and intensity of motor vehicle use have increased to the point that the intent of E.O. 11644 and E.O. 11989 cannot be met while still allowing unrestricted cross-country travel." 70 Fed. Reg. 68264, 68265 (Nov. 9, 2005). The Forest Service developed the current action and alternatives to respond to this new direction. Implementation of Subpart B will have immediate, on-the-ground effects, which are the subject of the analysis contained in this FEIS.

Comment 7

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

The Forest is arbitrarily limiting the scope of the planning effort. The agency has considered comments from the public related to changing the class of vehicles that are allowed on system roads, but has refused to consider public comments related to the closure or decommissioning of system roads. Due to this deficiency, a full range of reasonable alternatives has not been evaluated.

Response

The action and alternatives considered in this EIS were determined by the stated purpose and need. In this project the purpose and need is to implement Subpart B of the travel management regulations and of particular consequence, Subpart B's prohibition on cross-country travel. Because this prohibition will eliminate many popular and important recreational opportunities, the Forest Service also identified the need to consider potential additions to the NFTS in order to continue to provide motorized recreation opportunities and access to non-motorized recreation activities. Closure and decommissioning of roads will be conducted with future NEPA documents on a project-level basis as new areas are analyzed for large vegetation management projects.

Comment 8

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

The Forest has not provided adequate or reliable documentation for what they consider to be the "baseline" of the current transportation system. The Forest has not provided Decision Notices, Records of Decision, National Environmental Policy Act (NEPA) documentation, Road Management Objectives, or funding allocation data for putative system routes in its jurisdiction. The Forest is, therefore, unable to provide convincing evidence that all of the routes in the INFRA database were designed to be open for long-term, public motorized recreation. Moreover, routes that are in the INFRA database and listed as routes that are currently closed (or are recommended for closure) to motor vehicles are designated as open to motor vehicles on the maps depicting the Alternatives.

Response

The forest transportation system has developed through both active management and decision making over time, both pre and post NEPA. The baseline system represents those routes included in the forest transportation atlas, roads with FS signing and numbering, and documentation of maintenenance and other management activities. The NFTS was reviewed prior to the start of this project, and was established as the baseline. NEPA documentation and other agency documentation is required for 6 years. As a result, many NEPA decisions on the NFTS predate this timeframe. Record of maintenance and other management actions are part of the determining factors of what roads and trails are part of the NFTS. The baseline changes year to year based on project level decisions. As with any databases, the INFRA database is sometimes changed administratively and updated at various times.

Comment 9

Action: Methodology and Assumptions

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

The analysis of environmental impacts is insufficient under NEPA because no method of analysis is given for determining which unauthorized routes were added to the transportation system. While the DEIS provides a plethora of information on possible environmental impacts and future mitigations, the decisions concerning which new routes to designate are arbitrary.

Response

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1).

Alternative 3 responds to non-motorized recreation interest in "Citizen Inventoried Roadless Areas (CIRAs)" proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each

route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 10

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

Designation of certain unauthorized routes conflicts with the Executive Orders on Off-highway Vehicle Use, the Travel Management regulations, the Plumas National Forest Land and Resource Management Plan (LRMP), national environmental laws or regulations, or a combination of the above.

Comment 11

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendix A and "Analysis Methodology" each Specialist Report Chapter 3.

We [The Wilderness Society, et. al.] believe, however, that the DEIS is flawed in the following ways:

The Forest did not perform adequate site-specific field checks of unauthorized routes. Because these routes are unofficial and many are user-created, these routes should be checked on site to ensure that there are no resource problems (or even if the routes exist) before they are designated for recreational motor vehicle use.

Response

Resource specialists for each resource (botany, cultural, watershed and soils, weeds and wildlife) gave each route an effects determination (Appendix A of the FEIS and the "Analysis Methodology" section for each specialist report in Ch. 3 of the FEIS). Appendix A provides a comprehensive assessment, identifying the route number, miles, effects determinations by resource and any mitigation measures (including the season of use when the trail would be open and any mitigations that would be implemented on trail prior to publication in the MVUM, allowing public use. A description of each rating's meaning to the resource effected may be found at the end of Appendix A.

Comment 12

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

II. Remedy

The Plumas National Forest should immediately conduct a broad-scale, science-based Travel Analysis as required by the Travel Management regulations, document its findings in a Travel Analysis report, identify the minimum transportation system, and publish a list of routes recommended for decommissioning. After these steps have been completed, the agency should develop a new proposed action and analyze this proposal along with a full range of reasonable alternatives in a new DEIS.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject

to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 13

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

In the event the Forest insists on designating routes under Subpart B before performing the required analysis under Subpart A, the only option that preserves a semblance of the required process and protections of the applicable regulations is to adopt a modified version of Alternative 3, which would designate no new user-created or unauthorized routes. The Forest should, however, add to this Alternative seasonal wet-weather closures. Furthermore, the route designations and their depiction on a Motor Vehicle Use Map (MVUM) under this modified Alternative 3 should be limited to those motorized routes which can be justified through appropriate documentation showing that they were designed to be used by the public for long-term motorized recreation. Once Travel Analysis is completed for all system routes and a minimum system is achieved by decommissioning unneeded routes, the Forest may then consider the addition of unauthorized routes.

Response

This project does not revisit previous decisions made on NFTS trails. As discussed in the assumptions at the beginning of Chapter 3, previous decisions on the NFTS do not need to be revisited to implement the Travel Management Rule or the MVUM. That is, the NFTS contains existing facilities (roads and trails) that either underwent NEPA or predate NEPA.

Comment 14

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

III. Purpose and Need

The purpose and need statement is insufficient to set up a proper and complete analysis.

The Purpose

We [The Wilderness Society, et. al.] believe that the Forest is improperly restricting its purpose and need statement to reflect only Subpart B of the Travel Management regulations. In doing so, the Forest is sidestepping regulations that have been in place since 2001 and is missing an important opportunity to evaluate the entire transportation system. Furthermore, we believe the Forest has misinterpreted the purpose of Subpart B of the Travel Management regulations in writing its purpose and need statement.

The purpose of proposed travel management actions under 36 CFR 212 Subpart B is clearly established: to designate roads, trails, and areas for motor vehicle use and prohibit motor vehicle use off those designated routes and areas (i.e., ending widespread cross-country travel). The general criteria for designating roads, trails, and areas are also clearly established in Subpart B: the responsible official shall consider effects on "natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated, and the availability of resources for that maintenance and administration." The Forest, however, has elevated to the same level as ending cross-country travel the need to "provide motor vehicle access to dispersed recreation opportunities" and the need to "provide a diversity of motorized recreation opportunities." But nowhere in Subpart B of the Travel management regulations is it stated that providing motorized recreational opportunities is a primary need. In fact, the term "motorized recreation" is never used in Subpart B. The term "motor vehicle use" is used, but only in the context of the objectives of minimizing damage to natural resources, harassment of wildlife, and conflict among users.

Response

The purpose and need 1, pertaining to Subpart B, does not refer to "motorized recreation" as the comment states.

It refers to "motor vehicle" in the same context as the commenter uses.

Comment 15

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

III. Purpose and Need

The Need to Complete Travel Analysis

In our [The Wilderness Society, et. al.] view, travel planning must evaluate and address the environmental, social, and cultural impacts associated with unauthorized routes and system roads (Maintenance Levels 1-5), trails, and areas, as identified through a landscape-scale, science-based Travel Analysis.

The U.S. Congress agrees. In the FY 2009 Omnibus Appropriations Act, Congress instructs the U.S. Forest Service to "comply fully with all travel management regulatory requirements, particularly the science-based analysis in 36 CFR 212.5 (b) (1), the identification of unneeded roads in 36 CFR 212.5 (b) (2), and the criteria for designation in 36 CFR 212.55 (a) and (b). The Committees expect the Forest Service to identify priorities, and associated resource requirements, to fully comply with the regulatory requirements of 36 CFR 212.5 (b) (1) and (2)."

Analyzing impacts to ecological and cultural resources across the entire transportation system is a critical factor in determining the minimum road system as envisioned by 36 CFR 212.5 (b) (1). Travel Analysis should be used to determine the minimum system and to identify unneeded roads that should be decommissioned or considered for other uses, such as trails. The Plumas National Forest has excluded from its purpose and need statement the need to conduct travel analysis to inform decisions regarding route designations, determining a minimum system, and identifying unneeded routes for decommissioning. We believe that this interpretation of relevant guidance is erroneous and lacks common sense. We believe that analysis and planning to determine the minimum route system should inform, and thus precede, designation of new routes for motorized travel.

The Route Designation Guidebook for National Forests in California directs Forests to use Travel Analysis to evaluate the proposed route additions and the current transportation system:

Travel analysis is a pre-NEPA analysis that helps to identify proposals for changes in travel management direction and supports the environmental analysis associated with those proposed actions....The main issues for travel analysis are probably: 1) recreational use of motor vehicles on NFS roads, NFS trails and areas of NFS lands, 2) the addition of non-NFS roads and trails to the NFS transportation system, 3) motorized mixed use, 4) reduction of road maintenance levels, and 5) elimination of un-needed NFS roads and trails (emphasis added).

The recently published travel planning directives state that "travel analysis assesses the current forest transportation system and identifies issues and assesses benefits, problems, and risks to inform decisions related to identification of the minimum road system per 36 CFR Part 212.5 (b) (1) and designation of roads, trails and areas for motor vehicle use per 36 CFR Part 212.51."

Unfortunately, the new directives also grant an exemption which relieves Forests that have released proposed actions before January 8, 2009, from the obligation to perform the Travel Analysis that the agency believes "can and should be used" to designate motorized routes. We could not disagree more strongly with this exemption. It is our opinion that the directives are meant to instruct Forest Service employees how to implement Travel Management regulations, not how to avoid them. We (and the U.S. Congress) believe that the exemption in the final directives is contrary to the Travel Management regulations at 36 CFR 212.

We would like to be involved in travel analysis and are ready to assist in any efforts to evaluate the current transportation system. Congress, for the second consecutive year, has provided funding ($50,000,000) through Legacy Road and Trail Remediation which is specifically authorized for decommissioning work and can be used for conducting travel analysis. The President's economic stimulus package also provides funds which may be used for road decommissioning. Even in the event that the Forest chooses Alternative 3 and designates only the current transportation system, we expect an explicit statement in the Record of Decision that Congress has directed the Forest to conduct a travel analysis and to identify unneeded roads, and hence the Forest will be amending the travel plan within one year following a comprehensive science-based roads analysis.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the

Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 16

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Ch. 2, Alternatives Considered in Detail

III. Purpose and Need

The Need to Protect Forest Resources

All current direction and authority that allow, restrict, and prohibit vehicle use off roads on National Forest lands are tiered from Executive Order (E.O.) 11644, signed by President Nixon in 1972, and modified by President Carter's E.O. 11989 in 1977. These executive orders should be the guiding principles for the purpose and needs related to OHVs and route designation. The Orders state that the route designation procedures "will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands." In accomplishing this broad goal, the executive orders specifically require that the designation of motorized areas and trails shall be in accordance with the following:

- Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.
- Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.
- Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.
- Areas and trails shall not be located in officially designated Wilderness Areas.

The Travel Management regulations carry forward relevant language from the Executive Orders which requires minimization of damage to soil, watershed, vegetation, and other forest resources; minimization of harassment of wildlife and significant disruption of wildlife habitat; and minimization of conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands, and conflicts among different classes of motor vehicle uses of National Forest system lands or neighboring Federal lands.

Response

The broad goals as stated in the comment are in alignment with the purpose and need for this project. In addition,

Alternative 3, 4 and 5 (Preferred Alternative), were all developed in accordance with the broad goals as stated by the comment. The Environmentally preferred alternative is Alternative 3, where no routes are addd to the NFTS.

Alternative 4 is the next environmentally preferrable alternative responding to non-motorized recreation interest in "Citizen Inventoried Roadless Areas (CIRAs)", minimizing natural resource impacts by dropping all routes given the effect determination of high or extreme by any of the resource specialists. This alternative adds no motorized routes to the Jacks Critical Aquatic Refuge. This alternative does not propose trails where resource concerns require extensive trail mitigation, those with "high" and "extreme" effects determinations are dropped.

Alternative 5, the preferred alternative, responds to the issue of access, motorized recreation opportunity, and natural resource protection. Additionally, it adds 10 miles of routes that were identified during scoping that would better provide access and motorized recreation opportunity. This alternative drops routes that were give an "extreme" effect determination.

Comment 17

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Chapter 1--Purpose and Need, Background

III. Purpose and Need

Recommended Changes to the Purpose and Need Statement

The Plumas National Forest, however, in the statement of purpose and need chooses to place the greatest emphasis for designating routes on providing motorized recreational opportunities—which was not the principal goal of either the Executive Orders or the Travel Management regulations. The heart of these two guiding documents —minimizing social and environmental damage from motor vehicles—is not equally represented or emphasized.

Response

The Forest has two purpose and needs. One to regulate unmanaged motor vehicle travel by the public and the other to provide motor vehicle access to dispersed recreation opportunities and provide for a diversity of motorized recreation opportunities. As stated in the Chapter 1, "Background" Section, "Unmanaged motor vehicle use, particularly OHV use, has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Compaction and erosion are the primary effects of motor vehicle use on soils. Riparian areas and aquatic dependent species are particularly vulnerable to damage from motor vehicle use. Unmanaged recreation, including impacts from OHVs, is one of “Four Key Threats Facing the Nation’s Forests and Grasslands.” (USDA Forest Service, June 2004)." The Forest is very concerned about resource damage caused by unrestricted off-highway vehicle use.

Comment 18

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] recommend strongly that you adjust the purpose and need statement, as follows, to reflect more accurately the intent of the Executive Orders, Subparts A and B of the Travel Management regulations, and the purpose of travel planning.

The need to eliminate widespread cross-country travel and move to a system of designated roads, trails, and areas consistent with the Travel Management regulations and the Executive Orders on use of off-road vehicles on public lands[.]

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 19

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] recommend strongly that you adjust the purpose and need statement, as follows, to reflect more accurately the intent of the Executive Orders, Subparts A and B of the Travel Management regulations, and the purpose of travel planning.

The need to address degradation of environmental, social, and cultural resources associated both with user-created routes and current system roads, trails, and areas, as identified through Travel Analysis[.]

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject

to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 20

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] recommend strongly that you adjust the purpose and need statement, as follows, to reflect more accurately the intent of the Executive Orders, Subparts A and B of the Travel Management regulations, and the purpose of travel planning.

The need to—by way of a broad-scale, science-based analysis—"identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands" and identify roads that are "no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails"[.]

Response

The Travel Management Rule is comprised of three parts:Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach each large vegetation management project with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 21

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] recommend strongly that you adjust the purpose and need statement, as follows, to reflect more accurately the intent of the Executive Orders, Subparts A and B of the Travel Management regulations, and the purpose of travel planning.

The need to provide opportunities for motorized and non-motorized recreation within the carrying capacity of the land (minimizing damage to soil, watershed, vegetation, cultural sites, and other resources of the public lands; and minimizing harassment of wildlife or significant disruption of wildlife habitats)[.]

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 22

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] recommend strongly that you adjust the purpose and need statement, as follows, to reflect more accurately the intent of the Executive Orders, Subparts A and B of the Travel Management regulations, and the purpose of travel planning.

The need to adjust both the core transportation system and recreation travel network in light of funding limitations for maintenance, monitoring, and enforcement[.]

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 23

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [The Wilderness Society, et. al.] recommend strongly that you adjust the purpose and need statement, as follows, to reflect more accurately the intent of the Executive Orders, Subparts A and B of the Travel Management regulations, and the purpose of travel planning.

The need to address public safety concerns, user conflicts, private property rights, lost non-motorized recreational opportunities, and impact to natural soundscapes and air quality that have arisen or might be expected to arise given recent trends in motorized use.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 24

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

IV. No Action/Baseline

Under the No Action Alternative in the DEIS, no changes would be made to the current National Forest Transportation System (NFTS), no cross-country travel prohibition would be put into place, the provisions of the Travel Management regulations would not be implemented, motor vehicle travel by the public would not be limited to designated routes, unauthorized motorized trails would continue to have no status, and no Motor Vehicle Use Map would be produced.

Widespread cross-country travel is prohibited by the Travel Management regulations, and by the Sierra Nevada Forest Plan Amendment of 2004, which requires forests to "prohibit wheeled vehicle traffic off designated routes, trails, and limited off-highway vehicle (OHV) use areas." While we [The Wilderness Society, et. al.] understand that NEPA allows consideration of a No Action Alternative which is contrary to current law, we do not believe that such an alternative should serve as the sole baseline for comparison of the Action Alternatives. We believe, as does the Plumas NF, that the Action Alternatives must be compared among each other and to an alternative which designates only those routes that are currently in the NFTS, in this case, Alternative 3. The threshold for determining whether a route is currently in the transportation system should be consistent and rigorous. In our view, the baseline transportation system should be limited to those current motorized system routes that are supported by prior NEPA analyses or decision documents that justify their inclusion on maps and in spatial databases. We believe that any routes lacking documentation (including routes which were constructed or came into being before NEPA was enacted) should be analyzed as new unauthorized routes, in recognition of the fact that there is no record of administrative decision or analysis addressing the environmental impacts of motor vehicle use on these routes.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 25

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

IV. No Action/Baseline

An accurate accounting of the true extent of the current transportation system is a critical step in setting the appropriate baseline for analysis. We are concerned that a significant discrepancy may exist between what the Forest Service is calling its "system" and the routes which are supported by appropriate documentation. We [The Wilderness Society, et. al.] would expect the Forest Service to perform a comprehensive inventory of its past transportation decisions as part of Travel Analysis. In our March 3, 2008, "scoping" comments we requested, but did not receive, this documentation.

As part of its description of the legal baseline, the Plumas National Forest should include a table identifying the specific documentation or evidence which supports the inclusion of all existing routes in the transportation system. Such documentation would include NEPA analysis and decision documents, approval of Road Management Objectives (RMOs) or Trail Management Objectives (TMOs), or records establishing the expenditure of normally-appropriated maintenance funds on a specific route. Routes lacking such documentation should be marked accordingly. In scoping comments we included a sample spreadsheet to serve as an example.

Response

The Travel Management Rule is comprised of three parts:Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach each large vegetation management project with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project

specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 26

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

IV. No Action/Baseline

INFRA, the database used by the USFS to document and track its transportation system, is one of the few places where detailed information regarding the USFS road and trail system can be found. It is logical that this database be used as a starting point for travel planning. However, there are certain roads in INFRA that should not be listed as part of the baseline travel system. We [The Wilderness Society, et. al.] have included in Appendix A an Excel spreadsheet of roads in the INFRA transportation database (received February 3, 2009, by The Wilderness Society) that have, at some point in the past, been determined to be unnecessary or inappropriate for long-term public motor vehicle travel. These routes should not be treated as open system routes merely because they exist on the ground or have been entered into Infra. These routes should not appear on the MVUM without adequate justification and environmental analysis.601

Response

The Travel Management Rule is comprised of three parts:Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach each large vegetation management project with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 27

Action: Mapping, GIS

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

IV. No Action/Baseline

In Appendix A, the Excel spreadsheet tab labeled "Route Status" lists all roads that are labeled in INFRA as "converted" (defined as a route that was no longer needed and has been converted to another use) or "decommissioned" (defined as a route that was no longer needed and has been removed from service). These roads should not appear on the Motor Vehicle Use Map because they are no longer system routes open to motor vehicles. The tab labeled "Operating Maintenance Level" lists all of the roads that are labeled in INFRA as "basic custodial care (closed)" (defined as an intermittent service road closed to vehicular traffic). These roads should not appear on the Motor Vehicle Use Map because they are not currently open to motor vehicles. The tab labeled "Service Life" lists all of the roads that are labeled in INFRA as "short term service" (defined as a road for short term use—including temporary roads), "intermittent stored service" (defined as an intermittent service road closed to traffic), or "intermittent term service" (defined as a road closed to vehicle traffic between periods of use; the closed period must exceed one year). Roads in these categories were not constructed for long-term public motor vehicle recreation and should not appear on the MVUM without justification and environmental analysis. The tab labeled "Objective Maintenance Level" lists all roads that are labeled in INFRA as "basic custodial care (closed)," "converted," or "decommissioned." These roads should not appear on the Motor Vehicle Use Map because the Forest has determined that their objective for these roads is to close them to motor vehicles.

We [The Wilderness Society, et. al.] have checked a few sample routes that appear on the DEIS Alternative Maps against the routes in Appendix A and have found that routes that should be closed to motor vehicles currently appear on the DEIS maps. It is crucial that these errors be remedied.

Response

In preparation for developing the MVUM, the Forest is actively updating the INFRA database to reflect what is on the ground.

Comment 28

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS/FEIS Chapter 1--Non-significant Issue

V. Range of Alternatives

The National Environmental Policy Act requires a "hard look" at "all reasonable alternatives," which would include one or more alternatives emphasizing a minimum transportation system which is streamlined, non-redundant, and protects natural resources. A range of alternatives that does not include the minimum transportation system is not sufficient under NEPA. The Forest Service Handbook guides managers to "develop other alternatives fully and impartially…[[and]] ensure that the range of alternatives does not prematurely foreclose options that might protect, restore, and enhance the environment." There is much legal precedent to guard against an insufficient range of alternatives. By not considering in detail our comments advocating that the Forest perform Travel Analysis to determine a minimum transportation system, the Forest is foreclosing options that might protect, restore, or enhance the environment.

In addition, the Plumas National Forest has arbitrarily constrained the range of alternatives in the DEIS by not considering in detail public comment regarding the deletion of motor vehicle routes from the system. The Forest maintains that they are dealing only with "limited changes" to the transportation system. But the Forest does not define those limits. The Forest is considering changes to vehicle class that may use system routes, but is not considering fully the alternative submitted by the Wilderness Society et al. during scoping. The DEIS gives no convincing rationale for this decision. The Forest is giving the impression that the DEIS is a foreordained formality by not rigorously exploring all reasonable alternatives.

We [The Wilderness Society, et. al.] request that our route closure recommendations be included in an alternative in a revised DEIS.

Response

This alternative was not considered because the Forest is addressing Subpart B and cross-country travel in this planning effort. The National Forest Transportation System is not being analyzed at this time. The responsible official has determined that NFTS roads and trails will not be considered for repair, reconstruction or decommissioning as part of this proposal. Re-evaluation of previous decisions that established the current NFTS are also not part of this proposal. Decommissioning occurs on an ongoing basis when roads and trails are no longer needed or are relocated for resource protection. Typically this occurs as part of vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects.

Comment 29

Action: Cumulative/Combined Effects

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

VI. Direct, Indirect, and Cumulative Environmental Impacts

NEPA requires federal agencies to assess the direct, indirect, and cumulative environmental impacts of proposed actions, taking a "hard look" at environmental consequences, and performing an analysis commensurate with the scale of the action at issue. Each alternative should address, in the environmental consequences section of the DEIS, the potential impacts to the following natural resources: soil; riparian areas; water quality; noxious weeds; fire; sensitive, threatened, and endangered plants; sensitive, threatened, endangered, game, and management indicator animal species; fisheries; air quality; and natural quiet. The analysis should be informed by and make specific reference to the best available science. If information is lacking, the precautionary principle should be used to protect natural resources.

The Plumas DEIS makes a fundamental error by placing existing system routes outside of its direct and indirect impacts analysis. To justify this action, the Forest relies mistakenly on Travel Management regulations which state that the "responsible official may incorporate previous administrative decisions regarding travel management made under other authorities, including designations and prohibitions of motor vehicle use, in designating National Forest System roads, National Forest System trails, and areas on National Forest lands for motor vehicle use under this Subpart."

This justification is misguided for two reasons: 1) We have no record of previous administrative decisions regarding travel management in spite of our request (March 3, 2008 – "scoping" comments) to the Forest to provide us with a summary of those decisions. The only information the Forest has provided is INFRA transportation data (that lacks

the crucial and relevant columns of data labeled "EVENT, "EVENT_SUBTYPE," and "EVENT_DATE," which would have described the transportation planning documentation, decision documentation, and the dates on which these decisions were made). 2) Even if we had received records of previous administrative decisions regarding travel management, this does not relieve the Forest from analyzing, in the context of this proposal, the direct, indirect, and cumulative effects of these previous decisions on social, cultural, and natural resources. The Travel Management regulations allow the Forest to incorporate previous decisions into designations of those routes (which is not a NEPA process); the regulations say nothing of incorporating previous decisions into the analysis of the impacts of those routes.

We [The Wilderness Society, et. al.] suspect that many existing so-called "system" routes have never been subject to NEPA analysis for direct and indirect impacts to natural and cultural resources. Moreover, those routes for which the Forest might be able to provide NEPA decision documents or other previous administrative decisions would need to be analyzed for impacts given their role as long-term recreational motor vehicle routes that would appear on a widely-available Motor Vehicle Use Map and not be analyzed solely for impacts from their use at the time of construction.

Finally, by not conducting travel analysis on and considering the environmental impacts of the entire transportation system, the assessment of cumulative impacts is deficient under NEPA.

Response

According to Title 40, Code of Federal Regulations, section 1508.8, direct effects are defined as effects, which are caused by the action and occur at the same time and place. The actions in this project are described under each alternative and include elimination of cross-country travel as well as additions of various routes to the NFTS. Indirect effects are defined as effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable (40 CFR 1508.8).

Indirect effects may include induced change i.e., growth, or patterns of land use, population density or effects on air and water and other natural systems (40 CFR 1508.8).

Cumulative impacts (effects) are defined as the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 220.3).

The specialist reports analyze the direct, indirect and cumulative effects consistent with these regulations.

Comment 30

Action: Enforcement/Funding/Staffing

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Ch. 3, Transportation Facilities, Measurement Indicator 2: Transportation System Affordability

VII. Budget for Transportation System and Administration

Both Subparts A and B of the Travel Management regulations address the affordability of the Forest transportation system. Subpart A requires the Forest to determine the minimum system needed to "reflect long-term funding expectations." Subpart B requires the Forest to "consider effects on…the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration." The Forest Service Manual further states that "[a]dministrative units and ranger districts should avoid adding routes to the forest transportation system unless there is adequate provision for their maintenance."

The current road inventory for the Plumas National Forest is 4,137 miles. According to the DEIS, the annual maintenance cost of the road system is $2,369,215. Yet the Plumas NF expects to receive only $1,900,000 per year in maintenance funds. The annual shortfall is $469,000. The Forest states that the shortfall means that some roads are not maintained on schedule and scheduled maintenance is completed only on the roads with the most use.

The Plumas NF expects to receive $25,000 in Forest Service appropriated funds for motorized trail maintenance. Trail maintenance money has been declining each year, according to the DEIS. Yet the preferred alternative would designate a motorized trail system of 381 miles, which would cost $70,000 annually to maintain. The annual shortfall would be $45,000. Alternative 3, however, would only cost $26,000 per year.

There is simply no justification for designating new routes when the Forest has such a significant maintenance backlog. Unmaintained and degraded roads, when open to motor vehicle use, may lead to substantial erosion, may collapse, and may cause serious safety problems.

The analysis of affordability in the DEIS does not address how the Forest will reduce the maintenance backlog or even how they will prevent the increase of a maintenance backlog. In fact, the proposed action has the second largest maintenance cost of any Alternative. The Forest needs to explain how they will reduce the maintenance backlog or admit that they are further contributing to it.

The Forest attempts to justify the inclusion of new routes by saying that trails added to the system would be maintained thereby reducing the amount of damage inflicted on other resources, as opposed to those alternatives where fewer new routes are designated. This argument is spurious for two reasons: 1) the Forest has no funds to maintain these new trails and 2) ummaintained trails that are open to motor vehicle use will cause more resource damage than unmaintained trails that are closed to motor vehicles and allowed to heal naturally.

The Forest should follow the handbook guidelines and not open any new routes that it cannot afford to maintain.

Response

The assumption, as explained in the Transportation Environmental Consequences section, is that the cost to implement the proposed action will be covered by obtaining grant funding and through volunteer labor.

Comment 31

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wetlands

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

A. Water Quality

OHV use can cause significant impacts to riparian areas and can have negative impacts on water quality and soil properties and vegetative cover, which can result in accelerated rates of erosion and sedimentation and elevated levels of turbidity in affected watersheds. These impacts can be minimized and often avoided by prohibiting routes and OHV use in and near riparian areas, yet the Forest Service is doing just the opposite by proposing to designate routes within riparian areas.

The DEIS fails to analyze the impacts of the OHV trail designations on the specific riparian areas affected. The Plumas DEIS does not disclose how these OHV designation decisions will minimize impacts to riparian areas.

Response

See sections 3.5.3.1 and 3.5.6.2. Adverse effects for soil and water resources (ratings “High” or “Extreme”) in riparian areas were determined when delivery of route-generated sediment to stream channels was observed or when a route was observed to be capturing a stream channel. If the effects could not be mitigated within the scope of this FEIS, the route was rated “Extreme.” The Riparian Conservation Objectives (RCO) Analysis, presented in Appendix A of the Soil and Water Resource Report, describes how the proposed actions, including the addition of trails to the NFTS, are consistent with the RCOs included in the Record of Decision for the 2004 Sierra Nevada Forest Plan Amendment.

Comment 32

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Air Quality and Noise

Disposition: Resolved: Comment acknowledged; does not provide new information

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

B. Air Quality

The Plumas DEIS fails to fully address issues of air quality. The Forest Service must prepare a full-fledged, comprehensive quantitative analysis; acknowledge and quantify background concentrations of pollutants in the area; analyze whether the activities permitted in the Plumas National Forest would lead to a significant deterioration of air quality; prepare a more comprehensive inventory and then perform dispersion modeling to understand impacts; and include plans for protecting and restoring air quality in the region.

The existence of designated routes and travel of automobiles and OHVs on designated routes will generate significant amounts of fugitive dust which will negatively affect air quality in the region. The Plumas DEIS and its air quality emissions inventory have completely failed to consider such emissions. The Plumas DEIS contains no such analysis; this quantification and modeling must be conducted in order to understand whether the Plumas National Forest’s plans will comply with federal and state air quality standards and to know what impact they may have on human health, wildlife, vegetation, water bodies, and climate.

The Forest Service must actually estimate the number of vehicles that will travel these routes and the number and mileage of routes that will be open so that it can correctly inventory the fugitive dust that is likely to result. If every unpaved route identified in the Plumas DEIS were closed, and the soil subsequently stabilized, there would be much less fugitive dust compared to the amount likely to result from implementation of the preferred alternative. If only one or two unpaved routes were open to vehicular travel in the entire planning area the fugitive dust generated by these roads would likely be much less than the fugitive dust that will be generated by miles of designated routes that are proposed for vehicular traffic in the Plumas DEIS. The Forest Service must improve the Plumas DEIS by including a comprehensive inventory of fugitive dust generated by designated routes (both when being traveled by vehicles and as a result of wind erosion) and the engine emissions generated by the vehicles traipsing these routes

In summary, the Plumas DEIS does not adequately analyze the impacts to air quality that will result from the activities planned and permitted in this document. These failures are contrary to NEPA, which requires that the Forest Service disclose the impacts of the activities it is analyzing. The Forest Service must prepare a comprehensive emissions inventory, which includes fugitive dust emissions, and then model these figures in near-field, far-field, and cumulative analyses. Without doing so, the Forest Service cannot know what impact these activities will have and whether it is complying with federal and state air quality standards.

Response

The EPA has set standards for emissions of non-road engines and vehicles (snowmobiles, ATVs, boats, etc). The standards set for emissions of oxides of nitrogen (NOX), hydrocarbons (HC), and carbon monoxide (CO) are to ensure compliance with the CAA, and to regulate those emissions that contribute significantly to the formation of ozone and carbon monoxide. Compliance with these standards requires manufacturers to apply existing gasoline or diesel engine technologies to varying degrees, depending on the type of engine (US EPA, 2002).

Comment 33

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

The FEIS should include analysis of the existing system roads and trails in order to determine which are appropriate for the unique impacts of vehicles used for OHV recreation, as well as to calculate the cumulative impact of the OHV route system. The range of alternatives is too narrow, as none of the action alternatives analyzes or considers reducing the number of miles of roads and trails currently in the system.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 34

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS states:

"When compared with Alternative 2, greater long-term (25-30 year) benefit to soil and water resources would occur under Alternative 3 because an additional 364 miles of unauthorized routes would be prohibited from motorized traffic. This would allow the passive re-vegetation of an additional 364 miles of unauthorized routes, resulting in these areas attaining much of their original hydrologic and geomorphic functions."

Given the limited alternatives analyzed in this DEIS, we favor Alternative 3, as it does not add any additional

routes to already environmentally stressed watersheds.

Comment 35

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

[C. Soil Resources and Hydrology]

The DEIS essentially dismisses soil impacts, stating that

1. OHV trails are part of the transportation system and thus soil productivity is not relevant; (p. 72)

2. The primary impact of erosion from OHV routes is the impact on water quality and riparian habitat.

The National Forest Management Act of 1976 requires the Plumas National Forest to "recognize the fundamental need to protect and where appropriate, improve the quality of soil, water, and air resources." The soil productivity of designated routes may not be relevant, but the potential for future productivity of currently impacted soils should be considered. The Final DEIS should consider the benefits of returning user-created routes to the productive land base.

The Travel Management project provides an opportunity to make decisions that will protect and enhance soil and water quality; it would be arbitrary and capricious and a violation of NFMA to choose an alternative that allows unnecessary degradation of soils and water to continue.

The Plumas NF manages non-point source pollution through implementation of prescribed best management practices (BMPs). (DEIS, p. 67) All NFS roads and trails open to OHV use are required to comply with these BMPs. There is no discussion or disclosure in the DEIS whether the existing PNF system roads and trails are in compliance with the BMPs. The Final EIS must include, at minimum, a summary of the BMP monitoring reports completed over the past several years. It is clear from Appendices F, G, and H of the Soils and Hydrology Report that it will take an enormous effort to achieve BMP compliance for the unauthorized routes proposed for addition to the system under Alternative 2. Analysis of compliance on system routes would allow the public to assess the probability of future compliance on routes added to the system.

Response

Section 3.5.6.2 has been revised to include consideration of the potential for future productivity of returning user-created routes to the productive land base. For all action alternatives, the revegetation of existing unauthorized trails is important for hydrologic function but amounts to little in terms of the amount of productive land on the Forest. For example, re-vegetation of 742 miles of existing unauthorized routes under Alternative 2 could restore productivity on, at most, 800 acres of PNF land (less than 0.07% of the Forest land base).

The requirement for BMP compliance on all routes proposed for addition to the NFTS under the project alternatives is described in section 3.5.2.

Comment 36

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS CH. 3, Transportation Facilities--Affected Environment

The DEIS fails to provide an economic analysis of the alternatives. The Final EIS must include an analysis of current and predicted budgets and existing deferred maintenance on roads and trails, and an explanation of how the mitigations and repairs on routes proposed for addition to the system will be financed, as well as the environmental consequences if adequate budgets are not available.

Response

In the FEIS Ch3., Transportation Facilities--Affected Environment there is a discussion of budgets past, present and future predictions as regards trail maintenance of roads and trails.

Comment 37

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The DEIS assumes a 5-year rotation for monitoring of routes. The Final EIS must explain how it determined that a 5-year monitoring schedule is sufficient to identify water quality problems that may occur as a result of OHV use on specific trails. It is unreasonable to assume that one monitoring schedule fits conditions on all routes. The DEIS includes no thresholds and no actions to be taken when thresholds are crossed. The Final EIS must disclose what actions must be taken when monitoring determines adverse impacts from an OHV route.

Response

The "Soil and water monitoring" section of chapter 2 has been revised to include information on baseline water quality for normal and acceptable trail conditions. Monitoring would first occur along routes that have been identified as a higher risk to soil or water resources. Trails for which monitoring indicates that BMP effectiveness rates inadequate will be further investigated to determine if additional or existing trail drainage or stream crossing mitigations should be implemented or repaired.

Comment 38

Action: Mitigation/BMPs

Resource(s): Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Sections 3.5.6.2, 3.5.6.4 and 3.5.6.5

The Soils and Water Resources Report "identifies mitigation measures needed to have a functioning trail system with minimal effects to these resources" (DEIS, p. 65); however, there is no commitment to adopt or implement these mitigations. The Final DEIS must make such a commitment.

Response

Only proposed NFTS facilities rated as "High" or "Extreme" have been observed to have adverse effects to soil and water resources. Soil and water effects for proposed facilities rated "High" can be mitigated. For all action alternatives, PNF watershed staff recommends that facilities rated "High" not be open to motorized traffic until these mitigations are in place. Proposed trails rated as "High" under alternative 5 would be designated as part of the NFTS but these routes would not be placed on the motor vehicle use map until the prescribed mitigations are in place. Under Alternative 5, motorized traffic would not be legal on these routes until proper installation of the mitigations is completed.

Comment 39

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS fails to disclose what the actual slope grades or percent slopes for each slope rating in Appendices F, G and H. The Final EIS must include a discussion of the maximum acceptable slope for OHV use on particular soil types.

Response

Appendices F, G and H of the Soil and Water Resource Report present the proposed trail slopes by range. Ranges are defined on the survey form presented in Appendix C of the Soil and Water Resource Report. Site specific survey data, including a break-down of the slope range for each segment of a particular proposed trail, is available upon from PNF ranger districts upon request.

Comment 40

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS fails to include a considered analysis of the suitability of different soil types for OHV traffic.

Response

Soil texture information is provided for each proposed trail in Appendices F, G, and H of the Soil and Water Resource Report. A minimum of two soil texture samples were typically collected on each proposed trail. See 3.5.3.1. The suitability of different soil types to OHV traffic is reflected in the soil and water resource rating for each proposed trail.

Comment 41

Action: Classification

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The sustainability of OHV roads and trails should be an important consideration in the designation process, but that analysis is missing from the DEIS. The project record includes tables that identify, route-by-route, current characteristics such as slope, soil type and impact rating for soil and water; however, there is no discussion of the suitability of the route for long-term OHV designation, given those characteristics.

Unless designed, hardened and maintained for OHV use, a route will continue to erode until down to bedrock. User-created routes were not engineered for vehicle traffic or properly hardened. Maintenance on such trails is difficult and often results in further impacts to soil resources. As stated in the Eldorado National Forest's 2008 Travel Management EIS, "Unauthorized routes … lack drainage structures, roll the grade only by chance, and may include unsustainably steep gradients. Because unauthorized routes were not constructed, treads are in loose topsoil rather than well-compacted subsoil. As topsoil is eroded, treads become entrenched, concentrating runoff and resulting in deeper erosion."

Response

See section 3.5.3.1. The soil and water effect ratings assume routine maintenance of trails added to the NFTS. Mitigations cited by the commenter from the Eldorado NF EIS, including surface drainage structures and switchbacks to mitigate unsustainable steep gradients, are prescribed to provide long-term sustainability of trails added to the NFTS. The "Soil and water monitoring" section of chapter 2 describes how trails that exhibit future erosion will be evaluated for further action or mitigation.

Comment 42

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.2

The DEIS fails to disclose that the Forest Service is subject to permitting requirements for its OHV trails and roads, as it must comply with requirements of both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. In this way, the DEIS fails to evaluate the environmental effects associated with noncompliance, as required by the National Environmental Policy Act. Should the Forest Service proceed without obtaining required permits, it violates the law. League of Wilderness Defenders v. Forsgren, 309 F.3 1181 (9th Cir. 2002).

A. Applicable Legal Standards

I. Porter Cologne Water Quality Act.

Under Porter-Cologne, any discharge or anticipated discharge of sediment from the Plumas NF OHV trails or routes to waters of the State must be reported in a report of waste discharge. Both the regional and State Boards have authority to issue WDRs to address such discharges whether or not a report has been filed by the Forest Service. Water Code section 13260(a)(1) states:

"All of the following persons shall file with the appropriate regional board a report of the discharge, containing the information which may be required by the regional board: (1) any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system."

See 23 Cal. Admin. Code [section] 2205. "'Person' includes any city, county, district, the state, and the United States, to the extent authorized by federal law." Water Code [section] 13050 (c) (emphasis added). "Waste" includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for purposes of, disposal." Id., [section] 13050(d). Waters of the state "means any surface water or groundwater, including saline waters, within the boundaries of the state." Id., [section] 13050(e).

Response

See section 3.5.2. California State and Regional Water Quality Control Board permitting for Waste Discharge Requirements are satisfied by Water Quality Management for Forest System Lands in California and the 1981 Management Agency Agreement (MAA) between the California State Water Resources Control Board (CSWRCB) and USDA, Forest Service, Pacific Southwest Region (R5). The program described in Water Quality Management for Forest System Lands in California includes BMPs certified by the CSWRCB and approved by US EPA. The MAA indicates that the program will constitute the basis of Regional Water Quality Control Board waivers for non-point source pollution. R5 and CA Regional Water Quality Control Boards are currently in the process of working with the State and Regional boards to modify the water quality management program and the MAA to reflect changes in state non-point source pollution control policy. However, the 1981 MAA has never been rescinded and remains in effect.

Comment 43

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.2

The DEIS fails to disclose that the Forest Service is subject to permitting requirements for its OHV trails and roads, as it must comply with requirements of both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. In this way, the DEIS fails to evaluate the environmental effects associated with noncompliance, as required by the National Environmental Policy Act. Should the Forest Service proceed without obtaining required permits, it violates the law. League of Wilderness Defenders v. Forsgren, 309 F.3 1181 (9th Cir. 2002).

ii. Federal Clean Water Act.

Under the federal Clean Water Act, any discharge of pollutants from a point source requires a federal NPDES permit. This is true for discharges from ditches, erosion gullies, and other "discrete conveyances" associated with OHV trails and roads. An NPDES permit is required when a party (1) discharges (2) a pollutant (3) to navigable waters (4) from a point source. Headwaters Inc v. Talent Mokelumne District, 243 F.3d 526, 532 (9th Cir. 2001); Committee to Save the Mokelumne River v. East Bay Municipal Utility Dist., 13 F.3d 305, 208 (9th Cir. 1993). Dischargers have an independent duty to apply for a NPDES permit. 40 C.F.R. [section] 122.21(a) ("Duty to apply. (1) Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section") (emphasis added); [section] 122.21(b) ("it is the operator's duty to obtain a permit"). California has been delegated authority to issue NPDES Permits in California.

"The term 'discharge' when used without quantification includes a discharge of a pollutant, and a discharge of pollutants." 33 U.S.C. [section] 1362(16). Discharge of a pollutant or pollutants means "any addition of any pollutant to navigable waters from any point source." 33 U.S.C. [section] 1362(12). The term pollutant is defined as including, among other examples, "solid waste . . . heat . . . rock, sand . . .and industrial . . . waste discharged into water." 33 U.S.C. [section] 1362(6). Sediment has been identified as a pollutant under the CWA. Pronsolino v. Marcus, 91 F.Supp.2d 1337, 1351 (N.D. Cal. 2000), aff'd, Pronsolino v. Nastri, 291 F.3d 1123 ((th Cir. 2002), cert. Denied, 539 U.S. 926; North Carolina Shellfish Growers Ass'n v. Holly Ridge Associates, LLC, 278 F.Supp.2d 654, 676 (E.D.N.C. 2003).

A "point source" is "any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants may be discharged." 33 U.S.C. [section] 1352 (14). Congress' definition of "point source" is "broadly construed" in order to effectuate the remedial purpose of the Clean Water Act. United States v. Earth Sciences, Inc., 599 F.2d 368, 373 (10th Cir. 1979); see also Community Ass'n for Restoration of the Environment v. Henry Bosna Dairy, 305 F.3d 943, 955 (9th Cir. 2002).

*"The term 'navigable waters' means the waters of the United States..." 33 U.S.C. [section] 1362(7). These include "intrastate lakes, rivers, streams (including intermittent streams) . . . the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce," and "tributaries of [those] waters." 40 C.F.R. [section] 122.2©, (e). Tributaries that flow intermittently and ephemeral streams are waters of the United States. Headwaters, 243 F.3d at 435. A discharge into an ephemeral tributary that is not flowing at the time but is expected to flow at some point is a discharge to waters of the United States. United States v. Ashland Oil and Transpo. Co., 504 F.2d 1317, 1329 (6th Cir. 1974) (where violation of the CWA is a discharge to a tributary, there is no threshold requirement to prove "that, in fact, the [pollutant] reached and polluted the navigable river"); United States v. Texas Pipeline Co., 611 F.2d 345, 347 (10th Cir. 1979) (oil spill into tributary a discharge to waters of the United States despite absence of any evidence that tributary was flowing at time of spill"); United States v. Moses, 2006 WL 1459846*7 (D.Idaho 2006) ("There is no requirement that there be water in the streambed at the time of the discharge").*

Storm water discharges are covered under section 402(p) of the CWA, which applies the NPDES permitting program to "industrial" storm water discharges as well as municipal discharges. 33 U.S.C. [section] 1342(p). As of 1994, all storm water discharges containing any pollutants must obtain a NPDES permit. The CWA provides no express exemption for either OHV routes or recreation areas.

Storm water discharges are covered under section 402(p) of the CWA, which applies the NPDES permitting program to "industrial" storm water discharges as well as municipal discharges. 33 U.S.C. [section] 1342(p). As of 1994, all stormwater discharges containing any pollutants must obtain a NPDES permit. The CWA provides no express exemption for either OHV routes or recreation areas.

The Forest Service is not exempted from these requirements. Under the existing arrangement with the State of California, "waste discharges from land management activities resulting in point source discharges, as defined by the Federal Water Pollution Control Act, will be subject to NPDES permit requirements, since neither the State Board nor the Regional Board has authority to waive such permits." Management Agency Agreement Between the State Water Resources Control Board, State of California and the Forest Service, United States Department of Agriculture, 1981, section 2 (b).

Response

Compliance with Clean Water Act requirements is described in section 3.5.2. Section 404 permit requirements for discharge or placement of fill in a stream channel that carries waters of the US, as administered by the US Army Corps of Engineers, will be appropriately satisfied prior to construction of any applicable mitigations prescribed by this FEIS for existing trails proposed for addition to the NFTS. Point source pollution control permitting is generally not applicable to this project because USFS transportation facilities, including drainage features on those facilities, are not considered point sources since those facilities do not channel pollutants to a discrete conveyance structure. California State and Regional Water Quality Control Board permitting for non-point source pollution, including storm water discharges, are satisfied by Water Quality Management for Forest System Lands in California and the 1981 Management Agency Agreement between the California State Water Resources Control Board and USDA, Forest Service.

Comment 44

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The DEIS fails to disclose that the Forest Service is subject to permitting requirements for its OHV trails and roads, as it must comply with requirements of both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. In this way, the DEIS fails to evaluate the environmental effects associated with noncompliance, as required by the National Environmental Policy Act. Should the Forest Service proceed without obtaining required permits, it violates the law. League of Wilderness Defenders v. Forsgren, 309 F.3 1181 (9th Cir. 2002).

III. Nonpoint Source Pollution

In addition to the permitting requirements for point source pollution, the Forest Service is required to meet its own water quality management plan for non-point source pollution. Among other things, for OHV this provides:

"Each Forest's OHV plan will:

- Identify areas, or routes, where OHV use could cause degradation of water quality.
- Establish baseline water quality data for normal conditions as a basis from which to measure change.
- Identify water quality standards and the amount of change acceptable.
- Establish monitoring methods and frequency.
- Identify controls and mitigation appropriate in management of OHVs.
- Restrict OHV use to designated routes."

Water Quality Management For Forest System Lands in California Best Management Practices, USDA Forest Service Pacific Southwest Region, September 2000, section 12.42.7.b., at p. 73.

Response

The Best Management Practice for Water Quality Monitoring of OHV Use (Practice 4-7) is described and applied to this FEIS in section 3.5.2. Information has been added to the "Soil and water quality monitoring" section of chapter 2. This information describes water quality standards, the amount of acceptable change, and baseline water quality for normal conditions.

Comment 45

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.2

The DEIS fails to disclose that the Forest Service is subject to permitting requirements for its OHV trails and roads, as it must comply with requirements of both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. In this way, the DEIS fails to evaluate the environmental effects associated with noncompliance, as required by the National Environmental Policy Act. Should the Forest Service proceed without obtaining required permits, it violates the law. League of Wilderness Defenders v. Forsgren, 309 F.3 1181 (9th Cir. 2002).

b. The OHV Routes Require These Permits.

Designated OHV trails and roads will discharge pollutants into waters of the United States through point source conveyances. Sediment is a pollutant, as are other contaminants such as petroleum products. The DEIS documents that these sources of pollution will reach waters of the United States through discrete point source conveyance.

I. Stream crossings are point sources of OHV pollutant discharge.

Stream crossings for OHV routes are point sources, as revealed in the DEIS:

"Road/stream crossings are significant sources of sedimentation on NFS lands. Even well-drained roads and trails will deliver some amount of surface-generated sediment to stream channels at crossings. For the approximately 50-200 feet of a well designed road or trail surface (length depending upon the slope of the terrain) that approaches the stream channel on both sides of the crossing, there is really no other place for surface-generated sediment to go but into the stream channel. " (p. 74)

The DEIS and Soil and Water Resources Report documents numerous instances of sediment entering streams, for which the Plumas should already have obtained a Permit for Discharge of Waste. Examples include:

"This concentrated runoff from poorly drained roads and trails – and the sediment carried with it - will eventually flow off of the surface at the next downgradient cross drain feature, stream crossing, or natural sag in the road profile. The outlets of surface drains (rolling dips, waterbars, or ditch relief culverts) that are spaced too far apart are typically observed to be significant and continual sources of sediment.' (DEIS, p. 73)

"All stream crossings have sediment to channel with very high to extreme slopes and rutting greater than 2" deep…" (Soils and Hydrology report, p. F6)

Directly related to this is the failure to comply with governing standards, which are intended to ensure that certain stream crossings will not act as point sources. The DEIS relies upon the Sierra Nevada Framework Plan Amendment, which provides Directions for Riparian Conservation Areas and Critical Aquatic Refuges. Among other restrictions, it stipulates that OHV Trails are not to be designated on Forest Service routes with rutting and live water stream crossings. Despite this prohibition, the DEIS contemplates that there will be designated OHV routes throughout the forest, some of which are "live stream crossings." The proposed project would designate OHV trails with an additional 64 live stream crossings.

Response

Compliance with Clean Water Act requirements is described in section 3.5.2. Section 404 permit requirements for point sources will be appropriately satisfied prior to construction of any applicable mitigations prescribed by this FEIS for existing trails proposed for addition to the NFTS. California State and Regional Water Quality Control Board permitting for non-point source pollution are satisfied by Water Quality Management for Forest System Lands in California and the 1981 Management Agency Agreement between the California State Water Resources Control Board and USDA, Forest Service.

Comment 46

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The DEIS fails to disclose that the Forest Service is subject to permitting requirements for its OHV trails and roads, as it must comply with requirements of both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. In this way, the DEIS fails to evaluate the environmental effects associated with noncompliance, as required by the National Environmental Policy Act. Should the Forest Service proceed without obtaining required permits, it violates the law. League of Wilderness Defenders v. Forsgren, 309 F.3 1181 (9th Cir. 2002).

c. Nonpoint Source Pollution

In addition to the permitting requirements for point source pollution, the Forest Service is required to meet its own water quality management plan for non-point source pollution. Water Quality Management For Forest System Lands in California Best Management Practices, USDA Forest Service Pacific Southwest Region, September 2000, section 12.42.7.b., at p. 73.

While the Soil and Water Resources Report provides, in Appendices F, G and H, comments on route conditions and needed mitigations, it fails to correlate each of those to the potential for degradation of water quality. Baseline water quality data is not provided or established. The DEIS fails to identify water quality standards and the amount of change acceptable. Nor does it properly establish monitoring methods and frequency, and identify controls and appropriate mitigation. Accordingly, the Forest Service violates provisions under the CWA for control of nonpoint source pollution.

Response

California State and Regional Water Quality Control Board permitting for non-point source pollution is satisfied by Water Quality Management for Forest System Lands in California and the 1981 Management Agency Agreement between the California State Water Resources Control Board and USDA, Forest Service. The Best Management Practice for Water Quality Monitoring of OHV Use (Practice 4-7) is described and applied to this FEIS in section 3.5.2. Information has been added to the “Soil and water quality monitoring” section of chapter 2. This information describes water quality standards, the amount of acceptable change, and baseline water quality for normal conditions.

Comment 47

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wetlands

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The DEIS fails to disclose that the Forest Service is subject to permitting requirements for its OHV trails and roads, as it must comply with requirements of both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. In this way, the DEIS fails to evaluate the environmental effects associated with noncompliance, as required by the National Environmental Policy Act. Should the Forest Service proceed without obtaining required permits, it violates the law. League of Wilderness Defenders v. Forsgren, 309 F.3 1181 (9th Cir. 2002).

Non-Compliance with SNFPA Riparian Conservation Objectives Analysis requirement

The Record of Decision for the Sierra Nevada Forest Plan Amendment Final Supplemental Environmental Statement (USDA Forest Service, 2004) directs the Agency to conduct a Riparian Conservation Objectives analysis for projects occurring within Riparian Conservation Areas (RCAs).

It is not clear if a Riparian Conservation Objectives (RCO) analysis was conducted for this project. Appendix A of the Soil and Water Resource Report outlines a methodology for the RCO analysis and determinations. But there is no actual analysis provided. The public has no way of knowing if the surveys that were done on trails proposed for designation were, in fact compared to the RCO objectives. It appears not, as a number of routes are proposed for designation that clearly violate RCO criteria, including routes in meadows, crossing streams and within riparian areas. A review of that information indicates that none of the action alternatives would meet at least four of the six Objectives identified in the SNFPA.

The RCO objectives that would not be met under any of the proposed alternatives are:

#2: Maintain or restore: (1) the geomorphic and biological characteristics of special aquatic features, including lakes, meadows, bogs, fens, wetlands, vernal pools, springs; (2)streams, including streamflows; and (3) hydrologic connectivity both within and between watersheds to provide for the habitat needs of aquatic-dependent species.
#4: Ensure that management activities, including fuels reduction actions, within RCAs and critical aquatic refuges (CARs) enhance or maintain physical and biological characteristics associated with aquatic- and riparian-dependent species.
#5: Preserve, restore, or enhance special aquatic features, such as meadows, lakes, ponds, bogs, fens, and

wetlands, to provide the ecological conditions and processes needed to recover or enhance the viability of species that rely on these areas.
#6: Identify and implement restoration activities to maintain, restore or enhance water quality and maintain, restore, or enhance habitat for riparian and aquatic species.

The intention of the SNFPA was to preserve and restore aquatic resources by identifying RCAs and CARs and avoiding new damaging projects within them. The proposed action would add trails within Riparian Conservation Areas (RCA's) and Critical Aquatic Refuges (CARs), in violation of the SNFPA.

There are trails proposed for designation that the Watershed specialists recommended against designating. Even assuming the RCO analysis based on the specialists' recommendations met RCO criteria; the failure to follow those recommendations when routes were proposed for designation makes the RCO analysis unreliable. Appendices F, G and H rate unauthorized routes for qualities that affect their suitability for designation as OHV routes. There is no apparent nexus, however, between suitability and a proposal for designation. Indeed, Alternative 2, the proposed project, includes a large number of routes that are rated "high" or "extreme" for impact to soil/water. The DEIS does not disclose the rationale behind proposing the designation of these routes.

Table 1 on page 16 of the DEIS identifies trails added to the National Forest Transportation System under Alternatives 2 through 5. Those needing mitigations before being added to the MVUM have an asterisk. However, Table 1 fails to include asterisks for many trails needing mitigations that are identified by the watershed specialists in the Soil and Water Resource Report, Appendices F, G and H. There is no explanation given for excluding the recommendations made by the Watershed specialists. Until the mitigations identified in the Soil and Water Resource Report by watershed specialists are completed as specified, none of the unauthorized routes should be considered for designation.

Because the RCO analysis does not include NFS roads and trails, the analysis is incomplete. Designating NFS routes for OHV use where there was no prior analysis of the impacts of OHVs is a project and requires RCO analysis.

Response

See sections 3.5.3.1 and 3.5.6.2. Adverse effects for soil and water resources (ratings "High" or "Extreme") in riparian areas were determined when delivery of route-generated sediment to stream channels was observed or when a route was observed to be capturing a stream channel. If the effects could not be mitigated within the scope of this FEIS, the route was rated "Extreme." A revised Riparian Conservation Objectives (RCO) Analysis, presented in Appendix A of the Soil and Water Resource Report, describes how the proposed actions, including the addition of trails to the NFTS, are consistent with the RCOs included in the Record of Decision for the 2004 Sierra Nevada Forest Plan Amendment. Proposed trails rated "Moderate" do not exhibit existing adverse impacts to soil and water resources but have mitigations prescribed to prevent potential future impacts. Only proposed trails with "High" resource ratings have asterisks in Appendix A of the FEIS.

Comment 48

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, pp. 11 and 352.

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

D. Noxious Weeds

Relevant Direction:

The Noxious Weeds Assessment discloses direction relevant to the management and prevention of noxious weeds. These include:

- Forest Service Manual (FSM) 2081.03 requires a weed risk assessment for any ground disturbing activity and noxious weed control measures for any project having moderate to high risk of introducing or spreading noxious weeds;
- Executive Order 13112, which directs Federal agencies to prevent introduction of invasive species, detect and respond rapidly to and control such species, not authorize, fund or carry out actions likely to cause or promote introduction or spread of invasive species unless the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measure to minimize risk of harm will be taken in conjunction with the actions;
- Sierra Nevada Forest Plan Amendment (SNFPA) identifies standards and guidelines applicable to motorized travel management and noxious weeds.

The three goals/priorities include:
1. Prevent the introduction of new invaders.
2. Conduct early treatment of new invaders.
3. Contain and control established infestations.

The DEIS should also have disclosed direction in the Plumas National Forest Land Management Plan, to "control forest pests thru (sic) a site-specific approach (19-a). Select pest management methods based on project level analyses of the relative effectiveness, environmental effects, and costs of the feasible alternatives. For each project, develop and implement a monitoring plan to evaluate predicted project effects and adherence to planned treatment methods."

Response

Mitigation and control measures are addressed on p. 352 of the DEIS.
Monitoring for noxious weeds is addressed on p. 11 of the DEIS.

Comment 49

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The proposed project violates Forest Service Direction and law:

The Noxious Weeds Assessment describes existing knowledge of weed populations based on past surveys, and assesses the risk of spread or introduction of noxious weeds

under the Five (5) Travel Management Alternatives. Having done so, the Plumas Travel Management Plan then proposes to ignore agency direction, NEPA, and the identified risk by proposing to designate routes for motorized travel that it knows will result in the spread of noxious weeds on the forest.

The DEIS discloses field surveys that have been conducted on approximately 287 miles of proposed trails. An additional 66 miles of proposed trail and 10 miles of existing system trails have also been surveyed under past management projects. For those 25 miles of trail that had not been surveyed at the time of the analysis, information from the Plumas noxious weed records were used to analyze the potential risk from known noxious weed infestations. (p. 335)

Information in the DEIS regarding past surveys is vague. The DEIS does not disclose when the surveys were completed, so the public has no way to determine if the information regarding numbers of noxious weed populations is current or outdated. The FEIS should disclose that information; without it, the public cannot fully assess the risk and the Forest Supervisor cannot make a fully informed decision.

The DEIS states motor vehicles "greatly increase" the amount of disturbance along and in the vicinity of the proposed trails. Motor vehicle routes contribute to dispersal of noxious weed species because they (1) create suitable habitat by altering environmental conditions; (2) make invasion more likely by stressing or removing native species; and (3) allow for easier movement by wild or human vectors. (p. 339)

Designation of a trail is expected to increase and concentrate motor vehicle use; this has the potential to increase the risk of noxious weed introduction and spread. (p. 340)

All the action alternatives, except Alternative 3, designate unauthorized routes with a high risk of introducing or spreading noxious weeds. The proposed action, Alternative 2, has the highest risk of spreading noxious weeds, designating trails within 100' of 31 known noxious weed infestations.

Response

The dates of noxious weed surveys will be added to the FEIS. In general, surveys were done between 2002 and 2008.

Comment 50

Action: Mitigation/BMPs

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Mitigations are inadequate

Implementation of Alternatives 2, 4 or 5 would violate the authorities cited at the beginning of this section, as they fail to mitigate the effects of the proposed project on the spread of noxious weeds.

Centaurea solstitialis (Yellow Star Thistle) – The control or eradication of this species requires elimination of seed production as well as depletion of the soil seedbank; on average it takes 5 to 10 years to deplete the seedbank. There are 8 yellow starthistle infestations within 100' of the proposed trails under Alternatives 2, 4 and 5. (p. 342) The DEIS identifies seven trails proposed for designation, all at high risk due to yellow starthistle. Trail 10M39, proposed under Alternative 2, is within 30' of a 1.5 acre infestation, yet no mitigations are proposed for this trail. This violates the SNFPA direction to prevent the introduction of new invaders, conduct early treatment of new invaders and contain and control established infestations.

Trail 10M40, also proposed under Alternative 2, is within 30' of a .8 acre infestation, yet mitigation relies on an undisclosed future project.

Trail 11M25 is within 30' to 100' of a .02 acre infestation. This route is proposed for Alternatives 2, 4 and 5. Mitigation involves hand-pulling individual plants. The DEIS does not disclose if this will be done prior to designation and placement on the MVUM. However, because the seed bank takes 5 to 10 years to deplete, the hand pulling would need to be repeated until no new plants appear for the mitigation to be sufficient. The FEIS should make this requirement for any route designated within the influence of star thistle populations.

Trail 5M06 is with 30' to 100' of a .9 acre infestation. This route is proposed for designation under Alternative 2. Mitigation is hand pulling. However, because the seed bank takes 5 to 10 years to deplete, the hand pulling would need to be repeated until no new plants appear for the mitigation to be effective.

Trail 10M36 is within 0 to 30' of two infestations. This trail is proposed for designation under Alternatives 2 and 5. Mitigation is hand pulling. Because the seed bank takes 5 to 10 years to deplete, the hand pulling would need to be repeated until no new plants appear for the mitigation to be effective. The DEIS makes no provision for annual or repeated hand pulling.

Trail 10M42 is within 0 to 30' of an infestation. This route is proposed for designation under Alternatives 2 and 5. No mitigation is proposed. This violates the SNFPA direction to prevent the introduction of new invaders, conduct early treatment of new invaders and contain and control established infestations.

Trail 6M08 is within 0 to 30' of an infestation. It is proposed for designation under alternatives 2 and 5. Proposed mitigation is hand pulling. Because the seed bank takes 5 to 10 years to deplete, the hand pulling would need to be repeated until no new plants appear for the mitigation to be effective.

Cirsium arvense (Canada thistle) - There are 12 routes proposed for designation under Alternatives 2, 4 and 5 that are within 0 to 100' of infestations. None of these infestations are being treated on an annual basis. One infestation is proposed for treatment under the Keddie Hazardous Fuels project. Four of the infestations are proposed for treatment under future unspecified projects.

According to the DEIS, "to reduce the high risk of spread along these proposed routes, some of these trails will remain closed until future treatments are complete." (p. 344). The DEIS fails to specify which trails will remain closed, a significant omission. Until and unless these infestations are successfully treated, it would be irresponsible for the Forest Supervisor to designate these routes. A decision to open these routes, given the determination of high risk, and the lack of required mitigations, would be arbitrary and capricious.

Cytisus scoparius (Scotch broom) - There are two scotch broom infestations within 100 feet of trails proposed under Alternatives 2, 4 and 5. No mitigations are proposed.

Rubus armeniacus (Himalayan blackberry) - There is one blackberry infestation less than 30' of trail 8M36, a trail proposed under Alternatives 2, 4 and 5. This "poses a high risk of spread from motor vehicles." This species is not actively treated on the Plumas NF and no mitigation is proposed for the trail. It would be arbitrary and capricious to designate this route.

Taeniatherum caput-medusae (medusahead) - There are 7 trails proposed for designation under Alternative 2, 2 trails proposed under Alternative 4 and 3 trails proposed under Alternative 5 within 0 to 100' of medusahead infestations. Four of these trails are within less than 30' of an infestation. According to the DEIS, these trails are all at high risk due to medusahead. (p. 346) The trails are 10M22, 10M20, 10M21, 10M39, 10M38, 10M14 and 10M42. No mitigations are proposed.

According to the DEIS, "implementation of standard management prevention practices is not practical…" (p. 351) The Plumas cannot designate routes it knows will result in the spread of noxious weeds, unless it makes a determination that the benefits of doing so outweigh the risks. Such a determination would surely be challenged.

Response

The future project that would mitigate the star thistle site (CESO3_201) along trail 10M40 is specified in section 3.9.5.2.1 on page 342 of the DEIS; "One infesation, CESO3_201, is proposed for treatment under the Keddie Hazardous Fuels Project."

The DEIS discloses that star thistle site CESO3_292 is required to be hand pulled prior to opening trail 11M25 for public use. See section 3.9.5.2.1 on page 342 of the DEIS .

Route 10M42 is included in Alternative 2; other alternatives do not include this route. The DEIS indentifies Alternative 2 as having the highest risk of infestation and spread of noxious weeds when compared to all action alternatives (section 3.9.6, p. 351).

Trails requiring mitigation prior to authorized use by the public are identified as such in Appendix A of the DEIS.

Rubus armeniacus (Himalayan blackberry) is not currently rated by the California Department of Agriculture (CDFA). The PNF uses the CDFA ratings to assign priorities for treatment and management of weeds because treatment of all known weeds is impractical. The rating system is included on p. 335 of the DEIS. Rubus armeniacus (Himalayan blackberry) is not currently managed by the PNF, as disclosed on p. 345 o f the DEIS.

The DEIS discloses in section 3.9.5.2.5 on p. 346 that there are currently no feasible or effective mitigation measures to control the spread of medusahead. The risk of spread is also disclosed.

The DEIS analyzes the likely effects of implementing the Alternatives. It discloses the risks associated with noxious weed infestation and spread. The PNF does not claim to know the future result of implementation.

Comment 51

Action: Monitoring, Inventories

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, 2.3.1 Monitoring on p. 11.

Monitoring is inadequate

There is no monitoring proposed under any alternative. Given the high risk of designating these trails, any designation must include mitigation, and an implementation and effectiveness-monitoring plan.

Response

"Monitoring would occur along routes added to the NFTS that have been identified as a high risk to sensitive plants or as highly vulnerable to noxious weed spread (see Biological Evaluation and Noxious Weed Risk Assessment in the Porject Record)."

Comment 52

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The proposed project violates Executive Order 11312.

The proposed designation of the routes identified in the Noxious Weed Assessment violates Executive Order 11312, which directs Federal agencies to prevent introduction of invasive species, detect and respond rapidly to and control such species, not authorize, fund or carry out actions likely to cause or promote introduction or spread of invasive species unless the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measure to minimize risk of harm will be taken in conjunction with the actions.

The Noxious Weeds assessment discloses the high risk of further spreading invasive weeds by designating the trails identified in the assessment. The agency has not made public a determination that the benefits of designating OHV trails outweighs the potential harm caused by invasive species. Indeed, such a determination would be indefensible.

Further, the agency has not proposed feasible measures to minimize the risk. Therefore, it would be arbitrary and capricious to designate these trails.

Response

The DEIS identifies prudent and feasible measures to mitigate weed infestation and spread. The DEIS discloses where there are no prudent and feasible measures to mitigate the risk.

Comment 53

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, section 2.3.1, p. 11.

The proposed project violates the Plumas NF Land Management Plan

The Plumas NF LMP requires "For each project, develop and implement a monitoring plan to evaluate predicted project effects and adherence to planned treatment methods." The proposed project includes no monitoring plan and thus violates the LMP standards and guidelines. The FEIS must include a monitoring plan sufficient to detect the spread of the identified and new noxious weeds, and measures to address the spread if additional weeds are detected in monitoring.

Response

Noxious weed monitoring is included in section 2.3.1.

Comment 54

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The proposed project violates FSM 2081.03.

Forest Service Manual (FSM) 2081.03 requires a weed risk assessment for any ground disturbing activity and noxious weed control measures for any project having moderate to high risk of introducing or spreading noxious weeds. The proposed project and all alternatives except Alternative 3 have a high risk of introducing or spreading noxious weeds; however, the DEIS states that "implementation of standard management prevention practices is not practical…" (p. 351) If the Forest cannot devise noxious weed control measures, it may not designate these trails.

Response

The DEIS discloses that standard management prevention practices are not practical. Pages 347 through 351 explanin that mitigations for some of the noxious weed are possible and will be implemented prior to or concurrent with opening the trail to the public. Where mitiagations are impractical the DEIS discloses the risk of noxious weed spread.

Comment 55

Action: Cumulative/Combined Effects

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Cumulative Effects Analysis is inadequate.

Cumulative effects should have considered that some routes are within 100' of multiple noxious weed population types:

10M39 is within 0 to 30' of yellow starthistle, and medusahead.
10M40 is within 0 to 30' of yellow starthistle and Canada thistle.
10M42 is within 0 to 30' of yellow starthistle and medusahead.

The Decision maker must make a determination that the risk of designating these routes is outweighed by the benefits.

By not considering existing NFS routes influenced by noxious weeds, the DEIS fails to adequately consider cumulative impacts of this project on the forest.

Alternative 3 would reduce the threat of noxious weed introduction and spread by banning cross-country travel and not designating any unauthorized routes.

Response

Thank you, your comment has been noted.

Comment 56

Action: Other/Unspecified

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

E. Wild and Scenic Rivers

1. The Plumas National Forest Travel Management Plan should comply with the National Wild and Scenic Rivers Act by closing all motorized roads and trails in the Middle Fork Feather Wild River Zone.

The Plumas National Forest draft Travel Management Plan (TMP) identifies six system roads and trails open to motorized use that enter the Middle Fork Feather Wild River Zone. These roads and trails are:

8M05 – Little California Mine 4WD Trail
8M06 – Stag Point 4WD Trail
8M07 – Deadman Springs 4WD Trail
10M17 – Lost Cabin Springs 4WD Trail
9M28 – Cleghorn Bar 4WD Trail
9M31 – Little Volcano Mine 4WD Trail

Through a process that remains unclear to the public, these motorized roads and trails have apparently been declared part of the forest transportation system and are therefore not considered for closure in the TMP. The motorized roads and trails in the Middle Fork Feather Wild River Zone violate the National Wild and Scenic Rivers Act and USDA/USDI Wild and Scenic River Guidelines. Some of the roads and trails also fail to comply with management direction provided in various agency documents since 1970.

The final TMP should comply with the National Wild and Scenic Rivers Act by closing all motorized roads and trails in the Middle Fork Feather Wild River Zone.

The Law and Federal Guidelines

The Middle Fork Feather Wild and Scenic River was designated by Congress when it passed the National Wild and Scenic Rivers Act (NWSRA), which established the National Wild and Scenic Rivers System in 1968. Congress established the System to protect the free flowing condition and outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values of certain selected rivers (including the Middle Fork Feather) and their immediate environments for the benefit and enjoyment of future generations.

In 1970, the Plumas National Forest (PNF) released the Middle Fork Feather Wild and Scenic River Plan, as required by section 3 (d) (1) of NWSRA. The River Plan established river corridor boundaries and classified certain segments of the Middle Fork as Wild, Scenic, and Recreational. In the River Plan, a 27.5 mile segment of the Middle Fork from its confluence with Nelson Creek downstream to Milsap Bar was designated a Wild River. All the motorized routes identified in the TMP are located in this Wild segment.

Wild Rivers are defined in the NWSRA as:

Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.

The United States Department of Interior and Department of Agriculture (USDI/USDA) adopted federal guidelines for Wild and Scenic Rivers in 1982. In "Section II – The River Study," the guidelines further refined the "generally inaccessible except by trail" criteria for Wild Rivers as:

Classification…Wild river areas will not contain roads, railroads, or other provisions for vehicular travel within the river area. The existence of a few inconspicuous roads leading to the boundary of the river area at the time of the study will not necessarily bar wild river classification. (Pg. 39457, 47 Fed. Reg. 39453 1982)

In "Section III – Management" of the USDI/USDA guidelines, motorized use is addressed this way:

Motorized Travel. Motorized travel on land or water is generally permitted in wild, scenic and recreational river areas, but will be restricted or prohibited where necessary to protect the values for which the river area was designated. (Pg. 39459, 47 Fed. Reg. 39453 1982)

Not only does the management direction in the guidelines conflict with the guidelines' definition of Wild Rivers, it clearly fails to comply with the NWSRA, which is the controlling statute.

Subsequent Planning Documents

Various plans published by the Forest Service over the years, including the 1970 River Plan, the 1988 Plumas National Forest Land and Resource Management Plan, and the 2008 Draft TMP, have failed to comply with the

unambiguous direction of the Act and the federal guidelines by permitting and apparently expanding motorized roads and trails in the Middle Fork Feather Wild River Zone.

In addition to defining the river corridor boundaries and classifying segments, the 1970 River Plan also provided simple management direction for each river zone. The River Plan's Wild River Management Direction specifically states:

No additional public roads will be constructed in the zone and there will be no additional public motorized access to the river. Public vehicular access to the river in this Zone will be limited to the four "vehicular ways" shown on the map of the River Area. (River Plan pg. 6)

The maps referred to in this statement are found on sheet 3 and 4 of the River Plan. The indicated "vehicular ways" include:

1. The Hanson's Bar Trail, which entered the Wild River Zone from the south and reached the river at Hanson's Bar in section 28, T22N, R8E;
2. The Stag Point Trail, which entered the Wild River Zone from the south and reached the river near Stag Point in section 3, T22N, R8E;
3. An unnamed and possibly currently non-existent trail that entered the Wild River Zone from the north and reached the river upstream of Stag Point and downstream of the confluence with Bear Creek in section 34, T23N, R8E;
4. The Cleghorn Bar Trail, which entered the Wild River Zone from the south and reached the river at Cleghorn Bar in section 34, T23N, R9E.

These are the only trails labeled as "vehicular ways" in the River Plan maps. Motorized use of the Hanson's Bar Trail ended when the mine that it serviced at Hanson's Bar was found to be invalid in the 1980s. The trail was subsequently downgraded to non-motorized uses. As for the unnamed trail, it appears on a 1971 PNF Recreation Map as a segment of the former Pacific Crest Trail. It's possible this trail was subsequently closed when the current PCT was rerouted eastward into the Bear Creek drainage to cross the river at Butte Bar. No trail is shown reaching the river in section 34 in subsequent recreation maps, nor is it identified as an existing route in the TMP.

The 1988 PNF Land and Resource Management Plan (LRMP) provided further direction in regard to motorized trails in the Middle Fork Feather Wild River Zone. The LRMP's Wild and Scenic River Prescription (Rx-2) states:

Within the Wild Zone…Permit no additional motorized access routes to the river and no motorized transportation along the river. Permit motorized access on the Cleghorn Bar, Stag Point, Deadman Springs, and Little California Mine roads. (LRMP Pg. 4-69)

Specific management area direction in the LRMP also permitted continued motorized use of the Cleghorn Bar, Stag Point, Deadman Springs, and Little California Mine trails. In addition, specific direction for Management Area 25 (Bear) indicates that motorized use will also be permitted on the Lost Cabin Springs trail, but it is unclear how far into the Wild Zone this motorized use is permitted. (LRMP 4-266)

The planning history shows a pernicious tendency to expand motorized use into the Middle Fork Feather Wild Zone in direct violation of the NWSRA and federal guidelines. Regardless of what has been stated in various plans, the NWSRA is the controlling statute. The TMP is the appropriate venue to rectify this violation by closing the six motorized roads and trails at the Wild River corridor boundary.

Response

There are no proposed routes in the "Wild" portion of the Designated Wild and Scenic River. The only routes being added are in the "Scenic" and "Recreation" portion of the Designated Wild and Scenic River. The 1988 Plumas Land and Resource Management Plan standards and guidelines for Rx-2 Wild and Scenic River Prescription in the "Scenic" are as follows: Construct campgrounds and other developments hwich enhance recreation use. To the extent possible, design and manage recreation developments (including access) to avoid areas of high fire hazard and to prevent ignition and spread of wildfire. Permit overnight use of undeveloped places. Establish and enforce occupancy rules as needed. The "Recreation" portion is as follows: Develop day-use recreation sites near the river according to the Recreation Zone Recreation Managemen Plan (2/15/80). In neither case does it express prohibit route designation, except in the "Wild" portion, which have no routes in the action alternatives.

Comment 57

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Other (SEE RESPONSE)

The PNF TMP must assess the potential impacts of motorized use on the outstanding remarkable values of the Middle Fork Feather Wild and Scenic River and ensure the protection and enhancement of the river's outstandingly remarkable values as required by law.

The Forest Service has the legal obligation to protect and enhance the free flowing character and outstanding values of the Middle Fork Feather Wild and Scenic River. There is no apparent attempt to do so in the TMP.

Section 10(a) of the NWSRA requires that:

Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration, primary emphasis shall be given to protecting its esthetic, scenic, historic, archaeologic (sp), and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development, based on the special attributes of the area.

All agency land and resource management decisions must be filtered through the section 10(a) mandate of the NWSRA. This protection mandate is reiterated in the management section of the USDI/USDA guidelines previously quoted (Pg. 39459, 47 Fed. Reg. 39453 1982).

The administrative record is relatively obscure in regard to the identification of the Middle Fork's specific outstandingly remarkable values. Congress designated the Middle Fork Feather outright when it established the federal system in 1968. Designation occurred without the benefit of an agency study, where the outstandingly remarkable values of a designated river would typically be identified. The 1970 River Plan does not explicitly identify outstandingly remarkable values, although it does provide general references to the primitive nature of the Wild River Zones and the river's "high" populations of "large" rainbow and brown trout.

The Nationwide Rivers Inventory (NRI) published by the National Park Service in 1983 seems to be the first and perhaps only government document to identify the outstandingly remarkable values of the Middle Fork. The NRI confirmed that the Middle Fork possesses the following specific outstandingly remarkable values:

Scenic: This segment of the Middle Fork Feather River flows through the spectacular Middle Fork Canyon past large boulders, cascades, huge granite outcroppings, and an outstanding waterfall. In several places, the gorge rises one-half mile straight up from the gravel banks of the river and is most scenic in Bald Rock Canyon. Feather Falls on a tributary to the lower reach has a drop of 640 feet – the third highest in the nation.

Recreation: Activities include fishing, swimming, camping, and hiking. With limited access, the primary recreational value is the enjoyment of the wilderness experience in a highly scenic setting.

Fishery: The Middle Fork Feather River possesses one of the most outstanding wild trout fisheries in California. There are abundant pools and riffles that create an excellent habitat. Native wild rainbow trout are the most abundant species of trout. Brown trout are also present and often reach a large size. This may be partially due to the up-migration from Oroville Reservoir. Non-game species include squawfish, suckers, and carp. (1981 NRI, NPS)

To comply with Section 10(a) of the NWSRA, the TMP must assess the potential impacts of retaining motorized travel routes in the Middle Fork's Wild Zone on the river's outstandingly remarkable scenic, recreation (particularly the "wilderness experience in a highly scenic setting"), and fishery values. The final TMP is required by law to protect and enhance these values. Based on this assessment, a revised TMP should manage, limit, or prohibit motorized use accordingly.

Response

There are no proposed routes in the "Wild" portion of the Designated Wild and Scenic River. The only routes being added are in the "Scenic" and "Recreation" portion of the Designated Wild and Scenic River. The 1988 Plumas Land and Resource Management Plan standards and guidelines for Rx-2 Wild and Scenic River Prescription in the "Scenic" are as follows: Construct campgrounds and other developments which enhance recreation use. To the extent possible, design and manage recreation developments (including access) to avoid areas of high fire hazard and to prevent ignition and spread of wildfire. Permit overnight use of undeveloped places. Establish and enforce occupancy rules as needed. The "Recreation" portion is as follows: Develop day-use recreation sites near the river according to the Recreation Zone Recreation Managemen Plan (2/15/80). In neither case does it express prohibit route designation, except in the "Wild" portion, which have no routes in the action alternatives.

The Travel Management Rule is comprised of three parts:Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach each large vegetation management project with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 58

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Other (SEE RESPONSE)

The PNF TMP must assess the potential impacts of motorized use on rivers and streams identified by the PNF in 1994 as eligible Wild and Scenic Rivers. The TMP must maintain potential classifications and protect the outstandingly remarkable values of the eligible rivers and streams.

To comply with an LRMP appeal settlement agreement , the PNF in 1994 identified a list of rivers and streams on the PNF that the agency believed to be eligible for Wild and Scenic River status. Referred to as Appendix S, the list identified 28 eligible rivers and streams throughout the forest and identified outstandingly remarkable values and proposed classifications for each eligible segment. Along with the list of eligible rivers, the PNF released a proposed plan amendment that provided the following forest-wide standards and guidelines:

Apply protection measures to eligible rivers and streams listed in the Appendix S until a decision is made regarding the future use of the rivers and streams and adjacent lands.

Utilize Rx-18 – Eligible Wild and Scenic River Prescription.
Implement protections (sic) measures for (sic) covering the length of the river segments and one quarter mile in width from each bank of the river, excluding private and non-National Forest System lands.

Protect, and to the extent practicable, enhance the outstandingly remarkable values of the identified river area.

Prohibit modification of the management and development of the identified river and streams and their corridors to the degree that eligibility or classification would be affected (i.e., classification cannot be changed from wild to scenic to recreational).

Rx-18, the Eligible Wild and Scenic River Prescription provided as an attachment to the list of eligible rivers, outlined the following activity-specific standards and guidelines for eligible rivers classified as Wild:

f. Road Construction – Prohibit roads or other provisions for overland motorized travel within a narrow incised river valley or, if the river valley is broad, within ¼ mile of the river bank. Do not disqualify wild river classification based on a few inconspicuous roads leading to the boundary of the river area at the time of study. Allow unobtrusive trail bridges.

k. Motorized travel – May permit motorized travel on land or water, but is generally not compatible with this classification.

The Forest Service Handbook (FSH 1909.12-2006-8) provides similar direction for the interim protection eligible rivers. Specifically:

4. Transportation System.

a. Wild. New roads are not generally compatible with this classification. A few existing roads leading to the boundary of the river corridor may be acceptable. New trail construction should generally be designed for nonmotorized uses. However, limited motorized uses that are compatible with identified values and unobtrusive trail bridges may be allowed. New airfields may not be developed. (FSH 1909.12_80, pg. 24)

Although this interim protection guideline allows for limited motorized use, such use must be compatible with identified values and more specifically, must ensure protection of classification and outstandingly remarkable values of eligible rivers. There is no evidence in the TMP that the necessary assessment was made to determine if motorized uses were compatible and protective of eligible river classifications and values as required by the FSH.

As a practical matter, it is difficult for the public to determine potential impacts on eligible streams because the TMP map does not include a comprehensive stream layer. Because many eligible streams are not marked on the map, it is difficult if not impossible to determine where motor vehicle routes intersect with eligible streams.

A revised TMP should assess the potential impacts of motorized use on eligible rivers and streams and ensure the maintenance of potential classifications and protection the outstandingly remarkable values of all eligible streams as required by the FSH and PNF planning documents.

Response

The commenter is referring to direction related to eligible Wild river segments. No trails will be added to the system in eligible Wild river segments.

Motorized trails are allowed in eligible Scenic and Recreational segments.

Comment 59

Action: Cumulative/Combined Effects

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

F. Mule Deer

The DEIS cites a well-accepted habitat effectiveness model that determined mule deer habitat effectiveness declined by 50-95% at road densities of 6 miles/section (p. 228). Because the Plumas NF fails to consider existing roads in its modeling, the DEIS analysis of the direct and cumulative effects of its Travel Management alternatives on mule deer is meaningless and useless.

The analysis of impacts to mule deer from the Travel Management Plan is based on a comparison of "open unauthorized routes," "existing" and "proposed trail densities" in the five alternatives. It attempts to compare alternatives by comparing densities of existing and proposed trails, but those comparisons, on their own, are meaningless. Without knowing the total traffic density, it is not possible to assess the impact on deer habitat. Even the cumulative impacts analysis omits this essential data. NEPA's interest isn't in comparing alternatives for the sake of comparing alternatives; the point is to disclose impacts of each alternative and then make an informed choice from among them. The information provided in this DEIS is insufficient for either the public or the decision-maker to make that informed choice.

The DEIS recognizes the importance of restricting motorized vehicle access within certain deer habitat areas (p.230). It is not clear what the Diamond Mountain Closure's intent is. The closure is during deer season, so it is apparently not for fawning or winter range. The DEIS recognizes the importance of key summer fawning and critical winter ranges, but does not appear to require seasonal closures to protect fawning or wintering deer. Given the steep decline in mule deer numbers in the region over recent years, maximum protection should be provided for mule deer habitat, especially critical winter and fawning areas.

Cumulative effects
According to a joint study involving the Forest Service, California Department of Fish and Game and the Bureau of land Management, which looked at declining mule deer populations throughout California, Deer Unit 3 (DU 3), including the Plumas National Forest, suffered the state's second largest decline, from 40,000 in 1992 to 10,000 in 1996. The EIS must disclose this fact and an analysis of the reasons behind this decline. It must also disclose what the Forest is doing and/or plans to do to mitigate these huge losses.

The DEIS does not include a discussion of the cumulative impacts from herbicide treatments, or the effects of invasive noxious weeds. Both of these are common in Sierra Forests and are likely contributing to the impacts on mule deer habitat on the Plumas NF.

Noxious weeds are spread by vehicles and further contribute to the loss of deer habitat. The cumulative impacts analysis must include a discussion of how all the individual impacts contribute to the decline in deer habitat and numbers, which of these impacts can be avoided and/or mitigated.

Response

Existing Roads and road densities have been factored into the Cumulative effects section for Mule Deer (see FEIS, Table 98, page 268).

The mention of the Diamond Mountain Closure in the FEIS is too simply state that it will continue under all the action alternatives. (See FEIS, page 259). The text of the FEIS clearly states that the reason for the closure was due to the high volume of vehicles in the Diamond Mountain area during deer season.

Deer Unit 3 (known as DAU 3 by the Plumas NF) was changed by the California Department of Fish & Game to DAU 10 in 2003. Based on CDFG, 2003 data, most notably eastside deer populations (DAU 9, 10) occupying great basin habitats experienced significant declines during 1990-1996. However these populations have appeared to have stabilized based on recent trend estimates (CDFG, 2003).

The Plumas NF does recognize the importance of fawning habitat and critical winter range and seasonal closures, not to mention dropping routes from alternatives. The following routes were dropped from consideration in critical winter range; 10M20B, 10M21C, 10M35 and 10M36A, from winter range; 9M59A, 9M59C, 9M59D, and 9M59E, and from summer range; 10M33. Other routes within deer ranges will have seasonal closures (e.g. seasons of use) implemented in order to minimize disturbance to deer during seasonal use periods (see Appendix A).

The Plumas NF is currently implementing herbicide treatments for Noxious Weeds on a very limited scale (up to 20 acres). This amount of herbicide treatement does not pose an impact to deer on an individual or deer herd level. Although the Plumas NF has noxious weed occurrences on the Forest, those occurrences are relatively small and do not pose a threat to deer habitat nor are there noxious weed occurrences on the Plumas NF contributing to declines in deer numbers at this time. Based on prescriptions from the Mule Deer Working Group (Hayden et al 2008) for weed occurrences at low infestation levels, such as those on the Plumas NF, the Plumas Travel Management Project actions, such as monitoring and treatment, are consistent with those of the working group.

Comment 60

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS Chapter 3, Terrestrial and Aquatic Species

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

H. Old Forest Habitat and Species

The Plumas NF is covered under the Sierra Nevada Forest Plan Amendment, which includes an objective to protect, increase and perpetuate old forest ecosystems and provide for the viability of native plant and animal species associated with old forest ecosystems. Species associated with old forest ecosystems include: California spotted owl, Northern Goshawk, American marten, Pacific fisher, Sierra Nevada red fox, wolverine, and a number of migratory bird species, all of which are found in the Plumas National Forest.

As noted throughout the DEIS, roads and trails fragment habitat. Andren (1994) suggested that as landscapes become fragmented, the combination of increasing isolation and decreasing patch size of suitable habitat is negatively synergistic, compounding the effects of simple habitat loss. In particular, species associated with old forest habitats may be impacted by such effects."

"Old Forest Emphasis Areas" (OFEAs) are to be managed for the purpose of maintaining or developing old forest habitat in areas containing the best remnant blocks or landscape concentrations of old forests and in areas that provide old forest functions, such as connectivity of habitat. Roads and OHV trails decrease interior forest patch size, decreasing the amount of habitat and increasing the distance between suitable interior forest patches for old forest species.

The SNFPA Record of Decision states, "The old forest and associated species conservation strategy in this decision aims to provide environmental conditions that are likely to maintain viable populations of old forest associated species, most specifically the California spotted owl, well-distributed across Sierra Nevada national forests. Further, SNFPA states, "The landscape strategy accomplishes this goal at multiple spatial scales by: (1) protecting and managing old forest emphasis areas to provide high quality California spotted owl habitat....(4) protecting all patches larger than 1 acre of high quality old forest characterized by large trees and high canopy closure.

The existing and proposed routes in old forest areas hinder, rather than further the goal of maintaining high quality habitat for old forest associated species.

As stated above, merely attempting to assess the potential impacts may or may not meet the legal bar for NEPA compliance, but it does not meet the higher standard of protection required under the Executive Orders and Travel Management Rule. These require that the project give deference to the needs of wildlife over the desires of motorized recreationists.

Some species, such as marten, are especially sensitive to fragmentation; and "may experience exponential population declines at relatively low levels of fragmentation." (Bisonette et al, 1997, in USDA FS 2004). In order to maintain or develop old forest habitat, road and trail density must be minimized. Designation of OHV routes in OFEAs violates the objectives for which they were designated.

Routes should not be designated in CSO or goshawk activity centers. These species would benefit from the effort to maintain and develop old forest emphasis areas.

Likewise, many forest bird species are sensitive to habitat fragmentation and human intrusion. They are impacted by roads and trails that fragment old forest habitat, decreasing the amount of interior forest habitat and increasing edge effect.

Response

Effects to Old Forest Emphasis Areas are addressed in Section 3.7.9.7 of the FEIS. Effects to OFEAs will occur under all action alternatives, but will be significantly reduced under alternatives 2-5, when compared to Alternative 1 (no action). Under the 2004 SNFPA, there is no direction prohibiting OHV routes in OFEAs. In addition, the commenter reference to SNFPA in regards to "protecting all patches larger than 1 acre of high quality old forest characterized by large trees and high canopy closure" comes from the 2001 SNFPA and not the 2004 SNFPA.

Effects to Spotted Owl and Goshawk PAC were evaluated in the FEIS and can be found in Sections 3.7.10 and Sections 3.7.12 respectively. The SNFPA does not prohibit motorized routes in PACs, but does provide guidance on Limited Operating Periods for activities that may affect nesting pairs. One criteria used for route analysis on effects to nesting pairs, if a route went through a PAC, was to analyze for distance to the nest or roost site or its topographic position in relation to the nest or roost site. For example, many routes went through PACs, but impacts were considered minor if the route passed through the edge or a small portion of the PAC or if distance, topography or vegetation screened and minimized effects such as noise or visibility.

Effects to wide ranging carnivores were evaluated in the FEIS and can be found in Sections 3.7.7 and 3.7.14. In regards to Marten, the Zielinski et al 2008 study on Martens and OHV found that "the level of OHV use we witnessed did not affect occupancy and, therefore, did not appear to be contributing to fragmentation." The Plumas NF agrees with Zielinski that the motorized routes addressed in the FEIS will not result in habitat fragmentation due to the width of the routes and the low amount of use currently occurring on the PNF. Fragmentation of habitat occurs more often with higher level road categories, such as paved roads and highways were widths are greater and vehicle speeds are faster.

Forest bird species are addressed in the Management Indicator Species section of the FEIS. Habitat fragmentation for birds will be very limited by the action alternatives (2-5), since the route widths being considered are relatively small.

Comment 61

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Consultation with the U.S. Fish and Wildlife Service under the Endangered Species Act over the Effects of the Proposed Action

The Forest should consult with the FWS over the effects of it chosen alternative pursuant to the ESA, 16 U.S.C. [section] 1531 et seq., if any alternative besides Alternative 3, modified, is chosen. The DEIS identifies impacts to several listed species from continued ORV use on the Forest, and so consultation with the FWS is necessary to avoid extinction of species or adverse modification of critical habitat. This cannot be avoided simply because a chosen alternative may have fewer impacts than the status quo.

Response

The Plumas NF has consulted the U.S. Fish & Wildlife Service under Section 7 of the 1973 Endangered Species Act, as amended. Mandatory Terms and Conditions issued by the Fish & Wildlife Service in their Biological Opinion have been incorporated into the FEIS.

Comment 62

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Air Quality and Noise

Disposition: Resolved: Comment acknowledged; does not provide new information

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

I. Impacts from Noise

The Draft Environmental Impact Statement for the Plumas National Forest inadequately considers the potential impacts of the propagation of engine noise around roads and recreational trails in either its route-specific assessment or its analysis of cumulative impacts of the motorized system. Many spatial models and software packages are available for analyzing potential noise propagation from transportation systems, including a GIS model that our office (TWS) recently developed for the specific purpose of analyzing noise propagation from off-road vehicles in forest landscapes.

The model we developed is based on the System for the Prediction of Acoustic Detectability (SPreAD), a workbook issued by the Forest Service and Environmental Protection Agency for land managers to "evaluate potential … acoustic impacts when planning the multiple uses of an area." We adapted the SPreAD model to a GIS environment so that potential noise impacts could be integrated with other variables being considered in the travel management planning process. We have included the user's guide for the SPreAD-GIS model as an appendix to this document (Appendix C), and we would be happy to provide an up-to-date version of the software at your request. The SPreAD-GIS model can be implemented in your existing ArcGIS software at no additional cost.

Response

As stated in the Travel Management Rule as part of the evaluation criteria for designating roads and trails where motor vehicle use will be allowed, the Forest Supervisor must consider the effects of route designations on conflicts among uses of NFS lands. The Recreation section in Chapter 3 of the FEIS discusses the possible conflicts among uses that would result from implementing each of the alternatives including noise.

Comment 63

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Cultural Resources

Disposition: Resolved: Other (SEE RESPONSE)

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

J. Cultural Resources

Section 106 of the National Historic Preservation Act (NHPA) requires the Forests to protect historic sites from harm caused by transportation impacts. It requires the USFS to actively inventory and evaluate cultural resources within the Plumas National Forest and to "take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register" and "afford the Advisory Council on Historic Preservation...a reasonable opportunity to comment with regard to such undertaking." (emphasis added).

The Advisory Council on Historic Preservation (the entity charged with interpreting the NHPA) states that the:

Area of Potential Effect (APE) for the road, trail, or area shall include corridors or zones adjacent to the road, trail, or area that the Forest determines to be subject to direct or indirect effects due to local environmental factors or the proximity of particularly sensitive resources. This will include the road, trail, or area surfaces, passing or parking areas, and campsites or other features established as part of the road or trail. It shall also include additional affected areas or properties if the designation would facilitate increased access to those historic properties.

Under the NHPA, Forests shall also be responsible for identifying consulting parties and inviting them to participate in the decision-making process. The consulting parties shall include, as appropriate, State Historic Preservation Officers (SHPOs), Tribal Historic Preservation Officers (THPOs), and other federally recognized Tribal governments.

The Motorized Recreation Programmatic Agreement (PA) among the Pacific Southwest Region, California State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation for Designating Motor Vehicle Routes and Managing Motorized Recreation on the National Forests in California provides procedures for complying with 36 CFR [section] 800. The PA includes a Heritage Resource Strategy outlining the requirements for cultural resource inventory, evaluation of historic properties, and effect determinations. The Heritage Resource Strategy states the following:

For the purposes of this strategy, all cultural resources within APEs are considered historic properties, even if they have not been formally evaluated using National Register of Historic Places (NRHP) Criteria (36 CFR [section] 60.4), unless they already have been determined not eligible in consultation with the SHPO or through other agreed on procedures (36 CFR [section] 60.4; 36 CFR [section] 800; CARIDAP, etc.). If designation of routes may diminish historic property prospective NRHP values, Forests shall follow the provisions of 36 CFR [section] 800 regarding evaluation and determination of effects….

The Executive Order on Use of Off-Road Vehicles establishes that ORV use may occur only in areas where its use has been determined to minimize conflicts with other users, promote safety, and protect resources. ORVs are to be "controlled and directed" to specific areas. It is clear under this standard that few areas and trails are to be open to ORVs due to the resource damage and user conflicts they cause.

Executive Order 11644 and the Travel Management regulations set clear and unambiguous criteria that must be considered before designating any road/trail open to motorized travel. These criteria are necessary to ensure that motorized designations are informed by thorough consideration of the impacts to cultural resources and other uses of National Forests. Despite these clear mandates, the Forest Service has misconstrued its obligations to apply the minimization criteria at a site-specific level during the route designation process and is proposing to designate roads through 227 archaeological sites resulting in negative effects to the heritage resources on those sites.

Response

As discussed in the DEIS (Section3.10.1), programmatic agreements commonly provide alternative procedures for complying with NHPA, and these agreements are designed to compliment NEPA analysis. In this case, the reference "Motorized Recreation PA" was used to define the Area of Potential Affect (APE) (36 CFR 800.4(a)(1)), in this case a 30 meter corridor centered on proposed routes. Effects determinations and the proposed protection measures were also based on the process identified in the PA.

A wide-range of interested parties were consulted regarding the undertaking, including Tribes whose ancestral territory includes the Plumas National Forest (refer to Section 1.6.1)

As mentioned in the comment, 227 archaeological sites were identified within the project area. It should be noted that the presence of these sites alone within or adjacent to proposed routes does not constitute an adverse effect to the resource. Designation of routes must diminish prospective National Register of Historic Places criteria. As discussed in Section 3.10.5.1 of the DEIS, the following NRHP are applicable to this project: criterion (c) which includes resources that embody distinctive characteristics of a type, period, or method of construction, that represent the work of a master, and that possess high artistic values, that represent a significant and distinguishable entity whose components may lack individual distinction (e.g. historic structures); and criterion (d) which includes resources that have yielded, or may be likely to yield, information important in prehistory or history (e.g. prehistoric and historic archaeological sites) (36 CFR60.4(a-d)). Integrity measures are based on effects to important site characteristics, including location, design, setting, materials, workmanship, feeling and/or association (36 CFR 800.5(a) (1)). For the vast majority of sites within the APE, effects to these characteristics were absent or negligible. For resources where potential effects were identified, protection measures will be implemented to ensure retention of these values as discussed in Table 155.

Site-specific analysis was completed and the effects of the project to cultural resources were carefully considered in accordance with all applicable laws and regulations, including those referenced in the above comment, and in the cultural resources section of the DEIS (Section 3.10.1).

Comment 64

Action: Goals and Objectives/LRMP Consistency

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

K. Semi-primitive Non-motorized Areas

The Plumas Forest Land and Resource Management Plan (LRMP) states that the Semi-Primitive Non-Motorized (SPNM) prescription "applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation." The LRMP Standards and Guidelines include the following:

Provide opportunities for activities such as hiking and walking, horseback riding, viewing scenery, camping, hunting, nature study, mountain climbing, swimming, fishing, cross-country skiing, and snowshoeing. Provide both hiking and horseback riding routes in and to the areas. Allow no motorized travel except over-the-snow and management access.

The Plumas DEIS ignores this prescription (Alternatives 2 and 5) and proposes to designate approximately 16 National Forest Transportation System maintenance level 2 roads within SPNM areas (see Appendices D and E)

Designating motorized use in Semi-Primitive Non-Motorized areas violates the Forest Standards and Guidelines of the LRMP which prohibits motorized travel (except over-the-snow) and recommends that these areas be managed for quiet forms of recreation (e.g., hiking, fishing and camping).

Response

There are no proposed trail additions in Semi Primitive Non Motoirzed Areas.

Comment 65

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Other (SEE RESPONSE)

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

L. Inventoried Roadless Areas

We [The Wilderness Society, et. al.] contend that agency inventoried roadless areas (AIR) and citizen-inventoried roadless areas (CIR) generally should not contain designated OHV routes. The responsible National Forest officials are required to "minimize conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands." By definition, roadless areas afford a type of quiet and primitive recreation that cannot be found near roads. To allow OHV use in these areas would cause disproportionate conflict between quiet recreationists and OHV users and will risk precluding roadless areas from further consideration for Wilderness designation. By designating at least 10 National Forest Transportation System (NFTS) roads in agency inventoried roadless areas, 20 NFTS roads in citizen-inventoried roadless areas, and 35 new unauthorized roads in citizen-inventoried areas, reasonable access for experiencing wildness will be denied to those forest visitors who engage in quiet forms of recreation (see Appendices D and E for route numbers).

Furthermore, the Executive Order on Invasive Species states that all federal agencies will use relevant programs and authorities to prevent the introduction of invasive species, and "not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species…unless… the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm." Given that roads and OHVs serve as corridors for exotic plant and disease invasion, and that invasion by exotic species is one of the four threats to the health of the National Forests identified by the former Forest Service Chief, we believe that roadless areas should serve as refuges from motorized encroachment.

Response

The selected alternative will not have proposed trails added to the NFTS that occur in the Inventoried Roadless Areas. Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas.

There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, alternative 3 adds no proposed trails to the NFTS.

Comment 66

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Climate

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

M. Climate Change

The Plumas DEIS violates NEPA in several respects by failing to analyze the impacts of climate change. See Appendix B.

Response

The action is focused on managing where motor vehicles travel. This action does not regulate or increase the number of vehicles on NFS lands. The regulation of emissions is not within the jurisdiction of this agency. The Forest Service acknowledges that climate change has the potential to affect resources on the Forest.

Comment 67

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The preferred action Alternative, if chosen, would be in violation of numerous laws and regulations and be in conflict with the Plumas Land and Resource Management Plan.

N. Route-specific Comments (System Routes)

In Appendix D, we [The Wilderness Society, et. al.] have identified numerous resource conflicts with the putative system routes that the Forest has included in their maps depicting the various Alternatives. The following Plumas NF existing system roads should be closed to motor vehicle use at all times of the year and eventually restored to a more natural condition. We examined all of the maintenance level 2 system roads in the proposal area and used G.I.S. spatial data obtained from USFS Region 5, Plumas National Forest, and the California Natural Diversity Database to identify which roads conflict with areas that we believe are incompatible with motorized use: Wilderness Areas, Primitive and Semi-primitive Non-motorized Areas, Research Natural Areas, Special Interest Areas, federally Endangered and Threatened Species critical habitat, agency-inventoried roadless areas, citizen-inventoried roadless areas, and montane meadows (see Table 1). Any maintenance level 2 system road or motorized trail that travels through these areas is recommended for closure. An Excel file is attached.

Response

Maintenance Level 2 system roads are part of the NFTS. The NFTS is not being analyzed with this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 68

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

O. Route-specific Comments (Unauthorized Route Additions)

In Appendix E, we [The Wilderness Society, et. al.] have identified numerous resource conflicts with the unauthorized route additions from the Plumas National Forest proposed action. These routes are those that we identified in scoping as having the greatest amount of natural resource problems; they should not be designated for motor vehicle use. Increased scrutiny and precaution should be used before adding new routes to the system; therefore we used the same filters as in Appendix D (using G.I.S. spatial data obtained from USFS Region 5, Plumas National Forest, and the California Natural Diversity Database), but also considered the proposed routes' effects on plants and animals listed in Region Five's sensitive species list by Forest and those species listed as threatened or endangered by the U.S. government or the state of California (see Table 1). Any unauthorized route proposal that travels through critical habitat for these plant and animal species, passes through a critical aquatic refuge, or does not meet the criteria set out in Appendix D is recommended to be not designated. This does not imply an endorsement of other route additions in the proposed action. In fact, we do not condone the addition of any new unauthorized routes in the absence of travel analysis, identification of the minimum transportation system, and identification of unneeded routes. An Excel file is attached.

We are concerned that there is no methodology in the DEIS which explains how routes were chosen to be added to the transportation system. We are especially concerned that only a very small percentage of the unauthorized routes were even visited by Forest Service staff to determine potential impacts on botanical resources, recreation, heritage resources, aquatic species, wildlife, hydrology, and soils. It is unclear from the DEIS which routes were actually visited by USFS staff.

Table 1. The following table explains the methods used for arriving at these recommendations:

Area or Resource of Concern

Wilderness
Administratively Endorsed Wilderness
Primitive and Semi-primitive Non-motorized areas
Research Natural Areas
Endangered Species Critical Habitat
Wild River Corridor
Agency-inventoried Roadless Areas
Citizen-inventoried Roadless Areas
Pacific Crest Trail
Special Interest Areas
Cultural Sites
Scenic River
Recreational River
Montane Meadows
Meadow Management Zones
State Threatened or Endangered Species
Forest Service Sensitive Species
Critical Aquatic Refuge
Riparian Conservation Areas

System Roads

Decommission
Decommission
Decommission
Decommission
Decommission
Decommission
Decommission (with rare exceptions)
Decommission non-essential roads
Decommission non-essential roads
Decommission non-essential roads
Decommission non-essential roads
Decommission non-essential roads
Decommission non-essential roads
Decommission non-essential roads
Decommission non-essential roads
Keep open but monitor
Keep open but monitor
Keep open but monitor
Keep open but monitor

System Motorized Trails

Close to motor vehicles
Close to motor vehicles

Close to motor vehicles
Close to motor vehicles
Close to motor vehicles
Close to motor vehicles
Close to motor vehicles (with rare exceptions)
Close to motor vehicles (with rare exceptions)
Close to motor vehicles
Close to motor vehicles
Close to motor vehicles
Close to motor vehicles
Close to motor vehicles
Close to motor vehicles
Close to motor vehicles
Keep open but monitor
Keep open but monitor
Keep open but monitor
Keep open but monitor

Unauthorized Route Proposals

Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Do not designate
Designate if no damage is occurring

Response

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1).

Alternative 3 responds to non-motorized recreation interest in “Citizen Inventoried Roadless Areas (CIRAs)” proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 69

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: List of Routes respondent says should not appear on motor vehicle maps

Comment 70

Action: See Attachment

Resource(s): Climate

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2]: Information on climate change.

Response

The action is focused on managing where motor vehicles travel. This action does not regulate or increase the number of vehicles on NFS lands. The regulation of emissions is not within the jurisdiction of this agency. The Forest Service acknowledges that climate change has the potential to affect resources on the Forest.

Comment 71

Action: See Attachment

Resource(s): Air Quality and Noise

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 3]: Appendix C: SPreAD-GIS: an ArcGIS toolbox for modeling the propagation of engine noise in a wildland setting.

Date: December 19, 2008

Authors: Sarah E. Reed, Ph.D. Landscape Ecologist - Jacob P. Mann, GIS Consultant - Jennifer L. Boggs, Associate GIS Analyst.

Comment 72

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix D System Routes

Route Type: Motorized Trail - Route ID: 8M07 - Route Conflict(s): Agency Inventoried roadless area - Ranger District: Mount Hough

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, alternative 3 adds no proposed trails to the NFTS.

Comment 73

Action: Beckwourth District

Resource(s): Wetlands, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix D System Routes

Route Type: Motorized Trail – Route ID: 10M08 - Route Conflict(s):Montane Meadow - Ranger District: Beckwourth

Comment 74

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix D System Routes

Route Type: Motorized Trail – Route ID: 8M05 - Route Conflict(s): Semi-primitive non-motorized area, Proposed or Existing Wild and Scenic River corridor - Ranger District: Feather River

Response

Existing system motorized trail.

Comment 75

Action: Feather River District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix D System Routes

Route Types: Motorized Trails – Route IDs: 10M05/10M05A - Route Conflict(s): Proposed or Existing Wild and Scenic River corridor - Ranger District: Feather River

Comment 76

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix D System Routes

Route Type: Motorized Trails – Route ID: 8M06 - Route Conflict(s): Proposed or Existing Wild and Scenic River corridor/Semi-primitive non-motorized area/Citizen-Inventoried roadless area - Ranger District: Feather River

Comment 77

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M18A - Route Conflict(s): Agency-inventoried roadless area - Ranger District: Mount Hough

Response

The selected alternative will not add any routes in the Inventoried Roadless Area.

Comment 78

Action: Feather River District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10E05 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 10M03 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 10M04 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Comment 79

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M11 - Route Conflict(s): Agency-inventoried roadless area, Citizen-inventoried roadless area, California Spotted Owl - Ranger District: Feather River

Response

Route 10M11 was dropped from Alternative 4 and any portions enterring the Inventoried Roadless Area will be dropped from the decision.

Comment 80

Action: Beckwourth District

Resource(s): Vegetation (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 13M08 - Route Conflict(s): Astragulus lentiformis - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M09 - Route Conflict(s): Astragulus lentiformis - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M09 - Route Conflict(s): Astragulus lentiformis - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 14M05 - Route Conflict(s): Astragulus lentiformis - Ranger District: Beckwourth

Response

These routes are included in the analysis of effects to Astragalus lentiformis and in Table 129 on p. 312 of the DEIS.

Comment 81

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 6M25 - Route Conflict(s): American marten - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M26 - Route Conflict(s): American marten - Ranger District: Feather River

Response

Appendix E in the DEIS includes watershed maps to delineate the watershed analysis areas for the three ranger districts on the Plumas NF.

Route 6M25 and 6M26 were dropped from Alternatives 3-5.

In regards to Route 6M25 and 6M26 – these routes were ranked low for the Marten due to the fact that marten do not occur within this portion of the forest, the routes are not within the Draft Carnivore Network, and effects to habitat are considered low.

Comment 82

Action: Feather River District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M06 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Response

10M06 Route was not analyzed in this project.

Comment 83

Action: Beckwourth District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M03 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 11M04 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 12M01A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Beckwourth

Response

Trail 12M01A has been dropped and is no longer included in the action alternatives. Trails 11M03 and 11M04 do occur within the Lakes Basin CAR, however this alone does not pose a conflict to aquatic resources. Impacts to aquatic species such as the Mountain Yellow-legged Frog (MYLF) have been determined to be low (see Appendix A) for these two routes since the nearest known occurrence of MYLF is over 2 miles away.

Comment 84

Action: Mount Hough District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M21 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M22 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M23 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M25 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M26 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M27 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Response

Route 12M21, 12M22, 12M23 all occur within the Lone Rock CAR. Impacts to aquatic species such as the Mountain Yellow-legged Frog (MYLF) have been determined to be low or moderate(see Appendix A) for these three routes. No known occurrence occur within the vicinity of these routes. Routes 12M25, 12M26 and 12M27 all occur within the Boulder-Lowe CAR. These routes do not pose a conflict to MYLF and have been deteremined to pose low or moderate effects.

Comment 85

Action: Beckwourth District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 13M25 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M26 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M27 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Beckwourth

Response

Routes 13M25 and 13M26 occur within the Boulder-Lowe CAR. Route 13M25 has been designed with a Season of Use to miminize effects to the MYLF under Alternatives 2 and 5. Route 13M26 under Alternatives 2, 4 and 5 pose low effects to the MYLF (see Appendix A). Route 13M27 was dropped from Alternatives 4 and 5 and was non-existent on the landscape when surveyed.

Comment 86

Action: Feather River District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 5M08 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M09 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M10 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M03 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M04 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M08 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River
Route Type: Unauthorized - Route ID: 6M09 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M10 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M12 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M13 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M14 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M14A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M15 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M16A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M16B - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 7M12 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Response

Dropped in Alternative 3 and 4.

Comment 87

Action: Mount Hough District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 7M13 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 7M14 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 8M10 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 8M11A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 8M16 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 8M17 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 8M23 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Response

Routes 7M13, 7M14, 8M10, 8M16 and 8M23 all occur within the Bucks CAR. Routes 7M13 and 8M23 under alternative

2 were designed with a Season of Use in order to minimize effects to the MYLF. Routes 7M13 and 8M23 were not included in alternatives 4 & 5. Routes 7M14, 8M10 and 8M16 pose moderate effects to MYLF (see Appendix A). No Season of Use for MYLF were applied to these last three routes.

Route 8M11A occurs within the Rock CAR. Route 8M11A poses only moderate effects to MYLF.

Route 8M17 does not occur with in a CAR, therefore no conflicts exist. However, a season of use is applied to this route since a MYLF occurrence is known within 500 feet of the route. The season of use is applied to minimize impacts to the MYLF (see Appendix A).

Comment 88

Action: Feather River District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M02 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M03 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M04 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M08 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M08A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M10 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M11 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M12 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M13 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M14 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M14A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M15 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M16 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M16A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M17 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M19 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 15M05 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Response

All routes occur within the Pine Grove CAR. However, the occurrence of a route within a CAR does not alone indicate a conflict with aquatic species. Appendix A indicates the degree of impacts to aquatic species by route, however,

each route is addressed and summarized below:

Routes 9M02, 9M08, 9M08A, 9M10, 9M11, and 9M19 all pose low effects to the MYLF. This is due to either MYLF being absent within the vicinity of these routes or MYLF occur at distances that are far enough away that effects to the species are expected to be low.

Route 9M15 poses moderate effects to the MYLF. The nearest MYLF occurrence to this route of over 1,000 feet.

Routes 9M03, 9M04, 9M12, 9M13, 9M14N, 9M16, 9M16A and 9M17 have all been designed with a season of use in order to minimize impacts to the MYLF.

Route 9M14A has been deteremined to be an existing system road (22N55Y). This route was retained in Alternative 2, but was dropped from consideration in Alternatives 4 and 5.

Route 15M05 does occur within a CIRA under Alternatives 2 and 5. The route was dropped from Alternative 4.

Comment 89

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M18 - Route Conflict(s): Citizen-inventoried roadless area, Agency-inventoried roadless area - Ranger District: Mount Hough

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, alternative 3 adds no proposed trails to the NFTS.

Comment 90

Action: Other/Unspecified

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 15M01 - Route Conflict(s): Citizen-inventoried roadless area, Astragalus pulsiferae area - Ranger District: Beckwourth

Response

Route 15M01 is identified in Appendix A as having extreme effects on TES species due to the presence of Astragalus pulsiferae var. pulsiferae. The route is included in Alternative 2, but not in Alternatives 4 or 5.

Comment 91

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M29 - Route Conflict(s): Citizen-inventoried roadless area, Critical Aquatic Refuge area - Ranger District: Mount Hough

Response

Route 12M29 was not analyzed in this project.

Comment 92

Action: Other/Unspecified

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 15M03 - Route Conflict(s): Citizen-inventoried roadless area, Critical Aquatic Refuge area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 15M04 - Route Conflict(s): Citizen-inventoried roadless area, Critical Aquatic Refuge area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 17M05 - Route Conflict(s): Citizen-inventoried roadless area, Critical Aquatic Refuge area - Ranger District: Beckwourth

Response

Route 15M03, 15M04 and 17M05 were dropped from Alternative 4. Additionally 17M05 was dropped from Alt. 5.

Comment 93

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M09 - Route Conflict(s): Citizen-inventoried roadless area, California Spotted Owl - Ranger District: Feather River

Response

Route 10M09 was dropped from Alternatives 3-5.

Comment 94

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M16 - Route Conflict(s): Citizen-inventoried roadless area, California Spotted Owl - Ranger District: Mount Hough

Response

Route 12M16 was dropped from Alternatives 3-5.

Comment 95

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M32 - Route Conflict(s): Citizen-inventoried roadless area, Ivesia webberi - Ranger District: Mount Hough

Response

Possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original determination of the species may have been in error or Ivesia webberi may have been extirpated from the site.

Comment 96

Action: Other/Unspecified

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 13M10 - Route Conflict(s): Citizen-inventoried roadless area, Montane meadow - Ranger District: Beckwourth

Response

Route 13M10 was dropped from Alternatives 3-5.

Comment 97

Action: Feather River District

Resource(s): Vegetation (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 4M02 - Route Conflict(s): Fritillaria eastwoodiae - Ranger District: Feather River

Response

PNF records do not include an occurrence of Fritillaria eastwoodiae along route 4M02.

Comment 98

Action: Other/Unspecified

Resource(s): Vegetation (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 14M07 - Route Conflict(s): Ivesia Sericoleuca - Ranger District: Beckwourth

Response

There are no records of Ivesia sericoleuca along route 14M07 in PNF database or the Califorinia Natural Diversity Database (CNDDB). There are occurrences of Ivesia sericoleuca in the general area but they are greater than 300 feet from the route.

Comment 99

Action: Mount Hough District

Resource(s): Vegetation (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M20 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M20A - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M21 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M21A - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M21B - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M21C - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M22 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M28 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M28A - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M29 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M30 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M31D - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M33 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M34 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M35 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M36 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M36A - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M38 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M39 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M34 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M52 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M54 - Route Conflict(s): Ivesia webberi - Ranger District: Mount Hough

Response

The occurrences of Ivesia webberi are historic. The sites were searched in 1990 and no Ivesia webberi plants were found. The original report of these occurrences may have misidentified the species or the plants may have been extirpated from the site.

Comment 100

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M36 - Route Conflict(s): Ivesia webberi, Critical Aquatic Refuge - Ranger District: Mount Hough

Response

Possible error. The site was searche in 1990 and no Ivesia webberi plants were found. The original determination of the species may have been in error or Ivesia webberi may have been extirpated from the site.

Comment 101

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M37 - Route Conflict(s): Ivesia webberi, Critical Aquatic Refuge, Lupinus dalesiae - Ranger District: Mount Hough

Response

Possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original determination of the species may have been in error or Ivesia webberi may have been extirpated from the site.

The site of Lupinus dalesiae along route 9M37 is identified in table 133 of the DEIS. The likely effects to this species are disclosed on p. 321.

Comment 102

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 8M11 - Route Conflict(s): Ivesia webberi, Critical Aquatic Refuge, Lupinus dalesiae, Arabis constancei - Ranger District: Mount Hough

Response

Possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original determination of the species may have been in error or Ivesia webberi may have been extirpated from the site.

The likely effects to Lupinus dalesiae are disclosed on p. 321 of the DEIS.

The likely effects to Arabis constancei are disclosed on p. 302 of the DEIS.

Comment 103

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M19 - Route Conflict(s): Ivesia webberi, California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 10M40 - Route Conflict(s): Ivesia webberi, California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M33 - Route Conflict(s): Ivesia webberi, California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M35 - Route Conflict(s): Ivesia webberi, California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M43 - Route Conflict(s): Ivesia webberi, California Spotted Owl - Ranger District: Mount Hough

Response

The occurrence of Ivesia webberi is a possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original species determination may have been an error or the plants may have been extirpated.

Comment 104

Action: Mount Hough District

Resource(s): Vegetation (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M55 - Route Conflict(s): Ivesia webberi, Lupinus dalesiae - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M56 - Route Conflict(s): Ivesia webberi, Lupinus dalesiae - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M56A - Route Conflict(s): Ivesia webberi, Lupinus dalesiae - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M57 - Route Conflict(s): Ivesia webberi, Lupinus dalesiae - Ranger District: Mount Hough

Response

Ivesia webberi sites on the PNF are believed to be extirpated; the site locations were searched in 1990 and no Ivesia webberi plants were found.

Neither PNF records nor California Natural Diversity Database (CNDDB) include occurrences of Lupinus dalesiae along routes 9M55, 9M56, 9M56A, or 9M57.

Comment 105

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M39 - Route Conflict(s): Ivesia webberi, Northern Goshawk - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M39A - Route Conflict(s): Ivesia webberi, Northern Goshawk - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M45 - Route Conflict(s): Ivesia webberi, Northern Goshawk - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M48 - Route Conflict(s): Ivesia webberi, Northern Goshawk - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M49 - Route Conflict(s): Ivesia webberi, Northern Goshawk - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M50 - Route Conflict(s): Ivesia webberi, Northern Goshawk - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M51 - Route Conflict(s): Ivesia webberi, Northern Goshawk - Ranger District: Mount Hough

Response

The occurrence of Ivesia webberi is a possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original species determination may have been an error or the plants may have been extirpated.

Comment 106

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M41 - Route Conflict(s): Ivesia webberi, Oreostemma Elatum, Critical Aquatic Refuge - Ranger District: Mount Hough

Response

The occurrence of Ivesia webberi is a possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original species determination may have been an error or the plants may have been extirpated.

Neither PNF records nor California Natural Diversity Database (CNDDB) include an occurrence of Oreostemma elatum along route 9M41.

Comment 107

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M40 - Route Conflict(s): Ivesia webberi, Oreostemma Elatum, Critical Aquatic Refuge, California Spotted Owl - Ranger District: Mount Hough

Response

The occurrence of Ivesia webberi is a possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original species determination may have been an error or the plants may have been extirpated.

Neither PNF records nor California Natural Diversity Database include an occurrence of Oreostemma elatum along route 9M40.

Comment 108

Action: Mount Hough District

Resource(s): Vegetation (No TESS), Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS. Table 133.

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 8M18 - Route Conflict(s): Lupinus dalesiae - Ranger District: Mount Hough

Response

Table 133 on p. 320 of the DEIS includes this route and the associated occurrence of Lupinus dalesiae. The effects are disclosed on p. 320, "The close proximity of this species to the proposed trails would increase the probability of direct effects; however, these effects will likely not be severe enough to negatively impact this species due to its high tolerance to distrubance".

Comment 109

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M22 - Route Conflict(s): Northern Goshawk - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M23 - Route Conflict(s): Northern Goshawk - Ranger District: Mount Hough

Response

Route 11M22 and 11M23 were dropped from Alternative 4.

Routes were ranked low for wildlife (See Appendix A). Both routes are outside of Goshawk PAC and are located over 0.7 miles from the nearest PAC. Impacts to Goshawks are not anticipated from these routes.

Comment 110

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 6M19 - Route Conflict(s): Northern Goshawk - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M21 - Route Conflict(s): Northern Goshawk - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M32 - Route Conflict(s): Northern Goshawk - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M33 - Route Conflict(s): Northern Goshawk - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M25A - Route Conflict(s): Northern Goshawk - Ranger District: Feather River

Response

Route 6M19 was analyzed under Alternatives 2, 4 and 5

Route 6M21, 6M32, 6M33, 9M25A were dropped from Alternative 4.

Route 6M21 and 9M25A were additionally dropped from Alternative 5.

6M19 travels through portions of three Goshawk PACs (T17, T18, T46). The effects to these PACs and other Goshawk PACs are reflected in Tables 74 and 75 in the Goshawk section (3.7.13) of the FEIS.

6M21 does not travel through a Goshawk PAC. The nearest point on the route to a Goshawk PAC boundary is 0.17 miles. Topography and vegetation between the route and PAC should screen out the effects of motorcycle noise or activity to the PAC.

6M32 and 6M33 travel through Goshawk PAC T21. The effects to this PAC and other Goshawk PACs are reflected in Tables 74 and 75 in the Goshawk section (3.7.13) of the FEIS.

9M25A does not travel through a Goshawk PAC. The nearest point on the route to a Goshawk PAC boundary is 0.05 miles. Topography and vegetation between the route and PAC should screen out the effects of motorcycle noise or

activity to the PAC.

Comment 111

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M38 - Route Conflict(s): Northern Goshawk, Ivesia webberi, Critical Aquatic Refuge - Ranger District: Mount Hough

Response

Possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original determination of the species may have been in error or Ivesia webberi may have been extirpated from the site.

Comment 112

Action: Feather River District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M20 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M20 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M21 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M22 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 9M23 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Feather River

Response

Routes 9M20, 9M21, 9M22 and 9M23 all occur within a CAR. Routes 9M20 and 9M21 were designed with a season of use in order to minimize impacts to the MYLF. Routes 9M22 and 9M23 do not have season of use for MYLF since no frogs are found within the vicinity of these routes. These last two routes do have a season of use applied for other resources, but not for aquatic resources.

Comment 113

Action: Mount Hough District

Resource(s): Fisheries/Aquatics, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M32 - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M32A - Route Conflict(s): Critical Aquatic Refuge - Ranger District: Mount Hough

Response

Routes 9M32 and 9M32A are now shown as 9M32W and 9M32E in the FEIS (see appendix A) and do occur with in CAR. Route 9M32W poses moderate effects to MYLF due to the distance (>3,000') of the occurrance to the route. Route 9M32E was designed with a season of use for the MYLF in order to minimize effects to the MYLF.

Comment 114

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M19 - Route Conflict(s): Critical Aquatic Refuge, California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 5M11 - Route Conflict(s): Critical Aquatic Refuge, California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M13 - Route Conflict(s): Critical Aquatic Refuge, California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M11 - Route Conflict(s): Critical Aquatic Refuge, California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 8M01 - Route Conflict(s): Critical Aquatic Refuge, California Spotted Owl - Ranger District: Feather River

Response

Routes either occur in a CAR or within a PAC or both. Each route will be addressed individually due to the two resource issues raised (reference Appendix A).

Route 12M19 - this route occurs within a CAR, but does not occur within a PAC. This route was rated low (see Appendix A) for both the MYLF and Spotted owl since it does not occur within a PAC or near a known nest site or near a knonw MYLF occurrence.

Route 5M11 is included in Alternative 2 only. It was dropped from Alternatives 4 & 5 due to Calfornia Red-legged Frog concerns. Under Alternative 2, a season of use is applied to minimize impacts to this species. The route does not occur within a PAC, therefore no impacts or conflicts with owls are anticipated.

Route 5M13 does occur within a PAC. A season of use was appled to this route under alternatives 2 & 5 in order to minimize impacts to breeding owls.

Route 6M11 does occur within a CAR. This route was dropped from Alternatives 4 & 5 due to concerns for CRLF, but remained in Alternative 2 under a season of use. The route also occurs within a PAC, but due to route position and topography, it does not pose impacts to owls within the PAC.

Route 8M01 does occur within a CAR and minor portions of a PAC. The route was dropped from Alternatives 4 & 5 due to concerns for the CRLF, but remained in Alternative 2. The route meanders in and out of a PAC in small segments and does not pose impacts to owls within the PAC.

Comment 115

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 8M19 - Route Conflict(s): Critical Aquatic Refuge, Ivesia webberi - Ranger District: Mount Hough

Response

The occurrence of Ivesia webberi is a possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original species determination may have been an error or the plants may have been extirpated.

Comment 116

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M37A - Route Conflict(s): Critical Aquatic Refuge, Ivesia webberi, Lupinus dalesiae - Ranger District: Mount Hough

Response

The occurrence of Ivesia webberi is a possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original determination of the species may have been in error or Ivesia webberi may have been extirpated from the site.

The likely effects to Lupinus dalesiae are disclosed on p. 321.

Comment 117

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 8M13 - Route Conflict(s): Critical Aquatic Refuge, Lupinus dalesiae - Ranger District: Mount Hough

Response

The likely effects to Lupinus dalesiae are disclosed on p. 321.

Comment 118

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 6M16 - Route Conflict(s): Critical Aquatic Refuge, Northern Goshawk - Ranger District: Feather River

Response

Route 6M16 was dropped from Alternative 4.

Comment 119

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 6M02 - Route Conflict(s): Critical Aquatic Refuge, Pacific fisher - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M05 - Route Conflict(s): Critical Aquatic Refuge, Pacific fisher - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 6M06 - Route Conflict(s): Critical Aquatic Refuge, Pacific fisher - Ranger District: Feather River

Response

All three routes fall within the Jacks CAR. Routes 6M02 and 6M05 are included only in Alternative 2 and contain a season of use for the CRLF (see appendix A). Route 6M06 was dropped from all alternatives.

No fisher are currently found within the Jacks CAR, including those fisher re-introduced within the last year onto SPI owned lands to the west of Jacks CAR (A. Facka, personal communication). In addition, the routes fall outside the draft carnivore network, specifically the middle fork feather river and west segments of the network. No conflicts between the fisher and use of these routes in anticipated at this time.

Comment 120

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, section 3.8.9.1.3, p. 298.

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 16M04A - Route Conflict(s): Critical Aquatic Refuge, Pyrocoma lucida - Ranger District: Beckwourth

Response

Effects to the occurrence of Pyrrocoma lucida along route 16M04A are disclosed in section 3.8.9.1.3 on p. 298 of the DEIS.

Comment 121

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, section 3.8.9.6.6

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 7M11 - Route Conflict(s): Critical Aquatic Refuge, Penstemon personatus - Ranger District: Feather River

Response

Effects to the occurrence of Penstemon personatus along route 7M11 are disclosed in section 3.8.9.6.6 on p. 322 of the DEIS.

Comment 122

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: DEIS, section 3.8.9.6.6, p. 322.

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 8M04 - Route Conflict(s): Critical Aquatic Refuge, Penstemon personatus - Ranger District: Mount Hough

Response

The occurrence of Penstemon personatus along route 8M04 is included in table 134 on p. 322 of the DEIS. Effects to this species are disclosed therein.

Comment 123

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M01 - Route Conflict(s): Critical Aquatic Refuge, Proposed or Existing Wild and Scenic River corridor - Ranger District: Feather River

Response

10M01 was dropped from Alternatives 3-5.

Comment 124

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M20 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M21 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M34 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M36 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M37 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Response

None of the routes identified by the commentor (11M20, 11M21, 11M34, 11M36 or 11M37) occur within a Spotted owl PAC or a HRCA. One route 11M34 contains minor portions within Spotted Owl SOHA S2, but these amounts are

minor and do not pose conflicts with Spotted owls.

Comment 125

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Sections 3.7.10, 3.7.11 and 3.7.25

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 5M05 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M12 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M14 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M15 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M16 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M19 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M20 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M21 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Route Type: Unauthorized - Route ID: 5M22 - Route Conflict(s): California Spotted Owl - Ranger District: Feather River

Response

Route 5M05 is not located within or adjacent to a California Spotted Owl (CSO) PAC. The nearest PAC boundary is over 1.2 miles away from the route. Therefore, this route was rated low for wildlife.

Route 5M12 is located and travels through a portion of CSO PAC BU013. The analysis of impacts to PACs is included in Sections 3.7.10, 3.7.11, 3.7.25 and tables 67 and 68 of the FEIS.

Route 5M14 is located and travels through CSO PAC BU014. However this route is non existent and is not considered in Alternatives 3, 4, 5.

Route 5M15 is not in a PAC, and does not pose a conflict.
Route 5M16 is not in a PAC, and does not pose a conflict.
Route 5M19 is not in a PAC, and does not pose a conflict.

Route 5M20 is located and travels through a portion of CSO PAC BU082. The analysis of impacts to PACs is included in Sections 3.7.10, 3.7.11, 3.7.25 and tables 67 and 68 of the FEIS.

Route 5M21 is not in a PAC, and does not pose a conflict.
Route 5M22 is not in a PAC, and does not pose a conflict.

Comment 126

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 7M16 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 7M17 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 7M18 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 7M16 - Route Conflict(s): California Spotted Owl - Ranger District: Mount Hough

Response

Effects of routes 7M16, 7M17 and 7M18 are summarized in Appendix A. Routes 7M16 and 7M18 contain minor segments within a PAC, but those segments occur well over 0.25 miles from a known nest site. When added with topography and vegetation, impacts to owls on these routes are expected to be low. Route 7M17 does occur within the core of a spotted owl PAC. This route has been designed with a season of use under alternative 2, 4 and 5 in order to minimize impacts to breeding owls.

Comment 127

Action: Beckwourth District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M02 - Route Conflict(s): California Spotted Owl - Ranger District: Beckwourth

Response

This route (11M02) does not occur within a Spotted Owl PAC. No conflict with spotted owls has been identified.

Comment 128

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M44 - Route Conflict(s): California Spotted Owl, Oreostemma Elatum, Bald Eagle - Ranger District: Mount Hough

Response

Neither PNF records nor California Natural Diversity Database include an occurrence of Oreostemma elatum along route 9M44.

Comment 129

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M09 - Route Conflict(s): California Spotted Owl, Proposed or Existing Wild and Scenic River corridor - Ranger District: Beckwourth

Response

Route 11M09 does occur with in a PAC (see Appendix A). This route was dropped from alternative 4 and contains a season of use under alternatives 2 and 5 in order to minimize impacts to spotted owls during the breeding season.

Comment 130

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M13 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M13A - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M13B - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M13C - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M13D - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M14 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M15 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M15A - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M16 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 11M17 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M09 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M09A - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, alternative 3 adds no proposed trails to the NFTS.

Comment 131

Action: Beckwourth District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M10 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, alternative 3 adds no proposed trails to the NFTS.

Comment 132

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M10A - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 12M11 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Mount Hough

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, alternative 3 adds no proposed trails to the NFTS.

Comment 133

Action: Beckwourth District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M12 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M10 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M10A - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M10B - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 13M11 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 14M05 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 14M06 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Route Type: Unauthorized - Route ID: 14M09 - Route Conflict(s): Citizen-inventoried roadless area - Ranger District: Beckwourth

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural

resources, see Appendix A of the FEIS. Additionally, alternative 3 adds no proposed trails to the NFTS.

Comment 134

Action: Mount Hough District

Resource(s): Vegetation (No TESS), Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M46 - Route Conflict(s): Oreostemma Elatum, Ivesia webberi - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M46A - Route Conflict(s): Oreostemma Elatum, Ivesia webberi - Ranger District: Mount Hough

Response

The Ivesia webberi sites were searched in 1990 and no Ivesia webberi plants were found.

Neither PNF records nor California Natural Diversity Database (CNDDB) include occurrences of Oreostemma elatum along routes 9M46 and 9M46A.

Comment 135

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 9M42 - Route Conflict(s): Oreostemma Elatum, Ivesia webberi, California Spotted Owl, Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M42A - Route Conflict(s): Oreostemma Elatum, Ivesia webberi, California Spotted Owl, Critical Aquatic Refuge - Ranger District: Mount Hough

Route Type: Unauthorized - Route ID: 9M42B - Route Conflict(s): Oreostemma Elatum, Ivesia webberi, California Spotted Owl, Critical Aquatic Refuge - Ranger District: Mount Hough

Response

The occurrence of Ivesia webberi is a possible error. The site was searched in 1990 and no Ivesia webberi plants were found. The original species determination may have been an error or the plants may have been extirpated.

PNF records do not include occurrences of Oreostemma elatum along routes 9M42, 9M42A, and 9M42B. California Natural Diversity Database includes an occurrence of Oreostemma elatum in the area but it is greater 400 feet from these routes.

Comment 136

Action: Beckwourth District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 12M04 - Route Conflict(s): Proposed or Existing Wild and Scenic River corridor - Ranger District: Beckwourth

Response

There are no proposed routes in the "Wild" portion of the Designated Wild and Scenic River. The only routes being added are in the "Scenic" and "Recreation" portion of the Designated Wild and Scenic River. The 1988 Plumas Land and Resource Management Plan standards and guidelines for Rx-2 Wild and Scenic River Prescription in the "Scenic" are as follows: Construct campgrounds and other developments hwich enhance recreation use. To the extent possible, design and manage recreation developments (including access) to avoid areas of high fire hazard and to prevent ignition and spread of wildfire. Permit overnight use of undeveloped places. Establish and enforce occupancy rules as needed. The "Recreation" portion is as follows: Develop day-use recreation sites near the river according to the Recreation Zone Recreation Managemen Plan (2/15/80). In neither case does it express prohibit route designation, except in the "Wild" portion, which have no routes in the action alternatives.

Comment 137

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 11M08 - Route Conflict(s): Proposed or Existing Wild and Scenic River corridor, California Spotted Owl - Ranger District: Mount Hough

Response

There are no proposed routes in the "Wild" portion of the Designated Wild and Scenic River. The only routes being added are in the "Scenic" and "Recreation" portion of the Designated Wild and Scenic River. The 1988 Plumas Land and Resource Management Plan standards and guidelines for Rx-2 Wild and Scenic River Prescription in the "Scenic" are as follows: Construct campgrounds and other developments hwich enhance recreation use. To the extent possible, design and manage recreation developments (including access) to avoid areas of high fire hazard and to prevent ignition and spread of wildfire. Permit overnight use of undeveloped places. Establish and enforce occupancy rules as needed. The "Recreation" portion is as follows: Develop day-use recreation sites near the river according to the Recreation Zone Recreation Managemen Plan (2/15/80). In neither case does it express prohibit route designation, except in the "Wild" portion, which have no routes in the action alternatives.

Comment 138

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Appendix E Proposed Additions

Route Type: Unauthorized - Route ID: 10M13 - Route Conflict(s): Proposed or Existing Wild and Scenic River corridor, Citizen-inventoried roadless area - Ranger District: Beckwourth

Response

There are no proposed routes in the "Wild" portion of the Designated Wild and Scenic River. The only routes being added are in the "Scenic" and "Recreation" portion of the Designated Wild and Scenic River. The 1988 Plumas Land and Resource Management Plan standards and guidelines for Rx-2 Wild and Scenic River Prescription in the "Scenic" are as follows: Construct campgrounds and other developments hwich enhance recreation use. To the extent possible, design and manage recreation developments (including access) to avoid areas of high fire hazard and to prevent ignition and spread of wildfire. Permit overnight use of undeveloped places. Establish and enforce occupancy rules as needed. The "Recreation" portion is as follows: Develop day-use recreation sites near the river according to the Recreation Zone Recreation Managemen Plan (2/15/80). In neither case does it express prohibit route designation, except in the "Wild" portion, which have no routes in the action alternatives.

Letter 215

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Land Designation and Management

Disposition: Resolved: Analysis modified (SEE RESPONSE)

In the DEIS for the Plumas National Forest Public Motorized Travel Management Plan DEIS there are numerous references to both Citizens Proposed Inventoried Roadless Areas (CIRA) and to Special Interest Areas. Yet within the DEIS, there is no reference to the sizes and locations of these areas. On the maps displaying the Alternatives, these areas are not displayed.

Why is this information being withheld and not published in the DEIS? I realized that these areas are stated as proposed, but if the Alternative containing them is selected, then the public has, at the Decision of the Forest Service, inherited a lot of Roadless and Special Interest Areas which then closed off these areas from Public Use other than viewing in many cases.

I would appreciate knowing where these areas are located and how large they are. Is there anyway on these areas that information can be presented to [me] and to the Public for their consideration? I would also like to know who submitted these areas for inclusion in the DEIS. I have been unable to find any reference to that information in the DEIS.

Response

A map of Citizen Inventoried Roadless Area locations and Special Interest Areas will be provided in the project record.

Letter 216

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Recreation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

In review of the Maps contained as a part of the DEIS, I find that there are a limited number of Loop Routes. There are many Maintenance Level 3 roads which break up the Maintenance Level 2 roads and trails and longer rides that in the past would last most of the day as the rider could access and ride on a Maintenance Level 3 road until they reached their desired point to leave that road and ride on a trail or a Maintenance Level 2 road to their destination. This required the use of Maintenance Level 3 roads. In the proposed Alternatives, the use of OHV on these roads is prohibited. This restriction has created many short routes and has eliminated many loop rides. Under the language in the plan, OHV riders will only have shorter rides available for their use. After each of these short rides, they will be required to return to their vehicle and trailer, load up and drive to the next location where they can take another short ride.

This requirement will create a problem which has not been addresses or considered in the DEIS Alternatives. The Problem is adequate parking space at the junction of these Maintenance Level 3 roads and the trails or Maintenance Level 2 roads where OHV rides begin. If there is more than one or two OHV riders with their pickups, jeeps and trailers already parked near the junction , there will not be space for another OHV rider to use that ride as there will be insufficient space to park another vehicle and trailer to off load and take a ride in that area.

Most junctions are not designed to permit space for more than one or two vehicles and trailers. When more users attempt to park and ride in these areas than there is space to park, the roads at the junction become blocked or restricted. This creates narrowed roads and possible vehicle accidents. Another factor is that many Disabled and Elderly OHV users that require flat areas to enter or leave their vehicles and OHV's. The areas at most junctions do not provide enough level space to provide for enough level space for multiple OHV users to begin their rides. The result will be many unhappy OHV riders who will be unable to take the rides who will need to return home or find a less desirable place to ride.

Response

The purpose of the Plumas National Forest Public Motorized Travel Management Plan is to legally comply with the Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, and prohibit motorized cross country travel by designation of roads and trails available for vehicular travel by vehicle type.

Development of staging areas and trail heads is beyond the scope of this analysis. The Forest has the ability to analyze specific situations and needs for facilities in the future. The Decision does not restrict the Forest's ability to develop OHV related infrastructure.

Comment 2

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

A question that many people have asked when they have been informed that they will not be permitted to ride their OHV's on Maintenance Level 3 roads where they have ridden for years is, WHY NOT? If a street licensed motorcycle can ride on the dirt or gravel surfaced Maintenance Level 3 road, why can't I ride my Green Sticker Single-Track Motorcycle or ATV on the same road. I do no more damage to the road than the Street Licensed vehicle. The answer that must be given in that the US Forest Service states that the Maintenance Level 3 Roads should allow the same traffic as Maintenance Level 2 Roads.

Maintenance Level 3 roads are built differently and meet the specifications of a highway per the regulations in the California Vehicle Code (CVC). This is the policy that is given in Region Five for the Forest in California. That answer does not satisfy anyone that asks the question. Maintenance Level 2 and 3 roads are no different to the OHV rider. They can not distinguish one type from the other. Both generally have dirt and gravel surfaces, the same grades and widths and look the same to them. I suppose the solution will be for the Forest Service to sign each road to let the public know what Maintenance Level road they are riding. This will mean placing a sign at each road junction stating the Maintenance Level. Another cost and more tax dollars to enforce a plan that is unnecessary.

But According to the CVC definitions Forest Service Maintenance Level 3 roads may not be difference than Maintenance Level 2 roads as they are not considered "Highways" under the following CVC regulations.

"Street or Highway-Highway Exclusion 592:
"Highway", for the purposes of Division 3 (commencing with Section 4000), Division 12 (commencing with Section 24000), Division 13 (commencing with Section 29000), Division 14.8 (commencing with Section 34500), and Division 15 (commencing with Section 35000), does not include a way or place under the jurisdiction of a federal governmental agency, which lies on national forest or private lands, is open to public use, and for which the cost of maintenance of such way or place is borne or contributed directly by any users thereof."

"Applicability of Provisions 38001. (a) Except as otherwise provided, this division applies to off-highway motor vehicles, as defined in Section 38006, on lands, other than a highway, that are open and accessible to the public, including any land acquired, developed, operated, or maintained, in whole or in part, with money from the

Off-Highway Vehicle Trust Fund, except private lands under the immediate control of the owner or his or her agent where permission is required and has been granted to operate a motor vehicle. For purposes of this division, the term "highway" does not include fire trails, logging roads, service roads regardless of surface composition, or other roughly graded trails and roads upon which vehicular travel by the public is permitted."

I believe that per the language in the CVC should not apply to Maintenance Level 3 Forest Roads because: the CVC definition of a "highway" excludes roads under the jurisdiction of federal government, and roads on national forest land; and the term "highway" does not include logging roads.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on langauge and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads.

Letter 217

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Disabled and elderly use

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

I completed reading the Plumas National Forest Travel Management Plan, I understand that you are or will be making changes to the Alternative in the DEIS that will eliminate routes from OHV use. I understand that the routes will be available for use by the average healthy individual who is able to hike these routes to reach an area that they have used to picnic, hunt, relax, do some fishing, and enjoy many of other activities.

Yet someone like me, that cannot walk or hike will be will not have that privilege because I will be prohibited or restricted from these activities in these areas because of my disability and neither will those who are elderly and are not healthy.

I have been reading some of the various laws that pertain to Federal Government activities and I find that in the Rehabilitation Act (1973), Section 504 that it states that "no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under "any program or activity that receives Federal financial assistance or is conducted by any Executive agency or the United States Postal Service."

When you prohibit the use of roads or trails that reach areas that I have used in the past and will want to use in the future by riding my ATV, and still permit access across these areas by the general public who reach these areas

by hiking and walking, you are discriminating against me and a class of people of are restricted by physical conditions or the elderly.

I am asking you to seriously consider the restrictions that you are proposing in the Alternatives in the Plumas National Forest Travel Management Plan DEIS and their Discriminatory affects that they place on the Disabled and the Elderly who cannot hike or walk to reach areas that provide enjoyment, relaxation, and recreation to us.

Those of us who need to use vehicles such as pickups and ATV's to reach locations on the Forest where we can enjoy and participate in the same activities as the general public, are being placed into a separate Class. This can be determined to be an act of Discrimination.

Please review the attached documents. If you continue to restrict areas that we have used in the past and would use in the future, I feel that you are willingly discriminating and violating the provisions of the Rehabilitation Act, Section 504. Please review the attached documents for information of the Laws as it affects the operation of the USDA and the Forest Service.

I am asking that you reconsider your proposed actions that will restrict the use of the Plumas National Forest by the Disabled and the Elderly who depend upon motorized means to reach areas of the Forest for their enjoyment. I am expecting that in light of the attached Legal Information that you will appropriate changed in your selected Alternative to provide access into the Forest for all Americans.

The Rehabilitation Act of 1973 states that each Agency within the Executive Branch of the Federal Government has its own set of regulations that covers their operations and meets the terms of the Rehabilitation Act. One of the attachments that I included to this message includes a copy of the USDA regulations for the Rehabilitation Act.

Response

Although the various alternatives considered in the FEIS include restrictions on where public wheeled motor vehicle use will be allowed, all of the alternatives maintain a significant number of miles of roads and trails open to motor vehicle use.

The Rehabilitation Act of 1973, which was amended by the Americans with Disabilities Act of 1990, set the direction that no person with a disability can be denied participation in a Federal program that is available to all other people solely because of their disability. This Travel Management project is designed to provide reasonable access for public wheeled motor vehicles and the decision to be made would apply to all Forest visitors. As stated in the preamble to the national Travel Management regulations, there is no requirement to allow people with disabilities to use motor vehicles on road or trails otherwise closed to motor vehicles since such an exemption could fundamentally change the travel management program (Fed Reg V.70, No. 216, p 68285).

Comment 2

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1] Rehabilitation Act of 1973

Comment 3

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2] USDA Section 504 Regulations 7 CFR [sections] 15b.1 - 15b.42
Part 15b -- Non-discrimination on the basis of handicap in programs and activities receiving Federal financial assistance.

Comment 4

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 3] A Guide to Disability Rights Laws
Author: U.S. Department of Justice, Civil Rights Division, Disability Rights section
Date: September 2005

Comment 5

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 4] Rehabilitation Act
Author: U.S. Department of Education

Comment 6

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 5] Section 504, Rehabilitation Act of 1973

Letter 218

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

The reference data and tables used to support their [resource specialists] opinions and statements in the DEIS is gathered from other areas, Forests, and Specialists that have little or no experience on the Plumas National Forest. An example is the seven page section describing the Wolverine and the Red Fox. The information was interesting, but as stated at the end of the section, these animals are not on the Forest. Why was this information included in the DEIS? Was there a requirement for each Specialist to produce a document with a specific number of pages and these seven pages satisfied that requirement.

Response

Although the commentor is correct that no wolverine or red fox have been detected on the PNF, the Forest Service under Forest Service Manual Direction at 2670, is requried to assess the effects to suitable habitat for these species that are listed as Forest Service Sensitive Species by the Regional Forester.

Comment 2

Action: Adequacy of Studies (Best Available Science)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

The statements or tables in most of the specialist's input states that the use of OHV's and motor vehicles on Forest roads and trails create damage to the plants, soils, or animals in their area of specialty.

Examples given in the narratives are that Vehicle or OHV use creates ruts in the roads, dust in the air that spreads through the Forest and damages plants, that they spread noxious weed seeds, damage and deepen stream crossings and the animals and fish that reside in those habitats. Many of the Forest roads and trails block the access of frogs and other amphibians from reaching their desired habitat or streams and upset birds such as eagles, owls, and hawks nesting along roads. If that is a negative, why are they still living in those areas? Their narratives emphasize the negative affects that OHV's have on the habitat and the environment, but fail to note that Licensed Vehicle Traffic, including Forest Service vehicles driving on Forest roads have the same affect on the environment. If traffic is doing that much damage to the Forest environment perhaps all traffic should be blocked from use of Forest roads. Let the fires burn and that action will not block Forest projects as there are only few or no timber sales occurring. Forest Service and regular traffic should be restricted from using the Forest Service roads. And Forest visitors, they can be turned around at the Highways and County Roads too. Please refer to page 31 of your DEIS under Cumulative Effects for the definition of these Effects that supports my observations and statements. If the emphasis in your DEIS is the negative effects of OHV use then consider and include those of all motor vehicles that use the Forest Service roads and gain a complete set of data for and unbiased but complete analysis of what is occurring to the environment along roads and trails in the Forest.

Response

For the Terrestrial Wildlife analysis, the effects to species and species habitat was based on defined set of evaluation criteria, whether it was set distance from a proposed trial (i.e. 0.25 miles) or a buffer applied to a proposed trail (i.e. 200 meters). For the sake of this analysis it was assumed that use of the routes (not vehicle type) would be the effect analyzed, since route specific use data was not available. Therefore, the evaluation criteria were based on scientific studies referenced in the document and applied in a consistent manner across all alternatives in order to evaluate impacts (noice, displacement, avoidance of habitat, etc). Please refer to the Terrestrial Wildlife Analysis in Chapter 3 of the FEIS. Each table listed will show the evaluation criteria applied for the set of data collected.

Comment 3

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

From the data presented in the DEIS, I would presume that walking cross-county would have a similar effect of damaging the Forest environment. What about a crew of 20 firefighters walking cross-county to reach a fire? What about a group of hikers in the Bucks Wilderness or hikers and fishermen along the Middle Fork of the Feather River. From the data that I read in the DEIS, their hiking damages the environment as well.

As far as roads, only certain roads will be able to driven by specific types of vehicles. I wonder if in making that determination, the affects of vehicle traffic on the Forest environment was taken into consideration. Factors such as noise, dust, and exhaust? Or was it the fact that some vehicles require different types of license plates or stickers (Green Sticker) and vehicle registration? The fact that all vehicles create dust and ruts in the roads and disturb plants and animals in the Forest, as well as making more noise than people, did not seem to make a difference in which roads are being made available to specific types of vehicles. So the rest of the Specialists must not have had input to the Engineering group when the decisions were made on which roads and trails will be left open to use in the Forest Plan. That demonstrates a Lack of Team effort in completing the report.

Response

Vehcile type by trail was determined by current tail use. Some route near population centers were not included due in this effort due to noise. This EIS deals only with Part B of the Travel Management Rule, designating new trails and areas, not analyzing existing roads and trails.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I suppose that I have stated enough examples of the negativity and repetitious statements that I have found in the nearly 500 pages of the DEIS. After 4 days of reading this document, the above statements are examples of what I found. An assignment to provide negative and contradictory information to the use of OHV's on the Plumas. Well, the assignment given to the Specialists was completed correctly. It is too bad that it does not reflect the actual conditions that the use of OHV's have on the Forest environment and roads. But when you have a team assigned to write analysis on a topic that do not have and have not used and experienced the use of the equipment they are referring to in their narratives, I guess this is what you can expect to be the product.

Comment 5

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I am expecting that the completed Environmental Impact Statement for this program or project will be completed in a complete and correct manner without the errors and mistakes that I brought to your attention. And those that I have stated in this document are just a few of many repetitious statements and presumptions that are contained in the document. It appears that it was produced and printed without a thorough review of the information presented in the document. That seems to be the major problems that the Forest Service is exhibiting in all of their Environmental Documents over the past few years and the primary reason that its projects are being shut down and having to be competed repeatedly.

I can only hope that your work on the EIS is much improved and can withstand the threat of litigation which is almost a guaranteed occurrence with this quality of document. A poor job by the uniformed!

Comment 6

Action: Decisionmaking Philosophy

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have a comment concerning the contents of the Draft Environmental Impact Statement (DEIS) that was written for the Plumas National Forest Transportation Plan which covers primarily OHV use. The primary purpose that is apparent in the content of the document and described by the specialists input in their respective sections, is that OHV use is not going to be permitted on the Forest except on approved maintenance level 2 roads and a very few approved trails and one possible specific area on the Feather River Ranger District. This Negative Attitude is apparent throughout the document.

Response

OHV use will be permitted on over 4500 miles of system roads and trails. Unlicensed vehicles will be not allowed on low clearance passenger car maintained roads except for the Slate Creek Road (24N28).

Letter 219

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter

Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

I am submitting to your Team a proposal for the addition of routes in the Grizzly Ridge area into the Plan and the addition of them into the Forest Transportation System. Portions of the routes that I am requesting to be added to the Plan are made up of old logging roads, spur roads and a cross county route. These routes are shown on the Maps for Alternatives #2 and #5 of the DEIS for the Plumas National Forest Public Motorized Travel Management Plan.

These routes are on Grizzly Ridge area northwest of the Brady's Camp area. I am aware that there is a Proposed Special Interest Area in the Brady's Camp area. I have completed several telephone calls and email messages with two Plumas NF Botanists concerning this Proposed Special Interest Area. The routes that I am proposing are outside of the primary and sensitive areas within the Botanically Sensitive Area within the SIA. The Primary Sensitive Areas described to me are the areas meadow areas and habitat through the valley along Pine Creek, and the transition areas adjacent to the meadows. Brady's Camps is adjacent to this Proposed Special Interest Area.

The routes that I am proposing are located to the east and above the meadow and creek areas and are outside of the sensitive portions of the proposed area. Roads and trails are permitted within Special Interest Areas as long as they do not damage or adversely affect the proposed area. These routes use old skid trails, spur roads, and crossing the ridge top. The ride the entire Proposed Trail you pass through some brushy areas and skirt Red Fir thickets.

My preference would be include each of the three segments of the proposed routes into the Plan and the Forest Road System. My preference is to begin the ride from the location where 11M13B leaves 24N19A as shown on the Alternative #2 map. This is the most southern section of the trails segments showing on the maps for Alternative #2 and #5. I am requesting this portion be included as it is less steep and has more level areas than 11M13 where it leaves spur road 24N19A. It is an easier ride than 11M13. Where it leaves 24N19A and climbs up to meets 11M13B.
At the junction of 11M13 and 11M13B is a unique geologic formation. It is a Devil's Post Pile. This formation can not be seen from anywhere else below on the ridge or from across the valley in the Argentine Ridge area. From the junction of 11M13 and 11M113B, the trail reaches and follows the top of the ridge. From this area, looking to the east, you can see many well known mountains and other features such as Mt Ingalls, Peel Ridge, Kettle Rock, and the Escarpment above SH395. To the west you can see the Argentine Ridge and Rock areas, Pilot Peak, Mt Filmore, Mt. Etna and Eureka Peak. 11M13 then follows the ridge and climbs to the highest point on the route at the northern end of 11M13. At the northern edge of this flat area, 11M13 ties into 11M13A. This is in old Red Fir logged area. The route follows several skid trails down to spur road 24N19A. The skid trails have water bars in them that are well established and will not be damaged by the crossing of the OHV's or Single Track Bikes that follow this Proposed Route. When you reach 24N19A, you can drop down on to FS25N09 or turn south and ride Forest spur road 24N19A back to FS24N19. From there you can ride north to FS25N09 and turn south toward Brady's Camp. FS25N09 and FS24N19 are Maintenance Level 2 roads. OHV Use is permitted on these roads.

There are two other Proposed Routes to the North of this area along FS24N19 that should be included in the Plan and added to the Plumas FSM Plan.

The first is 11M17. This is reached by an old road to a Dispersed Hunters Campsite. It is immediately adjacent to the brush field at the top of Grizzly Ridge. The road into this area is rocky and appeared to have no erosion problems. The most important fact that several of us found during a couple days of searching was that the southern or right route into this area does not exist.

The second routes are 11M18 and 11M18A. These routes are old routes that reach the top of Grizzly Ridge where hunters probably began their hunts. The routes are useable by pickups and OHV's. From the end of each of these routes, there are tremendous views of the areas of Genesee Valley and the county to the north and east. These routes do not exhibit drainage damage as they receive minimal use and on a rocky base at top of Grizzly Ridge.

All of the Proposed Routes included in this request that I have described should be included in the plan as useable routes for OHV equipment.

Response

111M17, 11M18, 11M18A are included in Alternative 2 and 5. 11M13, 11M13A and 11M13B were modified in Alternative 5 to provide for better access to these areas. 1M10 and 11M11 were added to Alternatives 4 and 5.

Comment 2

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Map of Proposed Routes for Grizzly Ridge, By: Rex Fisher.

Letter 220

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

During the period of the Summer of 2008, there were many Proposed Routes on the Plumas National Forest that were open for review and analysis by both the US Forest Service and by individual who were members of groups such as the Sierra Access Coalition (SAC). In many cases, some of these routes were not surveyed as there was not time or personnel available to complete the necessary reviews during the allotted time frames.

Two of those Proposed Routes were 11M10 and 11M11. They are located on the south end of Grizzly Ridge in the Beckwourth Ranger District. Proposed Route 11M10 connects to Route 11M12 in northwest corner of Section 23, approximately a one mile south of the junction of FS 25N42 where is crosses Grizzly Ridge. Approximately a mile from that junction, Proposed Route 11M10 joins Proposed Route 11M11. Proposed Route 11M11 ties into both FS 24N02X on the west side of Grizzly Ridge, above the Greenhorn Area and to FS 24N50C on the east side of Grizzly Ridge in the Emigrant Creek Drainage. These Proposed Routes provide Loop Routes for the OHV riders in the Greenhorn and Sloat areas and others who ride the Grizzly Ridge area.

I was able locate the north junction of Proposed Route 11M10 where it ties into Route 11M12. I flagged junction in a very this brushy location with red flagging and the route numbers. The person who was with me that day walked up the ridge on 11M10. He followed the Proposed Route (trail) to a point above the location where the Walker Mine Tramway crossed Grizzly Ridge and dropped down into Spring Garden. He told me that he could tell where the Tramway was located because the trees were younger and smaller than those on either side. There were also the remains of an old Tramway building along the 11M10.

The Proposed Trail 11M10 through that area had been covered by a Tractor Line that was put into for the last holding line for the Greenhorn Fire that had burned the area years before. Since that time, the Tractor Lines have grown in with brush and trees. The same thing has occurred on Proposed Route 11M11 that ties into the two FS routes, one on East and West sides of Grizzly Ridge. The fellow who hiked up the trail told me that there were a number of small trees that had fallen across the trail. He told me that they were too large to move by hand so we did not ride over the trees and up Proposed Trail 11M10. It was late in the afternoon, and I doubt that we would have been able to scout out 11M10 and 11M11 that day. I have not had the time to return to that area to continue to examine these Proposed Routes.

I have spoken to another member of SAC who lives in the Greenhorn area. Both he and his wife ride these routes several times a year. He has told me that the route is brushy but open to both Quads and Single-Track Motorcycles.

He told me that these routes are used during the winter by snowmobiles. He described to me where each trail met the Forest Service roads and various landmarks along these Proposed Trails. He told me that in many places in the past, he had ridden over the smaller trees rather than removing them from the trail. I asked him how long it would take to clear these trails of the brush and trees. He indicated that it would take a couple people two or three days. He told me that it would be an annual job as the trails do not remain open all year. As the Proposed Trails are on the ridge top, each year trees fall across the trails as they are both subject to high winds and snow.

I mentioned to him that the US Forest Service did not really consider a trail useable or feasible if it was not open for use during the season that it was available for use, in this case free of snow. He told me that was a poor presumption as those trails were excellent loop trails to several areas such as the Grizzly Ridge area, the Walker Mine area, as well as other areas east of Grizzly Ridge. He told me that he and his family planned to continue to use these trails.

Later that day, I opened up the "Google Earth" Program on my computer and centered in on the areas of 11M12, 11M10, and 11M11. I located the 11M12 road and the junction to 11M10 that I had flagged. Following the portion of the map, (MtHough-12-26-07), that displayed the locations of these proposed Trails and the points where they tied into FS roads and into 11M12. I was able to focus in on and find parts of the trails to a degree that I am sure that I have located most of both Proposed Trails (1M10 and 11M11) on the Google Map as I adjusted the location and magnification of various views of the terrain. I view various landmarks that are located along the trails that my friends described. Portions of the trails were very visible on map when the magnification was increased. I was able to determine the locations of these two Proposed Routes (11M10 and 11M11). I have plotted them out on a copy of the Google Map and have attached a copy of that map and a copy of the MtHough_12_26_07 map that displays these Proposed Routes to this memo. I am asking that both of these routes be included in the EIS as existing Routes and that they both become a part of the Forest Transportation Plan.

I am asking that the information in Table 157 Proposed Trails in Appendices A, on page 381 of the DEIS be corrected. It currently lists both of these trails or Proposed Routes (11M10 and 11M11) as Non Existent. They both exist and both are used annually.

As the result of lack of time and effort that has been available to both Forest Service employees and interested volunteers, there was not time to survey all of the routes that have been submitted to the Forest in this program. This is an example of two routes and as well as many others that have not been surveyed and have been discarded from the list.

I have taken it on myself to confirm the existence of these two trails and the fact that with some maintenance by with the Forest Service or by volunteer groups, they can be put into useable condition that meets the Forest Service requirements for trails. The locations of most of these trails appears to be located on ridge tops, I would suspect that there would be very minor impacts to any Specialists area. A note of information: Both of these Existing trails are located on the Beckwourth Ranger District.

Response

11M10 and 11M11 were added to Alternatives 4 and 5.

Comment 2

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1:] map of proposed routes for Mount Hough

Letter 221

Attributes

Attribute	Value
Early Attention	Provides proposals for new alternatives
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested

Request Information None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The purpose of the route designation process is to "...prevent resource damage and recreational use conflicts from indiscriminate, cross-country travel by motor vehicles. Use will be redirected to existing sustainable roads, trails, and areas." (Route Designation Guidebook, USDA Forest Service, 1, 2006)

Then Forest Service Chief Dale Bosworth "... listed four key threats facing the National Forests. One of these is "unmanaged recreation" with OHV use off established roads and trails cited as the primary threat." (Route Designation Guidebook, USDA Forest Service, 1, 2006)

Thus, the intent of the Travel Management Rule is to eliminate cross-country travel and direct travel to existing sustainable routes. It is my belief that the PNF and its "Preferred Alternative" has reached far beyond the original intent of the route designation process with its massive route closures and unreasonable seasonal restrictions, resulting in a proposal that severely limits motorized recreation.

I support the concept of a managed OHV system of roads and trails which includes the prohibition of cross-country travel. However, I do not support the closing of existing routes that have been historically and legally used by OHV, routes that are part of the current condition of the forest.

Comment 2

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The "Preferred Alternative" is proposing to close several critical trails that provide connectivity and loop opportunities that would significantly enhance recreational value and in some cases enhance public safety. These critical trails have been omitted from the "Preferred Alternative" despite their historic use and evidence of long-term sustainability.

It believe that the "Preferred Alternative" is reasonable regarding the number of roads designated as "Open to Highway Legal Vehicles Only". However, I would like you to consider analyzing a few short sections to be designated as "mixed use" to allow a green sticker vehicle to connect trail segments.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The original intent of the Travel Management Rule was to stop what the Forest Service perceived to be occurring in the forest, indiscriminate cross-country travel. The Forest Service and someone unfamiliar with OHV has a perception that traveling cross-country is synonymous with riding "willy-nilly" anywhere they choose to in the forest. While in some isolated instances this may be true, the evidence that has been provided as a result of the route designation process has proved just the opposite. By the very nature of the topography of the forest and the density of vegetation it is nearly impossible to travel "willy-nilly" in the Plumas National Forest. Human's take the path of least resistance,
and like generations before us, we travel by trails, and the proof of this can be found within your own DEIS. The trail survey conducted for this process resulted in 225 miles of single track trail suitable for motorcycles. How many miles of "willy-nilly" evidence has been discovered? I would suggest near zero, because it is not even referenced in the DEIS. The DEIS supports the claim that OHV has had all along, that OHV's travel on existing trails, and is not traveling randomly through the forest.

Motorized recreation has suffered from a false negative perception of "willy-nilly" travel through the forest. It is that perception, that never materialized, which resulted in this process today to stop indiscriminate cross-country travel. Unfortunately this process has been hijacked, and is being used to close existing
routes, many of which have existed for generations. OHV in a sense has been "falsely accused" and the evidence has shown "not guilty". However, instead of being exonerated and allowed to go on our way, it appears that OHV will have to serve a life sentence of trail closure. Justice is not being served.

Response

The majority of motorcycle routes on the west side of the Plumas National Forest were user created. The remaining routes utilized overgrown skid trails, temporary roads and old railroad grades. Many of these trails are causing resource damage that requires mitigation. We would like to work with motorcycle groups to develop sustainable, properly located trails for motorcycle use.

Comment 4

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the EIS either be amended, or a supplemental EIS be drafted in accordance with 40CFR1502.9(c)(1), to provide an Alternative that acknowledges, protects, and provides access to all existing routes to include all of the unique, challenging, and world-class single track motorcycle trails that currently exist in the Plumas National Forest.

Response

The trails that have Extreme resource effects require additional NEPA because new trail constructed is need to resolve the extreme resource concern. No new trail construction can be proposed with this project. If a trail needs new construction, additional NEPA will be required at the District Ranger level.

Comment 5

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Seasonal Closure
Winter and spring seasons provide the prime riding conditions of the year. Several days after a rain the ground holds enough moisture to eliminate dust and provide good traction. The result is decreased health and safety risks as the user is not inhaling dust and the users visibility is increased which allows increased ability to see and avoid trail obstacles. These factors along with comfortable temperatures make winter and spring the most enjoyable time to recreate in the forest.

OHV recreation with the proper amount of moisture on the ground helps to lessen the impact on the trail.
The use of OHV's on trails containing proper amounts of moisture, compacts the soil and helps to "harden" the surface, reducing dust in the dry season.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. This section recognizes that compaction of designated trail travel way is beneficial in creating a good running surface on native materials. Compaction is optimal when soil voids are only partially filled with water. When soils are fully saturated, soil strength is low and rutting commonly occurs. The season of use mitigation is designed to prohibit motorized traffic on certain trails when soils are near or at full saturation.

Comment 6

Action: Consider Additional Information

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I do not support the proposed seasonal closure of the PNF. There is no scientific or historical data regarding rainfall or snowpack on the PNF in the DEIS to support a seasonal closure. If such data existed, I would suggest that it is likely that evidence would show that there were periods of dry weather, suitable for OHV recreation, that would have fallen within the seasonal closure dates.

For example, please review the attached documents that can be downloaded from here:

http://www1.ncdc.noaa.gov/pub/orders/1C3F71BA-94D8-F4E3-0B48-9D2BDD7761B8.PDF
http://www1.ncdc.noaa.gov/pub/orders/2258234A-92A5-9E63-B3CE-5CA862A3B24F.PDF

These documents depict the historical weather for the months of December 2008 and January 2009 at Lake Oroville, CA. You will notice that there were several significantly dry periods that would have been suitable for motorized recreation. The first 12 days of December 2008 had zero recorded precipitation. Likewise, from January 7 to January 21, 2009 there was zero recorded precipitation. In these two months alone, the PNF had nearly four weeks of perfect riding conditions that would have been prohibited had the proposed seasonal closure been implemented. This would have been completely unreasonable.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. The mitigation is supported by monthly precipitation data collected by California Department of Water Resources between 1996 and 2008 recorded at the Brush Creek rain gauge. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist.

Comment 7

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I do support a "wet weather" closure policy similar to other areas in R5 forests. This would allow the PNF to manage the area in a manner that protects the resources during periods of wet weather unsuitable for OHV recreation and also allows for reasonable OHV recreation after soil conditions become suitable.

Response

The federal Office of General Counsel has advised the PNF to not implement a season of use mitigation for soil and water resources that is based upon precipitation data because precipitation data do not necessarily describe soil moisture conditions, including when trail soils are near or at full saturation. See section 3.5.6.2.

Comment 8

Action: Consider Additional Information

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I request that the PNF research wet weather policies that are in effect at other R5 forests such as Stonyford in the Mendocino National Forest and Georgetown in the Eldorado National Forest. Typically these areas implement a wet weather closure after a certain amount of precipitation has been received in a 24 hour period. The closure remains in effect until no precipitation has been received in a 48 hour period. I realize that the lower elevation trails in the PNF in the French Creek area hold moisture longer than other areas of the forest and would support a longer drying out period such as 72 hours.

I have heard the argument of disseminating wet-weather closure information and enforcement and that the forest does not have the resources to address either issue. I have heard the argument of how do you get the information out to the public that the forest is under a wet-weather closure? What if someone drives three hours to visit the forest only to find out that it is closed? My suggestion is to implement such restrictions as the PNF implements its current restrictions. For sake of argument lets look at firerestrictions. When conditions are present that require the PNF to put into place fire restrictions such as a prohibition on campfires, or chainsaw use what does the forest do? They disseminate information via email, RSS feeds, website, and signage. When the conditions change to permit campfires again, the forest lifts the restriction. The wet weather closure dissemination can be similar.

I suggest a "wet weather" closure system that accounts for a specific amount of precipitation within a specified time period followed by a drying-out period, similar to the Rock Creek, Stonyford, and Upper Lake OHV areas. With the location of the Oroville Ranger Station, and its close proximity to the lower elevation trails in the PNF, it would provide the resource to effectively implement a "wet weather" closure system. The Oroville Ranger Station could

effectively communicate the status of the closure via telephone recording, website, signage, RSS feeds, and email distribution lists.

[Graphic:] Weather Record for the month of December 2008 taken from Lake Oroville, CA.
[Graphic:] Weather Record for the month of January 2009 taken from Lake Oroville, CA.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist. Precipitation data does not adequately describe saturation and soil moisture conditions so a closure based on rain gauge data alone would not accurately predict when travel on the trails would not produce soil and water impacts.

Comment 9

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Bias and Prejudice
It is my opinion that the DEIS has prejudged motorized recreation and has had in mind a predetermined outcome of closure prior to authoring the DEIS document. As a result, the DEIS takes an extremely biased view against motorized recreation, does not analyze the effects of motorized recreation objectively, and creates issues that do not exist. Out of 459 pages in the DEIS, there is not one single positive statement about motorized recreation. There is zero discussion of the legitimacy of a motorized form of recreation nor is there any discussion of the positive impact that OHV brings to the human environment. I live, eat, and breathe riding my motorcycle on single track trails. Other than family there is nothing more important to me. Yet after reading the DEIS I am worn out, reading page after page of how my form of recreation does not matter, wreaks havoc upon the environment, and conflicts with the majority of other forest users. The message from the DEIS is loud and clear: R5 has no desire to have me recreating on my motorcycle in the National Forest, that I am a menace, and that I need to be locked out of the Plumas National Forest.

Consider the following statement found in the background of the DEIS:

"Over the past few decades, the availability and capability of motor vehicles, particularly off-highway vehicles (OHVs) and sport utility vehicles has increased tremendously. Nationally, the number of OHV recreationists has climbed sevenfold in the past 30 years, from approximately 5 million in 1972 to 36 million in 2000. California is experiencing the highest level of OHV use of any state in the nation. There were 786,914 All Terrain Vehicles (ATVs) and OHV motorcycles registered in 2004, up 330 percent since 1980. Annual sales of ATVs and OHV motorcycles in California were the highest in the U.S. for the last 5 years. Four-wheel drive vehicle sales in California also increased by 1,500 percent to 3,046,866 from 1989 to 2002.

Unmanaged motor vehicle use, particularly OHV use, has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Compaction and erosion are the primary effects of motor vehicle use on soils. Riparian areas and aquatic dependent species are particularly vulnerable to damage from motor vehicle use. Unmanaged recreation, including impacts from OHVs, is one of "Four Key Threats Facing the Nation's Forests and Grasslands. (USDA Forest Service, June 2004)." (Public Motorized Travel Management DEIS, USDA Forest Service, PNF, 1, 2008)

This statement is boilerplate material and is biased against motorized recreation. In fact almost the entire text of the "background" is boilerplate material. If one was to compare the background in the PNF DEIS to the same chapter of the Tahoe National Forest DEIS for the same project, one would notice that the text matches nearly word for word. This would suggest that R5 is heavily involved in providing information to individual forests, putting "words in their mouth" so to speak, and is heavily influencing the process.

This is particularly disturbing when you consider the content that R5 is providing the PNF. Take for example the second paragraph of the section quoted above, which is heavily biased against OHV. If one were to remove bias, the statement would read something along the lines of this:

Many forms of unmanaged recreation (OHV, equestrian, mountain biking, hiking, fishing, hunting, rock hounding, mining, camping, etc.) has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Compaction and erosion are the primary effects of many forms of recreation on soils. Riparian areas and aquatic dependent species are particularly vulnerable to adverse impacts from many forms of recreation.

The last sentence in the cited paragraph supports my argument that it is unmanaged recreation, whether OHV or not, that is the identified threat to resources. Yet R5, with its agenda of closure to motorized recreation, has twisted the real threat and made this out to be a motorized only issue.

To support my claim of bias let's take a look at the references that the DEIS makes regarding the impact upon wildlife, specifically the California Red Legged Frog (CRLF). The DEIS makes it appear that motor vehicles are significantly impacting wildlife, yet provides no specific evidence of such. For example, the DEIS claims that motorized travel contributes to increased wildlife mortality due to collisions with the vehicle or that a frog will be crushed by a vehicles tires. But there is no evidence to support such claim. Not one case is cited that proves that a collision with wildlife has occurred. Yet I could testify under oath that I, who recreates in our National Forests on a motorcycle on average four times a month, have never had a collision with any form of wildlife other than an occasional insect such as a mosquito. I have never collided with, or crushed any deer, bear, rodent, amphibian, etc.

With regards to CRLF specifically, the DEIS makes it clear that the intent of prohibiting motorized travel on specific routes is due to extreme impact upon the frog and its environment. Yet the DEIS admits that no known populations of CRLF exist near said trails. The only know population is on private property and there are no trails proposed in that area. Yet OHV opportunity still suffers despite no know populations of CRLF near inventoried trails, because several trails are in the vicinity of critical aquatic refuges (CAR's). So let's address the critical aquatic refuges subject. The "Preferred Alternative" prohibits motorized travel on several trails due to CAR concerns. At first glance one would think that would be a reasonable approach. However, in reality this will do NOTHING to protect the CRLF, if they even exist, in that area. As it is stated in the DEIS, this process applies only to motorized travel, and other activities such as mountain biking, hiking, etc. is outside the scope of this process. Therefore, although the PNF might have good intentions, the result is that the CRLF will not be protected any more than it is now. The very trails that will be closed to motorized vehicles from this process will still be open and will be continued to be used by other human beings. These very trails will still be open to mountain bikes, equestrians, and hikers. The perceived threat to the CRLF will still exist! The tire footprint on a mountain bike is nearly identical to that of a motorcycle. The exact same threat of a frog being crushed by a tire is still present from a mountain bike tire. The threat of the frog being crushed by foot, whether horse or man, is still present.

I will give another example of just how biased and unreasonable this document is. As I mentioned in my opening letter, I also enjoy fly fishing in our National Forests. I, as most fisherman do, wade in the streams that we fish. Fishermen walk miles up and down streams and rivers in pursuit of fish. Fishermen kick up sediment and crush whatever may be beneath their boots. By the very nature of light refraction in water, it is extremely difficult to see more than a few feet deep of water and therefore it is difficult to see what one is stepping on. What do [you] think is a bigger threat to the CRLF? A motorized vehicle making a stream crossing on a trail that is less than 48 inches wide, perpendicular to the stream, and is located at a fixed position that will never move. Or an angler who is walking miles through a stream, taking thousands of steps within the stream at completely random locations, with no limitation on where he can step foot. I would suggest that if you calculated the surface area of a stream that is impacted by one angler during one day of fishing and compared it to the surface area of a stream that is impacted by all of the existing motorized trails in the PNF, you would find that one angler has a much larger impact upon the CRLF, and all aquatic wildlife for that matter, than all of the motorized trails that exist in the PNF today. At the end of the day, the "Preferred Alternative" does NOTHING to protect what it claims to protect. So why all the bias? Like I stated above, many Forest Service personnel, specifically in R5, has a prejudice view of motorized recreation. I would argue that very few if any PNF personnel, who are involved in this project, recreate primarily with an OHV. More specifically I would argue that even fewer ride motorcycles. If Forest Service personnel does not recreate with a motorized vehicle, one does not understand what they are tasked to manage. Personal prejudice is allowed to creep into the process and then bias is created to trump facts and reason.

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Let's discuss prejudice. For sake of argument, let's compare these two images:
[Photos of fly fisherman and ATV riding]
The first image is that of a solo angler, a fly fisherman to be precise. He is standing in a crystal clear stream wearing grey waders, sunglasses, and a fishing vest. He is surrounded by beautiful mountains, wildlife, and has just hooked a beautiful Cutthroat Trout. The second image is that of a solo motorcyclist. He is crossing a stream in about a foot of water on a vehicle with an exhaust pipe and is wearing a plastic chest protector, helmet, goggles, and tall boots. He too is surrounded by beautiful mountains, wildlife, and is negotiating an obstacle on his machine. How do you think the average public views each image? Which image portrays being "one with nature"? Which image is that of solitude? Someone unfamiliar with motorized recreation, as is the case with the general public and Forest Service personnel, would likely view the angler as being the "one with nature", and enjoying solitude. But this is where prejudice rears its ugly head. The truth is that neither image represents being "one with nature" more than the other; both images represent me. Whether fishing or riding my motorcycle, I am "one with nature". Often I ride my motorcycle alone, and I am enjoying solitude. I love the forest, I have a passion for being in the forest. That is why I visit the forest nearly every single week of the year. If I just wanted to ride my dirt bike I would ride my dirt bike at the motocross track. I have a motocross track 20 minutes from my house, yet I continually choose to drive four times that distance to visit the forest. If I just wanted to ride a motorcycle I would buy a street bike and ride from my house. But I don't, because I choose to be in the forest. In fact, I get to see more of the forest and enjoy more diversity of the forest by traveling by motorcycle instead of foot. It is a much more rewarding experience to me.

Now let's compare these two images and the perceived effect upon the environment. Which images portrays someone who appreciates nature more? Who is impacting the environment and wildlife less? Again, an ignorant person would think the answer to all those questions would be the angler. But you can't tell from a picture who

appreciates nature more. In fact, like I stated above, those images represent the same person; the same person who loves nature and has a passionate desire to be surrounded by its beauty. Who is impacting the environment and wildlife less? Again an ignorant person would believe the angler. However, it is very likely that the opposite is true. While the motorcyclist looks like a menace under all of his protective gear, one must get beyond perception and look objectively at the situation. Once again the motorcyclist is crossing the stream at a fixed location on a trail that runs perpendicular to
the stream, and his impact is only a couple of feet wide and never moves. The DEIS argues that sediment is introduced into the stream channel and that the effect is felt far downstream. However, there is no evidence or documentation at site specific crossings of the amount of sediment that is being introduced into stream channels. In fact there is not even a value in the DEIS that states what is an acceptable or unacceptable threshold with regards to sediment amount in streams. Only hypothetical assumptions that damage is occurring. If the PNF was truly taking an objective look at stream crossings, they would have measured the amount of sediment introduced into the stream channel at specific crossings. I have examined stream crossing on these trails and have observed that sediment that is
introduced into the stream will settle out of suspension within a few yards of the crossing and the stream again runs clear.

But when compared to the angler who has walked miles up and down the stream, he has been kicking up sediment for hours. When compared to the motorized trail crossing where the sediment has dropped out of suspension after a few yards and therefore only effecting a few yards of stream. The angler is kicking up sediment that is effecting miles of stream. While the motorized trail has the potential to crush an amphibian within a 48 inch wide area, the angler has unrestricted access to the stream and therefore has an infinite ability to crush an amphibian! Not only has the DEIS not objectively evaluated stream crossings, the assumptions that are made in the DEIS about the environmental damage that is occurring due to motorized recreation, completely ignores the effect that other so-called "green" recreational activities are having upon the environment as well.

While on the topic of sediment in streams. What do you suppose is the amount of sediment that is introduced into our streams after a winter storm event? I have fished our Northern California streams and rivers days after a winter storm; the rivers run brown with the runoff. The Yuba and Feather Rivers are completely brown for weeks after a storm event. Is this having a negative effect upon wildlife? I would argue that sediment introduced into streams from OHV has a negligible effect upon wildlife when compared to sediment introduced by normal natural events. I suggest the PNF undertake a study and determine the amount of sediment that is being introduced at specific motorized trail locations of concern and measure the amount of sediment. Compare these figures to the sediment from other recreational uses such as mountain bikes, equestrians, and hikers. Additionally, compare the figures to sediment from
natural storm events.

The Forest Service has regulations and policies to specify what criteria makes a trail suitable or not suitable as a motorized trail. I suggest that all trails, with regards to environmental impact, should be evaluated as a trail on its own merit, regardless of what type of use it receives. In other words, the trail should be evaluated as just a trail, whether it is a motorized trail or non-motorized trail. If the trail is unsuitable for motorized vehicles, regarding environmental impacts, then it should be unsuitable for all uses, mountain bikes and hikers alike. Anything less is discriminatory.

Although non-motorized trails are outside the scope of this process, prudence would dictate that if the PNF were to close a route in this process under the guise of protecting the environment and wildlife, they should, in a separate process, close these routes to all visitors alike. You see, all forms of recreation have some sort of impact upon the environment. Nearly every single action that mankind makes, takes its toll upon the natural environment, and to say that only "quiet recreation" is "eco-friendly" is complete nonsense. To close a route to a motorized vehicle without closing the route to all users demonstrates the prejudice and bias against motorized vehicles and proves my point.

Comment 11

Action: Monitoring, Inventories

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The most egregious occurrence with regards to this process and the CRLF [California Red Legged Frog] issue is the fact that no field trips were taken to determine if the CRLF existed near inventoried trails. For whatever reason, the PNF couldn't find the time or money to send specialists into the field to settle the CRLF issue. After four years of this process and the OHV community dedicating $12.8 million to fund this project in California alone, the PNF couldn't find two days and two nights to survey for frogs. The result is the likely closure of several world class single track motorcycle trails. The Forest Service is entrusted by the public to manage our land in a responsible and ethical manner. By not committing to this process 100%, and doing an incomplete job, while taking our money, is nothing short of negligence.

Response

The Forest has completed USFWS California red-legged frog site assessments throughout the Jack's CAR in the French Creek Watershed where a known breeding population of CRLF are known to exist. A three year telemetry study (T. Tatarian, 2007) on this known breeding population was completed in 2007. The Forest Service has agreed (with the USFWS) to survey to USFWS protocol; all habitat identified as suitable within the Jack's Critical Aquatic

Refuges (CAR's) that could be affected by a proposed OHV trail within the selected alternative. In addition the Forest has agreed to survey to USFWS protocol; all habitat that is deteremined to be suitable (again that could be affected by a proposed OHV trail) that has not been previously surveyed through the HFQLGFRA amphibian contracted surveys.

In addition, there are Appendices in the Biological Assessment and Evaluation that identifies all routes with amphibian surveys and those without amphibian surveys for the preferred alternative (alternative 5). All data that showed occupied amphibian habitat, and suitable amphibian habitat was used to determine effects. The funding was not available to complete new amphibian surveys across the forest to protocol. The CRLF surveys are very expensive, requiring six visits (4 nocturnal, 2 day time) to complete the survey to protocol across the forest at 4,500' and below. The Forest is currently in formal consultation with USFWS because the all action alternatives did not meet the 6 criteria developed in a MOU (Oct, 2006) at the Regional level (as identified in Chapt. 3 of DEIS pg. 109), to determine no effect to the CRLF.

According to USFWS protocol, CRLF surveys must be done every 2 years to be valid. Occupancy is presumed in all unsurveyed suitable habitat for the CRLF.

In general, the initial "water" resource "call" to include or not include a route was first made by the hydrologist with data from the hydrological surveys. The Forest surveyed 410 miles of unauthorized routes by hydrological surveys (these field surveys were completed on all routes in action alternatives (alts 2,4 &5). Any determination to not include a route in a specific alternative was made route by route with all available information including working very closely with the hydrologists and site specific information, and made the first call of effect to aquatic habitat. Then this information with the site assessments conducted for the CRLF to determine if either the route had little to no impact (low), or could be mitigated (moderate to high), or had to be re-located (extreme). These were identified in Table 1 and Appendix A of DEIS and FEIS.

I don't believe that any world class trails were closed due to the CRLF or suitable habitat. Many routes will have to be mitigated prior to opening, but in general trails were closed due to egregious effects to water and soil resources and for those trails that had to be relocated and surveys were not completed to go forward with the relocation at this time. There is the opportunity in the future, when the district completes a roads analysis for identified subsheds that a route can be relocated to prevent adverse soil and water effects and analyzed to be designated to Plumas OHV system.

Comment 12

Action: Monitoring, Inventories

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that the EIS either be amended, or a supplemental EIS be drafted in accordance with 40CFR1502.9(c) (1), to produce a DEIS that has removed all bias and prejudice against motorized recreation, that provides an Alternative that acknowledges, protects, and provides access to all existing routes to include all of the unique, challenging, and world-class single track motorcycle trails that currently exist in the Plumas National Forest.

Comment 13

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Term "Unauthorized"

I am very concerned over the monumental use of the term "unauthorized".

For example, take the following from page two of the background in the DEIS:

"On National Forest System (NFS) lands managed as open to cross-country motor vehicle travel, unrestricted, repeated motor vehicle travel has resulted in unplanned, unauthorized routes and areas (roads, trails and areas). These routes were developed without agency authorization, environmental analysis or public involvement, and do not have the same status as NFTS roads and NFTS trails. Nevertheless, some unauthorized routes may be well sited, provide excellent recreation opportunities for motorized and non-motorized recreationists, and may enhance the NFTS. Other unauthorized routes are poorly sited and cause unacceptable environmental impacts. Only NFTS roads, NFTS trails and discrete, specifically delineated areas can be designated for motor vehicle use. In order for an unauthorized route to be designated, it must first be added to the NFTS. In order for areas to be designated for motor vehicle travel, a discrete, specifically delineated space that is smaller, and in most cases much smaller, than a Ranger District must be identified."

This statement is misleading, as are other similar statements within the DEIS.

The PNF, until recently has been an "open forest". Motorized travel on all routes, whether NFTS or not, unless expressly prohibited, has been legal. By the very nature of managing an "open forest", the forest service has authorized travel on non-NFTS roads and trails. The term "unauthorized" has the connotation as being illegal.

The Forest Service once called these "unauthorized" routes "unclassified". The sudden change of terminology to "unauthorized" is intentional. With the illegal connotation and its use in 190 pages of the DEIS, often used several times in a page, the Forest Service is trying to paint a picture of unlawful behavior amongst motorized users, despite the fact that travel off NFTS routes has been 100% legal and authorized by the PNF.

I suggest changing the term "unauthorized" back to a more appropriate term "unclassified".

Response

The Washington Office has determined that a road or trail is either an authorized or unauthorized road or trail. Following that direction, all the routes we are dealing with are considered unauthorized because they are not a system road or trail or they are not authorized by permit or special use.

Comment 14

Action: Decisionmaking Philosophy

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Predetermined Outcome of Closure

It is my opinion that the authors of the DEIS, under direction from R5, has had a predetermined outcome of closure in mind prior to authoring the DEIS document.

Consider this example, from the "Significant Issues" in the PNF DEIS:

"Issue 1: The proposed action unreasonably restricts motorized recreation use by prohibiting cross-country travel and restricting use to designated routes. The addition of only 364 miles of NFS motorized trails to the NFTS provides insufficient public access to PNF NFS lands and unfairly limits motorized recreation.
Discussion: Concerns were raised that restricting cross-country travel across the entire Forest by restricting use to designated routes severely impacts motorized recreation opportunities and unfairly restricts access for hunting, fishing, camping and a host of other outdoor activities. The route inventory identified 1,109 miles of unauthorized routes being used and the proposed action only retains 364 miles of these. This is insufficient to maintain a quality motorized recreation experience on the PNF.
Issue 2: The proposed addition of motorized trails to proposed citizen inventoried roadless areas (CIRAs) will adversely affect the roadless characteristics of these areas including opportunities for solitude, undisturbed landscapes and primitive, non-motorized recreation.
Discussion: Concerns were raised that adding motorized trails CIRAs on the Plumas National Forest would reduce opportunities for solitude, and primitive non-motorized experiences would be ruined by the noise and disturbance of vehicles. Motorized trails would change the character of these areas.
Issue 3: Many of the motorized trails proposed for addition to the NFTS are poorly located and will cause adverse impacts to plants, wildlife, water quality, soils and other natural resources.
Discussion: Many commenters expressed concerns about impacts to a variety of natural resources, citing stream crossings, habitat fragmentation, wildlife disturbance, sedimentation, cultural resources, invasive weeds and other resources that would be impacted by motorized use of roads and trails added to the NFTS." (Public Motorized Travel Management DEIS, USDA Forest Service, PNF, 8, 2008)

Compare the text above to the following text from the Tahoe National Forest Motorized Travel Management DEIS, Vol. II, Page 9:

1. Issue: The proposed action unreasonably restricts motorized recreation use by prohibiting cross country travel. The addition of only 54 miles of motorized trails to the NFTS provides insufficient public access to TNF lands and unfairly limits motorized recreation.
Discussion: Concerns were raised that restricting cross country travel across the entire forest severely impacts motorized recreation opportunities and unfairly restricts access for hunting, fishing camping and a host of other outdoor activities. The route inventory identified 1,400 miles of existing motorized trails un-authorized for motorized use: the proposed action only retains 54 miles of these. This is insufficient to maintain a quality motorized recreation experience on the TNF.
2. Issue: The proposed addition of motorized trails to inventoried roadless areas will adversely affect roadless characteristics of these areas including opportunities for solitude, undisturbed landscapes and primitive, non-motorized recreation.
Discussion: Concerns were raised that inventoried roadless areas on the TNF are already impacted by NFS roads and trails that detract from their roadless character. The proposed action only compounds this problem by adding 6 miles of additional motorized trails in these pristine areas. Opportunities for solitude and primitive non-motorized experiences will be ruined by the noise and disturbance of OHVs. Motorized trails change the character of these otherwise undisturbed landscapes.
3. Issue: Many of the motorized trails proposed for addition to the NFTS are poorly located and will cause adverse impacts to plants, wildlife, water quality, soils and other natural resources.

Discussion: Many commenters expressed concerns about impacts to a variety of natural resources, citing stream crossings, habitat fragmentation, wildlife disturbance, sedimentation, cultural resources, invasive weeds and other resources that would be impacted by motorized use or roads and trails."

Both sets of text are nearly identical, word for word, as this is boilerplate material. Yet the DEIS leads the reader to believe that these issues were formulated by comments received from the public, other agencies, and the Washoe Tribe. There is little doubt that comments received from the public, other agencies, and other interested parties would be similar to each other, especially in forests that have close proximity to each other. It is likely that the same individuals who commented to the Tahoe National Forest made comments to the Plumas National Forest. Therefore, it is likely that significant issues would be similar between the two forests. However, it is unlikely that the PNF would author text nearly identical, in fact word for word to the Tahoe National Forest unless the PNF was receiving direction from somewhere else, likely R5. Therefore, it is impossible to determine if the significant issues raised in this DEIS are actually drafted in response to comments received from the public specific to the PNF.

This boilerplate text leads to my concern that the PNF and this process is being heavily influenced by individuals outside of the PNF. It is clear in the Travel Management Rule that the decision of designation of roads and trails is to be made at the local level; the individual who makes the decision which Alternative is to be selected and who signs the Record of Decision is the Forest Supervisor. However, with the evidence above, it appears to an outsider that this process is being heavily influenced by individuals outside of the local level and is not the intent of the Travel Management Rule.

This is where the problem lies. R5 is driving its agenda of closure of user created routes by providing boilerplate text to its forest. One needs to go no further than page 5 of the DEIS to see where R5's influence comes into play:

"There is a need for limited changes to the Plumas NFTS to:
Provide motor vehicle access to dispersed recreation opportunities (camping, hunting, fishing, hiking, horseback riding, etc.). A substantial portion of known dispersed recreation activities are not typically located directly adjacent to existing NFTS roads or NFTS motorized trails. Some dispersed recreation activities depend on foot or horseback access, and some depend on motor vehicle access. Those activities accessed by motor vehicles are typically accessed by short spurs that have been created primarily by the passage of motor vehicles. Many such unauthorized "user-created" routes are not currently part of the NFTS. Without adding them to the NFTS and designating them on a MVUM, the regulatory changes noted above would make continued use of such routes illegal and would preclude public access to many dispersed recreation activities."

The "need to make limited changes to the Plumas NFTS" forces this process into a predetermined outcome as I will describe below.

Outlined in the DEIS, the "Preferred Alternative" as intended in the Travel Management Rule, prohibits cross-country travel but at the same time prohibits motorized travel on existing routes that have a long history of motorized use and a history of long-term sustainability. The PNF prior to the Travel Management Rule had been an "open forest". Although labeled by the Forest Service as "unauthorized", use of motorized vehicles on routes other than NFS roads and trails is legal in an open forest. Motorized vehicles on the PNF have historically and legally operated on a combination of NFTS and "unauthorized" roads and trails totaling approximately 5369 miles; of those, approximately 1109 miles are classified as "unauthorized". (Public Motorized Travel Management DEIS, USDA Forest Service, PNF, 2 & 6, 2008) These "unauthorized" routes account for 21% of all the existing routes that have been historically and legally used by motorized vehicles in the PNF. The "Preferred Alternative" proposes to add only 250 miles of motorized routes while disproportionately prohibiting motorized travel on approximately 859 miles of routes. (Public Motorized Travel Management DEIS, USDA Forest Service, PNF, 25, 2008) To allow the continued motorized recreation on routes historically used by OHV, the PNF would have to make numerous (as opposed to limited) motorized trail additions to the existing NFTS.

The "Preferred Alternative", by making limited additions to the NFTS and prohibiting motorized travel on approximately 859 miles of routes historically used by motorized vehicles, is excessive, unreasonable, and not aligned with original intent of the Travel Management Rule.

The "Preferred Alternative" is even more excessive and severe when analyzing trails "Open to Motorcycle Only". While 225 miles of "unauthorized" trails suitable for motorcycles only has been inventoried, the "Preferred Alternative" proposed to add only 51 miles. This is a reduction of nearly 77% of trails that have been historically and legally used by motorcycles!

The "Preferred Alternative" is severely limiting motorized recreation and specifically motorcycle recreation in the PNF.

If the PNF wish to NOT severely limit motorized recreation, the PNF would have to make numerous as opposed to limited changes to the NFTS.

I request that the EIS either be amended, or a supplemental EIS be drafted in accordance with 40CFR1502.9(c)(1), to produce a DEIS that has removed all bias to drive toward a predetermine outcome of closure and provide an Alternative that acknowledges, protects, and provides access to all existing routes to include all of the unique, challenging, and world-class single track motorcycle trails that currently exist in the Plumas National Forest.

Comment 15

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Alternatives
From page 26 of the DEIS:
"Alternative 5 responds to the issue of access and motorized recreation opportunity. During scoping the Plumas National Forest received suggestions for additional routes and alternative routes that would better provide access and motorized recreation opportunity."

This is nothing short of misleading. Alternative 5 does not respond to the issue of access and motorized recreation opportunity. An Alternative that responds to the issue of access and motorized recreation opportunity would include ALL of the inventoried routes that exist on the forest floor right now.

Comment 16

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

The "Preferred Alternative" is lacking several critical "unauthorized" routes that provide connectivity and loop opportunities that would significantly enhance recreational value and in some cases enhance public safety. These critical routes have been omitted from the "Preferred Alternative" despite their historic use and evidence of long-term sustainability. Many of these "unauthorized" routes possess less impact to resources than their NFTS counterparts despite what is claimed in the DEIS.

Trails 6M04 and 6M10 are just two examples of trails that have had years of motorized use and have been maintained by the public. It appears that the PNF has taken a prejudice view of "Double Black Diamond" difficulty single track trails and has declined to objectively evaluate them; citing Forest Service personnel opinion and estimated guesses, instead of accurate site-specific scientific analysis, that these trails fail to meet the criteria listed 36CFR212.55.

Response

6M04 needs to be relocated requiring new construction which is outside the scope of this project. 6M10 was not included because it is in the Jacks Critical Aquatic Refuge.

Comment 17

Action: Alternatives General (add, change, delete)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Accuracy of the DEIS
I am doubting the accuracy of the analysis in the DEIS to support that excessive resource damage is occurring. Allow me to take two trails as examples: 6M04 and 6M10. Both 6M04 and 6M10 have been rated "extreme" in the watershed category. What makes a route rated extreme?

The Soils and Water Resource Report Appendix F for 6M04 has this in the comments:

"Starting 22N79Y. Approx. 100' trail follows creek. Trail is very entrenched 1' + for about 1/2 mile to first perennial stream crossing. In this section there are failed waterbars, multiple constructed trails. Trail is on an ephemeral and perennial crossing and there is sediment to channel. Mitigations would be major relocation outside the scope of this project. After the multiple perennial stream crossings the rest of trail is in good shape and would be a medium."

This is where the problem develops. This statement has five inaccuracies:
• The trail is NOT entrenched for 1/2 mile. The trail is entrenched for .08 miles. A major discrepancy. See GPS track below. 6M04 is the black trail, the entrenched section is highlighted in red.
• There are zero waterbars on the trail, so it is impossible to have failed waterbars.
• The trail in this location is not on an ephemeral stream.
• Sediment is not running into the perennial stream. If the individual doing the analysis had looked closely at the entrenched section, the individual would have seen that the dirt from the trench was deposited right next to the trail, on the banks of the rut. When motorcycle tires are allowed to spin the dirt is thrown a couple of feet into the air. The dirt falls next to the trail. The evidence is that the banks of the rut are higher than the surrounding grade.
• Mitigations would not be major. A small realignment of the trail would get the trail off of the perennial stream.
[Graphic:] Map depicting 6M04

Comment 18

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The Soils and Water Resource Report Appendix F for 6M10 has this in the comments:

"S end drop within drainage, crossing drainage many times, hard to follow surveys not completed on this portion."

This statement has two inaccuracies and an astonishing admission:
• The trail does NOT drop within the Fox Creek drainage.
• The trail does NOT cross the Fox Creek drainage several times.
• The DEIS admits that the trail survey was not completed because the trail was hard to follow.

How can one make a determination of closure if one has not survey the entire trail? In fact I am unsure if the correct trail was even surveyed at all.

Response

This trail was surveyed in March 2009 and determined to have Moderate watershed mitigations but was not included because it is in the Jacks Critical Aquatic Refuge..

Comment 19

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Compare these two maps, one is the DEIS map and the other is my personal topographical map with an accurate GPS track:
[Graphic:] PNF DEIS map depicting 6M10 and 6M47
[Graphic:] Topographical map depicting accurate GPS tracks of 6M10 and 6M47.

6M10 is depicted in the DEIS maps as one trail. In reality 6M10 is actually two separate trails and is accurately depicted in the topographical map above with separate colors to help clarify. The northern half of 6M10 and 6M47 is actually one trail and is depicted correctly on the topographic map above. By comparing the two maps we can see at least three errors with these two trails:

• The location and depiction of the southern half of 6M10 in the DEIS is significantly different than the topographical map. It is obvious on the topographical map that 6M10 does not cross the Fox Creek drainage despite what the DEIS claims. If you compare the tracks of the DEIS to the tracks of the topographical map they don't even match up. It is obvious that the wrong trail was surveyed.
• A short section connecting 6M10 and 6M47 is missing from the DEIS maps.
• 6M47 in the DEIS connects to NFTS Road 23N15B. However, the actual condition on the ground is that it actually connects to NFTS Road 23N15C as depicted in the topographical map.

So after reviewing just three trails (6M04, 6M10, and 6M47), I have pointed out three map errors and eight inaccurate statements made in the DEIS. I have not had the time in this short comment period to analyze every trail in the DEIS for accuracy. But what little research I have done has discovered nothing but errors and inaccuracies in the DEIS. It makes me suspect of the accuracy of the entire document.

Comment 20

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Consequences of Failing to Satisfy User Demand
By omitting expert motorcycle trails such as 5M21, 5M27, 6M04, 6M10, 6M12, 6M13, 6M20E, 6M26, and 6M27, the "Preferred Alternative" has few trail that tests the skill and ability of the advanced and expert motorcycle rider. The

Forest Service recognizes that including highly desirable trails, even though a higher degree of monitoring or maintenance might be required, will be beneficial over time.

"Weigh the benefits of providing high quality sustainable access and recreation opportunities against resource and use conflicts, as well as unit budgets and costs of maintaining systems. Ideally, motor vehicle use systems should consist primarily of roads, trails, and areas with little or no need for mitigation of conflicts or resource impacts. However, they may include some segments that require higher levels of mitigation or conflict resolution. Loops and features that enhance and provide high quality road and trail experiences are important elements of good recreational motor vehicle use systems, and are needed to help keep people and their vehicles on roads and trails." (Route Designation Guidebook, USDA Forest Service, 28-29, 2006)

5M21, 5M27, 6M04, 6M10, 6M12, 6M13, 6M20E, 6M26, and 6M27 provide challenging trails for the advanced and expert motorcycle riders. Adding these trails to the NFTS would satisfy those riders desire to test their skills on trails that already exist on the ground. I fear that if these trails are not designated that riders might be tempted to test their skills on other areas of the PNF which might result in negative impacts to resources.

Response

Most routes with an extreme rating will require new trail construction that is not part of this effort. With future projects, those reroutes and new construction could be proposed and the route brought in the Plumas National Forest trail system

Comment 21

Action: Alternatives General (add, change, delete)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternatives Eliminated from Detailed Study

The DEIS, on page 27, takes this position on why the authors have choose not to provide an Alternative that depicts all of the inventoried routes:

"A total of 1,109 miles of routes were inventoried and considered for inclusion into the NFTS. This alternative was eliminated from detailed study for the following reasons. It included several short routes that would not benefit the trail system. It included some routes that had multiple resource issues. It also included some routes that the public was not interested in designating."

How do the authors know that a route will not benefit the trail system, or that the public was not interested in designating? Obviously the fact that these routes show signs of motorized use means that they are being used by motorized vehicles. The simple fact that they are being used by motorized vehicles is evidence that there is a need for the route and a desire to use it.

Comment 22

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Game of Semantics
Alternative 5 proposes to close 21% of existing routes that are in use today. Even more stunning is that Alternative 5 proposes to close 77% of motorcycle only trails. To call Alternative 5 the "Improved Access and Motorized Recreation Opportunities" alternative is grossly misleading. The result is that someone unfamiliar with the PNF is led to believe that the PNF is proposing to adopt the Alternative that is the most suitable for OHV and is likely to support such decision, when in reality the PNF is proposing an Alternative of closure. Because of these semantics, the anti-access community believes that the PNF is pandering to the OHV community when in reality the opposite has occurred.

Alternative 3 and its Citizen Inventoried Roadless Areas proposes zero additions to the NFTS. I would think that the Motorized Recreation Opportunity Alternative would be at the opposite end of the spectrum and would include all of the inventoried routes. In fact there is no Alternative that accurately represents all of the current routes that are legally being used today. Alternative 1 is a poor representation of the baseline condition despite what the DEIS states.
I understand the reason for Alternative 1 and its requirement by NEPA. I also understand that Alternative 1 is technically correct to count only NFTS routes towards milage totals in its text and tables. However, this is where the problem is. Although user created routes are depicted on the maps of Alternative 1, these routes are left out of the tables and text of the DEIS. The result is that the milage of user created routes is never fairly recognized. If user created milage had been recognized, said milage would be depicted on a chart alongside the other Alternatives instead of in tiny footnotes below such charts.

Allow me to use Table 8 of the DEIS:
[Table:] Mileage by vehicle type for each action alternative.

If there were a true OHV access Alternative, one that accurately depicted all of the existing routes, it would be included in this chart. For arguments sake I will call this new Alternative, Alternative 6. Alternative 6 would be next to Alternative 5 on this charts and in the row "Motorcycle Trails" is would have the number 225. In the row "Reduction from Existing Inventoried Routes" it would have a zero. This would allow a much more objective comparison to what is actually on the ground right now.

Comment 23

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Open to Highway Vehicles Only
The "Preferred Alternative" is reasonable with regards to the amount of NFS Roads designated as "Open to Highway Legal Vehicles Only". But I would like to offer a few suggestions of short segments to be designated as "mixed use". These suggestions can be found in my comments titled "Route Specific Comments" beginning on page 38.

I would like to point out that many users prefer motorcycles that are not highway legal and in some cases a highway legal motorcycle is not practical for certain trail conditions. Many advanced motorcycle riders prefer to ride two-stroke motorcycles. These two-stroke motorcycles which are not highway legal are typically 40-50 lbs lighter than a "dual sport" motorcycle. The effect of a light motorcycle is a vehicle that is much more maneuverable, can navigate trail obstacles better, is less fatiguing, and overall results in a much more enjoyable ride and experience. These lighter motorcycles have a much tighter turning radius than "dual sports" and can negotiate tight switchbacks more effectively. For these reasons it is impractical to ride a heavy "dual sport" motorcycle on many of the tight single track trails that the PNF is famous for.

Comment 24

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Over-regulation
The "Preferred Alternative" proposes an irrational number of route closures and over-regulates OHV users. By prohibiting motorized travel on historic trails, that in reality contributes little or no negative impact to resources, and by prohibiting motorized travel on trails that provide a challenging trail experience for the advanced and expert users, the "Preferred Alternative" contradicts Forest Service policy regarding recreational use.

"Regulate uses to the extent necessary to provide for user and public safety; to protect natural, cultural, and historical resources; to minimize conflict and maximize responsible use; to achieve recreation experience objectives; and to comply with Federal and State laws." (Forest Service Manual, USDA Forest Service, 2350.3(5), 2008)

Comment 25

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Seasonal Restrictions

The "Preferred Alternative" with its proposal of seasonal restrictions is unreasonable and does not take into account variable weather patterns to include abnormally wet or dry winters. There is no scientific or historical data regarding rainfall or snowpack upon the PNF within the DEIS to support a seasonal closure. If such data existed, I would suggest that it is likely that evidence would show that there were periods of dry weather, suitable for OHV recreation, that would have fallen within the seasonal closure dates; especially at the lower elevations. I rode in the PNF for the first two weeks of December 2008, twoweeks in January 2009, and as recently as the second week in March 2009, all within large periods of dry weather. Please review my comments titled "Seasonal Closure" for a detailed discussion.

I suggest either amending the "Preferred Alternative" or publishing a supplemental EIS to:

a) Include those trails site specifically requested by the public as motorized trail additions to the NFTS.
b) Designate NFS roads that would link OHV trail segments as "Open to All Vehicles" or "Mixed Use".
c) Rid the DEIS of seasonal restrictions and replace with a precipitation based system monitoring system.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. The mitigation is supported by monthly precipitation data collected by California Department of Water Resources between 1996 and 2008 recorded at the Brush Creek rain gauge. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist.

Comment 26

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.6.2 and Appendix C of the Soil and Water Resource Report

Many of the comments made by Forest Service personnel in the Soils and Water Resource Report Appendix F relate to rutting greater than two inches. I am not sure where this two inch threshold has come from, but it is clear that the PNF does not have any concept of the condition of acceptable OHV trails at so called "managed" areas. If the PNF were educated on the condition of NFTS trails that exist in other R5 forests, I would argue that the PNF has some of the best trail conditions in the State. The following are some pictorial examples of NFTS trails located within R5. Let the evidence show that a two inch rut threshold is unreasonable and not consistent with other trail systems in the State.

[Photo:] NFTS Trail in the Mendocino National Forest Stonyford Area. Rutting greater than 2". This trail is nearly 4 feet below grade. The trails condition is the result of poor design (nooutslope, improper use of water bar, and improper use of the trail tractor.
[Photo:] NFTS Trails in the Mendocino National Forest Upper Lake Area. Rutting greater than 2".
[Photos:] Both these trails are NFTS trails in te Mendocino NF Upper Lake Area.

I hope I have made my point. To illustrate how unreasonable the two inch rut threshold is, you could probably add up the cubic inches of soil loss from all of the ruts on all of the single track trails in the Plumas National Forest and you probably won't equal the soil loss of the trail depicted in the first photo; a single NFTS trail located in the Mendocino National Forest. To further put it in perspective, all of the trails in the above photos are Forest Service maintained routes at so called "managed OHV areas". This is how the Forest Service maintains routes in areas other than the Plumas.

Response

See section 3.5.3.1. The field survey methodology for this project stems from the USFS Pacific Southwest Region's "Best Management Practices Evaluation Program (BMPEP)". See the field survey form in Appendix C of the Soil and Water Resource Report. The protocol for the BMPEP defines a rill as being greater than 2" deep and notes such rills as an indication of unsatisfactory travel surface drainage. However, the presence of such rills, alone, would not cause an evaluated route segment to "fail" and would not necessarily result in a rating of adverse effect. See the scoring rule set in Appendix C and section 3.5.6.2. Trails are typically rated with adverse soil and water effects because of delivery of route-generated sediment to stream channels or because the route has captured a stream channel. The observation of rills was used only as an indication of the adequacy of route surface drainage.

Comment 27

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Numerous comments in Appendix F make reference to irreparable segments of trail and therefore give the trail a rating of "extreme". Most areas can be mitigated with minor reroutes and trail reconstruction. I question how much effort the trail analyst put into finding a possible solution to the problem. I know these trails very well. There is not a problem area that cannot be overcome with a bit of labor and a desire to repair the trail. I feel that a contributing factor to the large amount of "extreme" trails is that there is no incentive for Forest Service personnel to find a

suitable solution. It is much easier to just write the trail off and close it. However, to the enthusiast, who's life long passion is to ride these types of trails, the enthusiast has all the motivation in the world to find a solution to mitigate these trails. The PNF is going to rely on volunteer labor to mitigate problem areas and therefore the PNF needs the user to support their plan and mitigation projects. If the users see a good faith effort being put forth by the PNF, where the forest meets us halfway by designating all of our single track trail, the PNF will essentially guarantee the
users help in mitigating the problem areas. On the other hand, if the PNF continues down the track they have begun, and only designates a shell of the trail system, you will not get support from the users. I can guarantee that you will have a bigger problem on your hands if you don't have the support from the user community.

Response

Section 3.5.3.1 has been clarified, stating that substantial relocation of a proposed trail is typically not a mitigation available for this FEIS because the new trail location usually would involve ground outside the geographic area surveyed and analyzed by PNF specialists. Relocation outside of this geographic area would require further analysis under a future NEPA process.

Comment 28

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

4M01
I support the addition of 4M01 to the NFTS.
Included in Alternative 2 and 5.
Appendix F comments with regards to rutting and stream crossing are unreasonable when compared to other R5 forests.

Comment 29

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

4M02
I support the addition of 4M02 to the NFTS. Included in Alternative 2. This trail was not completely surveyed despite the fact that OHV dedicated $12.8 million dollars to this project. I suggest 4M02 be added to the "Preferred Alternative".

Comment 30

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M01
I support the addition of 5M01 to the NFTS.

Included in Alternative 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. A June 1st opening is also unreasonable because by that time of year it will be 90 degrees outside and dusty. Please refer to my comments titled "Seasonal Closure" for detailed comments. Forest Service Manual 7716.12(2) gives guidance that seasonal designation should be similar to nearby routes.

"To the extent practicable, use standard seasonal designations and limit their number. Employ the same seasonal designation for nearby designated roads, trails, and areas."

I suggest 5M01 be eliminated from seasonal use restrictions.

Comment 31

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M02
I support the addition of 5M02 to the NFTS.

Included in Alternative 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M02 be eliminated from seasonal use restrictions.

Comment 32

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M04
I support the addition of 5M04 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

5M04 is depicted in the DEIS as one trail. The actual condition on the ground is two trails. The trail is bisected by NFS Road 22N83. The trail in blue is called Squirrel Hunter. The trail in black is The Old Chute Trail. Please refer to the following topographical map for clarification.

[Graphic:] Topographical map depicting 5M04 as two separate trails.

I suggest 5M04 be eliminated from seasonal use restrictions. I suggest 5M02 be depicted as two separate trails.

Comment 33

Action: Multiple Use Emphasis

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M05
I support the addition of 5M05 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M05 be eliminated from seasonal use restrictions.

Comment 34

Action: Multiple Use Emphasis

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M07

I support the addition of 5M07 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

The Appendix F comments regarding rutting and stream crossing is unreasonable as the approach to the stream is a shallow approach and hardened by rock.

I suggest 5M07 be eliminated from seasonal use restrictions. I suggest a reevaluation and/or field trip to discuss the merits of the requirement for a bridge as a mitigation requirement.

Comment 35

Action: Multiple Use Emphasis

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M08

I support the addition of 5M08 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M08 be eliminated from seasonal use restrictions.

Comment 36

Action: Multiple Use Emphasis

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M09

I support the addition of 5M09 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M09 be eliminated from seasonal use restrictions.

Comment 37

Action: Multiple Use Emphasis

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M10

I support the addition of 5M10 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M10 be eliminated from seasonal use restrictions.

Comment 38

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M11

I support the addition of 5M11 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

The road that 5M11 connects to is missing from the DEIS maps. The road is NFS Road 23N00C. Please see the topographical map below for clarification.

I suggest 5M11 be eliminated from seasonal use restrictions. I suggest NFS Road 23N00C be added.

[Graphic:] Topographical map depicting 5M11 and the missing NFS Road 23N00C

Comment 39

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M12

I support the addition of 5M12 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M12 be eliminated from seasonal use restrictions.

Comment 40

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M13

I support the addition of 5M13 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M13 be eliminated from seasonal use restrictions.

Comment 41

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M15

I support the addition of 5M15 to the NFTS.

Included in Alternative 2.

This trail was not completely surveyed despite the fact that OHV dedicated $12.8 million dollars to this project. I suggest 5M15 be added to the "Preferred Alternative".

5M15 provides vital connectivity to NFS Road 23N63Y.

Comment 42

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M17

I support the addition of 5M17 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

5M17 is critical to keep OHV traffic off of Plains Road.

I suggest 5M17 be eliminated from seasonal use restrictions.

Comment 43

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M19

I support the addition of 5M19 to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards to rutting is unreasonable when compared to other R5 forests.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M19 be eliminated from seasonal use restrictions.

Comment 44

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M20

I support the addition of 5M20 to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards to rutting and stream crossing are unreasonable when compared to other R5 forests.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M20 be eliminated from seasonal use restrictions.

Comment 45

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M21, 5M22, 5M23

I support the addition of 5M21, 5M22, and 5M23 to the NFTS.

Included in Alternative 2.

5M21, 5M22, and 5M23 are really the same trail.

This trail is one of the most challenging and rewarding trails in the PNF. This trail is truly an expert only trail and is one of the most important trails for that very reason. Much of the trail is on granite and provides for a unique riding experience.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

The author of the comments in Appendix F states that there are very steep entries and exits to stream crossings and the major relocation is required. I disagree that major relocation is required. Bridges can be constructed where necessary.

I suggest 5M21, 5M22, and 5M23 be eliminated from seasonal use restrictions. I suggest a reevaluation and/or field trip to discuss mitigation requirements. In the meantime, I request that 5M21 be added to the "Preferred Alternative" with an asterisk. Once again, a world class trail. It would be a shame to lose.

Comment 46

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M24

I support the addition of 5M24 to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards to rutting and stream crossing are unreasonable when compared to other R5 forests.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M24 be eliminated from seasonal use restrictions.

Comment 47

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M25

I support the addition of 5M25 to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards to rutting and stream crossing are unreasonable when compared to other R5 forests.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M25 be eliminated from seasonal use restrictions.

Comment 48

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M26

I support the addition of 5M26 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M26 be eliminated from seasonal use restrictions.

Comment 49

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

5M27

I support the addition of 5M27 to the NFTS.

Included in Alternatives 2 and 5.

This is a perfect example of how arbitrary and subjective this process is. The entire OHV community is subject to Forest Service personnel whim. The following are the comments from Appendix F:

"Trail is entrenched, steep, and has rutting greater than 2". There are 5 ephemeral and 1 perennial stream crossing all with sediment to channel. Mitigations for this trail would include major relocation that is outside the scope of this project. In addition to the soil/water concerns the trail leads to private land and continues through it. Relocation would be needed to keep trail off private land."

The E08 rating is 27% fail and the trail gets an extreme rating for watershed.

Now compare to Appendix F comments for trail 5M25:

"This trail is entrenched and is rutting with some trail sections with ruts greater than 2" on steep slopes. There are 11 ephemeral and 1 intermittent stream crossing. Two of the ephemeral channels and the intermittent have

sediment to stream and the other 9 ephemeral channels have sediment deposition in the stream habitat protection areas. Waterbars, dips, switchbacks, and/or minor relocations are need as mitigations."

The E08 rating of 5M25 is 40% fail and the trail gets a high rating for watershed.

5M25 has more stream crossings and a larger percentage of trail that has a fail grade than 5M27, yet 5M25 is included in the "Preferred Alternative", while 5M27 is not. Who is the PNF personnel that has determined that 5M27 "needs major relocation that is outside the scope of this project?" A summer intern? A forest hydrologist? A road/trail engineer? I would argue that there is a solution to mitigate every problem area on every trail in the PNF; one just has to have the desire fix it.

Has the PNF made any attempt to contact the private land owner regarding an easement?

There is no predictable pattern for what gets a high rating or extreme rating when it comes to the watershed category. It appears totally arbitrary. It is nearly impossible to make substantive comments when I have arbitrary, unreasonable, and contradicting information to work with.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 5M27 be eliminated from seasonal use restrictions. I suggest the entire trail system in the Plumas National Forest be reevaluated in the watershed category because of the arbitrary and non-objective evaluation of these trails.

Comment 50

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M02

I support the addition of 6M02 to the NFTS.

Included in Alternatives 2 and 5.

I agree that some mitigation will be necessary. With a minor reroute to build a switchback or two this trail will be easy to mitigate.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M02 be eliminated from seasonal use restrictions.

Comment 51

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M03

I support the addition of 6M03 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M03 be eliminated from seasonal use restrictions.

Comment 52

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M03A

I support the addition of 6M03A to the NFTS.

Not included in any Alternative.

Although a short section, 6M03A is critical to connect 6M03 to NFS Road 21N44. This allows the user to travel south on 6M03 to 21N44 and connect to 6M02 and connect a loop. Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M03A be added to the "Preferred Alternative" and to be eliminated from seasonal use restrictions.

Response

This 0.08 mile trail was made part of 6M03 but was not included because it is in the Jacks Critical Aquatic Refuge..

Comment 53

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M04

I support the addition of 6M04 to the NFTS.

Included in Alternative 2.

6M04 is an expert level single track trail. It is important because it keeps green sticker vehicles off of French Creek Road.

The Soils and Water Resource Report Appendix F for 6M04 has this in the comments:

"Starting 22N79Y. Approx. 100' trail follows creek. Trail is very entrenched 1' + for about 1/2 mile to first perennial stream crossing. In this section there are failed waterbars, multiple constructed trails. Trail is on an ephemeral and perennial crossing and there is sediment to channel. Mitigations would be major relocation outside the scope of this project. After the multiple perennial stream crossings the rest of trail is in good shape and would be a medium."

This statement has five inaccuracies:
• The trail is NOT entrenched for 1/2 mile. The trail is entrenched for .08 miles and can be repaired easily. A major discrepancy. See GPS track below. 6M04 is the black trail, the entrenched section is highlighted in red.
• There are zero waterbars on the trail, so it is impossible to have failed waterbars.
• The trail in this location is not on an ephemeral stream.
• Sediment is not running into the perennial stream. If the individual doing the analysis had looked closely at the entrenched section, the individual would have seen that the dirt from the trench was deposited right next to the trail, on the banks of the rut. When motorcycle tires are allowed to spin the dirt is throw a couple of feet into the air. The dirt falls next to the trail. The evidence is that the banks of the rut are higher than the surrounding grade.
• Mitigations would not be major. A small realignment of the trail would get the trail off of the perennial stream.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest that a reevaluation and/or field trip to 6M04 be scheduled to look at the rutting and possibility of minor rerouting. I suggest 6M04 be included in the "Preferred Alternative" with an asterisk. I suggest 6M04 be eliminated from seasonal use restrictions.

Comment 54

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M05

I support the addition of 6M05 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M05 be eliminated from seasonal use restrictions.

Comment 55

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M08

I support the addition of 6M08 to the NFTS.

Included in Alternatives 2 and 5.

This trail is critical to keep OHV traffic off of Fourmile Ridge Road.

Despite what the DEIS states in Appendix F there is no major entrenchment. The topography of this trail is nearly flat. Please review the topographical map below depicting the trail on nearly flat terrain.

[Graphic:] Topographical map depicting 6M08 on nearly flat terrain.

I suggest a reevaluation and/or field trip to confirm the claimed rutting.

The DEIS gives 6M08 a grade of high in the cultural category. I have been unable to determine from the DEIS what heritage site this high grade pertains to. If the archeologist is referring the the garbage (rusty cans) located near the trail, a small reroute will be simple to accomplish. If the archeologist is referring to the railroad grade that the trail travels upon I would like to refer to NFS Road 22N66X which is almost entirely upon railroad grade.

I suggest a reevaluation and/or field trip to confirm the heritage site.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M08 be eliminated from seasonal use restrictions. I suggest 6M08 be reevaluated for heritage and watershed. I suggest 6M08 be included in the "Preferred Alternative" without an asterisk.

Comment 56

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M09

I support the addition of 6M09 to the NFTS.

Included in Alternatives 2 and 5.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M09 be eliminated from seasonal use restrictions.

Comment 57

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M10N and 6M47

I support the addition of 6M10 and 6M47 to the NFTS.

Included in Alternatives 2 and 5.

6M10N and 6M47 are depicted in the DEIS as two separate trails, the actual condition on the ground is that they are one trail. A short section between the two trails on the DEIS maps has been omitted. 6M10S is a separate trail. The DEIS incorrectly depicts 6M47 as connecting to NFS Road 23N15B. 6M47 connects to NFS Road 23N15C. Please refer to the topographical map below for clarification. 6M10N and 6M47 are depicted in blue. 6M10S is depicted in black.

[Graphic:] Topographical map depicting 6M10N and 6M47 as one trail.

The fires of summer 2008 had damaged a part of the trail. A small section is difficult to find because of bulldozer activity. As the vegetation returns the trail will be more obvious.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M10N and 6M47 be corrected to reflect a single trail. I suggest the short section that has been omitted between 6M10N and 6M47 be included. I suggest 6M47 be corrected to depict that it connects to NFS Road 23N15C. I suggest 6M10N and 6M47 be eliminated from seasonal use restrictions.

Comment 58

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

6M10S

I support the addition of 6M10S to the NFTS.

Included in Alternative 2.

6M10S is a world class single track expert only trail. It provides an extremely technical ride opportunity.

I have had much discussion regarding 6M10S with PNF personnel. It is agreed upon that this trail was never fully evaluated and likely that the actual trail was never surveyed. The fires of summer 2008 basically obliterated the upper section of the trail and therefore was extremely difficult for users familiar with the trail to find. I can only imagine how difficult it would have been for PNF staff to find it.

As discussed above, 6M10S is actually not part of 6M10N and is its own trail. Please refer to the topographical map in my comments of 6M10N for clarification.

Despite what the DEIS states, 6M10S does not drop into the Fox Creek drainage. Compare the topographical map above to the DEIS map below. The tracks are not the same and the trail remains clear of the drainage.

[Graphic:] DEIS map depicting 6M10S. Compare with topo map above.

I request a reevaluation and/or field trip to confirm that 6M10S does not have watershed issues.

I agree that the trail is on steep terrain. Local knowledge of this trail dictates that we ride this trail downhill to preserve trail conditions. I would suggest that a note on the trail map highly suggest that the trail be ridden downhill. I would also suggest that signage at the bottom of the trail request and suggest that the rider turn around and approach the trail from the top.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M10S be included in the "Preferred Alternative". I suggest 6M10S be depicted as an individual trail and not part of 6M10N. I suggest 6M10S be ridden downhill. I suggest 6M10S be eliminated from seasonal use restrictions.

Response

This trail was not included because it is in the Jacks Critical Aquatic Refuge..

Comment 59

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M11

I support the addition of 6M11 to the NFTS.

Included in Alternatives 2 and 5.

Despite what the comments in Appendix F state, other than the dozer damage during the summer 2008 fire, 6M11 is in perfect condition. There is no rutting and the trail is in fantastic condition.

I suggest a reevaluation and/or field trip to confirm said rutting.

This is another example of completely arbitrary opinions of the survey staff. I can tell you from a user who rides these trails multiple times every month that there is less rutting on 6M11 (almost nil) than on 6M10N. Yet 6M11 has an asterisk and mitigation requirements and 6M10N is acceptable the the PNF survey crew. It is as if two separate crews with two sets of standards surveyed these trails. There is no predictable pattern to these results.

Allow me to use an analogy. It is as if the survey crew was tasked to determine the outside air temperature, but was to do so without a thermometer. The survey crew has no choice but to "spitball" the temperature. For sake of argument the crew is tasked to "feel" the temperature on two separate days, but the catch is that the temp is an exact 60 degrees both day. It is likely that the crew will "feel" the temperature is about 55 degrees one day and "feel" the temperature is 62 degrees the next day. Sure they are ballpark, but not precise. This is exactly what is happening
in this process with regards to watershed, and it is showing up in the results!

Once again, I suggest that the entire trail system be resurveyed with regards to watershed.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M11 be included in the "Preferred Alternative" without an asterisk. I suggest 6M11 be eliminated from seasonal use restrictions.

Comment 60

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M12 and 6M13

I support the addition of 6M12 and 6M13 to the NFTS.

Included in Alternatives 2.

6M12 is a vital connector between NFS Road 22N92 and NFS Road 23N86. Without this trail the user is forced to go over to Coyote Gap or over to 6M10N to connect the upper trails to the lower trails.

I agree that the southern end of 6M13 is very steep and that mitigation would require rerouting. I suggest two things:
• Include the southern section of 6M13 (depicted in red) in the "Preferred Alternative" with an asterisk. Allow the PNF and the users to solve the problem at a later date.
• Include 6M12 (depicted in blue) in the "Preferred Alternative".
• Include the northern section of 6M13 (depicted in black) at the intersection of 6M12 in the "Preferred

Alternative".

[Graphic:] Topographical map depicting 6M12 and 6M13. I suggest the section in red be included in the "Preferred Alternative" with an asterisk.

The result is that the user will have a nice option to ride when traveling east and west along NFS Road 23N86 and NFS Road 22N66X. The northern section of 6M13 is a great trail and is much more interesting and challenging to ride than the road. Then at a later date, after mitigation is complete on the southern end of 6M13, we will have a great connector north and south.

I suggest 6M12 be included in the "Preferred Alternative". I suggest the northern section of 6M13 be included in the "Preferred Alternative". I suggest the southern section of 6M13 be included in the "Preferred Alternative" with an asterisk.

Comment 61

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M14

I support the addition of 6M14 to the NFTS.

Included in Alternatives 2 and 5.

Comments in Appendix F regarding watershed are unreasonable.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M14 be eliminated from seasonal use restrictions. I suggest 6M14 be included in the "Preferred Alternative" without and asterisk.

Comment 62

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M16

I support the addition of 6M16 to the NFTS.

Included in Alternatives 2 and 5.

I agree in the Appendix F comments that a steam crossing needs to be mitigated. There is one perennial crossing that is allowing sedimentation into the stream. A minor reroute and/or bridge construction will mitigate this area. The rest of the comments are completely unreasonable. The other crossings are negligible. There is little to no rutting, the trail is in fantastic shape. This one of my favorite trails. It has a wide range of diversity with regards to terrain.

This is another example of a completely arbitrary evaluation.

I suggest a field trip to discuss mitigation of the perennial stream crossing.

Season of use is unreasonable. A December 1st closure is unreasonable because nearly the entire month of December 2008 had perfect riding conditions. The same can be said for other months that fall within the proposed seasonal restrictions. Please refer to my comments titled "Seasonal Closure" for detailed comments.

I suggest 6M16 be eliminated from seasonal use restrictions.

Comment 63

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M19

I support the addition of 6M19 to the NFTS.

Included in Alternatives 2 and 5.

Comment 64

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M20W and 6M20E

I support the addition of 6M20W and 6M20E to the NFTS.

This is an extremely important connector trail. It connects the north end of the Little North Fork trail to 6M19. Without 6M20 we lose a valuable loop.

I agree with the Appendix F comments that the drop into the Little North Fork crossing is steep on 6M20E. With a realignment of the trail to allow for a shallow crossing and some minor rerouting on the climb out will will have a sustainable trail. I suggest 6M20E be included in the "Preferred Alternative" with an asterisk.

6M20W is in good shape and I support its designation.

I suggest 6M20E be included in the "Preferred Alternative" with an asterisk.

Comment 65

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M22N and 6M22S

I support the addition of 6M22N and 6M22S to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards to rutting and stream crossing are unreasonable when compared to other R5 forests.

Comment 66

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M23

I support the addition of 6M23 to the NFTS.

Included in Alternatives 2 and 5.

Once again we have a completely unreasonable evaluation in the watershed survey. 8% of the trail length has a fail grade yet the trail receives a high watershed grade and as a result an asterisk and requires mitigation. Yet compare to 7M05 which has 27% of the trail receiving a fail grade, but gets a medium watershed grade.

I suggest 6M23 be added to the "Preferred Alternative" without an asterisk.

Comment 67

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M24

I support the addition of 6M24 to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards to rutting and stream crossing are unreasonable when compared to other R5 forests.

Comment 68

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M26

I support the addition of 6M26 to the NFTS.

Included in Alternative 2.

It is difficult to determine in the DEIS what is causing the "extreme" rating with regards to the cultural category. The comments on page 364 state three possible sites (Beckwourth Trail, Swayne Lumber Camp, and Frog Rock). Since there is nothing documented for 6M27 in this section of the DEIS, and that my conversations with PNF staff has resulted in my learning that 6M27 has part of the trail on the Beckwourth Trail, I will assume that the Lumber Camp and Frog Rock are the sites that are giving 6M26 the "extreme" rating.

6M26 should not be omitted from the "Preferred Alternative" due to Frog Rock. I can guarantee you that the vandalism occurring is not from motorcycle riders. However, I do realize that 6M26 would in essence become a dead end without the designation of 6M27. I propose the following solution that would likely be outside the scope of this process, but I would like PNF assurance that this solution or something similar will be implemented within one year of the completion of this process:

I propose that the north end of 6M26 end at NFS Road 23N48X. From there the trail will cross the Oroville-Quincy Highway and a new trail would be constructed paralleling NFS Road 23N18 to connect to the Granite Basin Trails.

Comment 69

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M27

I support the addition of 6M27 to the NFTS.

Included in Alternative 2.

Part of 6M27 is on the Beckwourth Trail. I support relocating 6M27 off of the Beckwourth Trail. I do not support omitting 6M27 from the "Preferred Alternative" because of this cultural issue. However, if the PNF supports my solution outlined in 6M26, I would support the closure of 6M27.

Comment 70

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M30

I support the addition of 6M30 to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards stream crossing are unreasonable when compared to other R5 forests.

Comment 71

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M31

I support the addition of 6M31 to the NFTS.

Included in Alternatives 2 and 5.

Appendix F comments with regards stream crossing are unreasonable when compared to other R5 forests.

Comment 72

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M32

I support the addition of 6M32 to the NFTS.

Included in Alternative 2.

I agree with Appendix F comments that mitigation is required.

Comment 73

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M32

I support the addition of 6M32 to the NFTS.

Included in Alternative 2.

I agree with Appendix F comments that mitigation is required.

Comment 74

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M34

I support the addition of 6M34 to the NFTS.

Included in Alternatives 2 and 5.

Comment 75

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M35

I am unfamiliar with 6M35.

Comment 76

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M36

I support the addition of 6M36.

Included in Alternative 2 and 5.

6M36 is missing a section and is incorrectly depicted where it connects to NFS Road 23N23. When traveling north on 6M36, approximately .25 miles from the end, the trail makes a hard turn to the right and connects to 23N23 more SE than what the DEIS depicts. It appears that the survey crew missed the hard right turn. Since the trail is on old road bed it is common to continue straight past the turn. Please refer to the topographical map below. Please notice the missing section on the SW end.

[Graphic: Topographical Map]

Missing Trail Opposite 6M36.
Please note that there is a missing trail from the DEIS. There is a short loop on the east side of NFS Road 23N23. It is straight across from the actual exit of 6M36. Please refer to map above. Please include this short section in the "Preferred Alternative".

Comment 77

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Camping and Staging Area Near 6M36

There is a popular camping and staging area near 6M36. It is an open decomposed Granite area just south of N39 50 636 W 121 16 436. It is the small white area on the above map. I suggest this be designated as an open area to allow for camping with trailers and motor homes.

Comment 78

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

NFTS Road 23N28

I propose the following sections of NFTS Road 23N28 to be designated as "Open to All Vehicles" or designated for "mixed use". These two sections highlighted in green are essential to connect trail segments for vehicles without a license plate. The first map depicts a .43 mile section that would allow a green sticker vehicle to connect 5M13 to Coyote Gap Intersection. The second map depicts a .32 mile section that would allow a green sticker vehicle to connect the snow hut at Four Trees to NFTS 23N12Y.

Forest Service Manual 7715.77(7) gives guidance on when it is appropriate to designate short sections of ML-5 highway as "Mixed Use".

"It may be necessary to designate short segments of roads open to public travel (roads at Operational Maintenance Levels 3, 4, and 5) for motorized mixed use to provide a connection to or between routes designated for other motor vehicle uses. Consider mitigation of safety risks when allowing motorized mixed use on roads open to public travel, such as signs, speed controls, user education, modifications to road geometry, regulating the timing of commercial hauling, and other safety measures."

[Graphic:] Two short sections highlighted in green, designated as "mixed use", will allow green sticker vehicles to link trail segments.

Response

This road has been evaluated for mixed use and in the future additional trails may be need to avoid these road sections This analysis will be review as we develop the French Creek Travel Management Plan.

Comment 79

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

NFTS Road 23N95Y

I propose the following 2.02 mile section of NFTS Road 23N95Y to be designated as "Open to All Vehicles" or designated for "mixed use". The section highlighted in green is essential to connect trail segments for vehicles without a license plate.
This would allow green sticker vehicles to connect 6M35, 6M32, 6M33, 6M29, 6M23, and 7M07.

Forest Service Manual 7715.77(7) gives guidance on when it is appropriate to designate short sections of ML-5 highway as "Mixed Use". "It may be necessary to designate short segments of roads open to public travel (roads at Operational Maintenance Levels 3, 4, and 5) for motorized mixed use to provide a connection to or between routes designated for other motor vehicle uses. Consider mitigation of safety risks when allowing motorized mixed use on roads open to public travel, such as signs, speed controls, user education, modifications to road geometry, regulating the timing of commercial hauling, and other safety measures."

[Graphic:] 2.02 mile section highlighted in green, designated as "mixed use", will allow green stick vehicles to link trail segments.

Response

This road may be evaluated for mixed use in the future as we develop the Granite Basin Travel Management Plan.

Comment 80

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

NFTS Road 23N18

I propose the following three sections (.46 miles, .41 miles, 2.26 miles in length) of NFTS Road 23N18 to be designated as "Open to All Vehicles" or designated for "mixed use". These sections, highlighted in blue, are essential to connect trail segments for vehicles without a license plate.

[Graphic:] Three short sections highlighted in blue, designated as "mixed use", will allow green sticker vehicles to link trail segments.

Comment 81

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

10M08 (Nelson Creek Trail)

I support the continued multiple use of 10M08 (Nelson Creek Trail)

This is a NFTS trail. Closure of NFTS routes is outside the scope of this process.

I suggest Nelson Creek Trail be included in the "Preferred Alternative".

Comment 82

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

6M46 (Little North Fork)

I support the continued multiple use of Little North Fork.

Comment 83

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Big Bald Rock, Dome, Hanson Bar, Mountain House, Table Rock

Here is a link from the Plumas NF webpage that gives a description of these trails.

http://www.fs.fed.us/r5/plumas/recreation/hiking/frrd_trails.shtml

As you can see from this link, the trail descriptions either say that motorized vehicles are prohibited, not recommended, or no restrictions. The trails above have no restrictions listed. Some of these trails have links to official publications of the trail, and some of these publications make it appear that some trails are open to hiking only, while other publications clearly depict trails open to ATV's. However, I am not sure if the trail publications are accurate. For example, if you download and look at the Big Bald Rock trail publication, it would appear that it is a hiking only trail. However, if you read the webpage, horses and motorbikes are not recommended, but not prohibited. I think the following example would suggest that the webpage is most accurate - the Little North Fork has no restrictions according to the webpage, and we all know that the Little North Fork is a legal OHV trail. So in this case we know the webpage is accurate.

Big Bald Rock - Website states that motorcycles are not recommended, but NOT prohibited.
Dome - Website has no restriction on motorized vehicles.
Hanson Bar - Website has no restriction on motorized vehicles. My topo map depicts Hanson Bar as an OHV trail. See map below.
Mountain House - Website has no restriction on motorized vehicles.
Table Rock - Website has no restriction on motorized vehicles. Official publication advertises the trail as open to ATV.

Response

We have determined that these trails should remain non motorized trails. The Hanson Bar trail will be shown as motorized to the boundary with the Wild and Scenic Boundary.

Letter 222

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Mailing list only or nothing to code (do not attach a flag)

Letter 223

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	Request for 90 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

The purpose of this email is to formally request an extension of the public comment period for the Plumas Motorized Travel Management DEIS. I have been reading the DEIS but have not had the time to read the entire document. With the amount that I have read, I have found several errors that when taken cumulatively will have a significant effect upon the outcome of this process.

For example, the location of trail 6M10 is incorrectly depicted in the Alternative maps. This has lead to some confusion and the actual trail was not analyzed. The result is that the DEIS incorrectly depicts the trail as running along a drainage and into CRLF habitat, therefore the trail is not planned for addition and will be closed.

I attended the Oroville meeting last night and had several productive conversations with numerous specialist including Pete Hochrein and Tina Hopkins. I shared my concerns, including the example above. We are working collaboratively to come to a reasonable solution.

My concern is that given my limited review of the document I have found errors such as this. I want to ensure that the DEIS public comment period is as productive as possible. I participated in the public comment period for the same process in the Tahoe NF and it took all of 90 days to form substantive comments. I feel that an extension on the comment period will allow us to work further with the Plumas NF staff and create a more accurate document. Additionally, most of the public has full time jobs and it is going to take more than 45 days to digest the entire document.

Response

The comment period was extended 30 days. The mapped location of 6M10 made it very difficult to find following the 2008 Fox and Four Miles fires. 6M10 was added to Alternative 5 based on surveys completed in March 2009.

Letter 224

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Here is a follow up to an email that Dave Wood sent you earlier today. Attached is a jpeg of a GPS track depicting a trail that is not numbered in the Alternative maps. We call this the Rattlesnake trail and it connects 23N86 to 23N00C (or maybe 23N000, difficult to tell) and then 23N00. It is single track in character. As you can see by this track, the trail connects both roads. The Alternative maps depict this trail as a dead end. I believe this is due to the fact that 23N00C is missing.
Do we have a number designation for this trail?

Response

23N00C was added to all maps which allows for a connection with 5M11.

Letter 225

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Here is a link from the Plumas NF webpage that gives a description of these trails.

http://www.fs.fed.us/r5/plumas/recreation/hiking/frrd_trails.shtml

As you can see from this link, the trail descriptions either says that motorized vehicles are prohibited, not

recommended, or no restrictions. The trails above have no restrictions listed. Some of these trails have links to official publications of the trail, and some of these publications make it appear that some trails are open to hiking only, while other publications clearly depict trails open to ATV's. However, I am not sure if the trail publications are accurate. For example, if you download and look at the Big Bald Rock trail publication, it would appear that it is a hiking only trail. However, if you read the webpage, horses and motorbikes are not recommended, but NOT prohibited. I think the following example would suggest that the webpage is most accurate - the Little North Fork has no restrictions according to the webpage, and we all know that the Little North Fork is a legal OHV trail. So in this case we know the
webpage is accurate.

Big Bald Rock - Website states that motorcycles are not recommended, but NOT prohibited.
Dome - Website has no restriction on motorized vehicles.
Hanson Bar - Website has no restriction on motorized vehicle. My topo map depicts Hanson Bar as an OHV trail. See attached jpeg.
Mountain House - Website has no restriction on motorized vehicles.
Table Rock - Website has no restriction on motorized vehicles. Official publication advertises the trail as open to ATV.

Response

Existing trail use was coordinated with the Feather River Recreation Staff to show what is currently available for motorized use.

Letter 226

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Per our conversation last night at the Oroville meeting I wanted to get back to you with a more accurate depiction of trail 6M10. Attached is a jpeg of an accurate GPS track of 6M10. Although depicted in the Alternative maps as one trail (6M10N and 6M10S), you can tell by this map that we are actually talking about two separate trails.

The first trail depicted in blue connects 22N11X to 23N15. The GPS track of this trail on the eastern end is significantly different than the track depicted in the Alternative maps. I think I recall that you would make this change.
The second trail depicted in black connects the blue trail to the bottom of 22N11X. As you can tell by this accurate GPS track, the trail makes a turn away from the Fox Creek drainage and is significantly different than what is depicted in the Alternative maps.

Response

6M10 was added to Alternative 5 based on surveys completed in March 2009.

Letter 227

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Other request for specific information

Letter 228

Attributes

Attribute	Value
Early Attention	Provides proposals for new alternatives
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Consider Additional Information

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I would encourage you to take a look at what USFS "engineered" OHV trails look like. Foresthill OHV area, Tahoe NF. Take a ride on the western 1/3 of "Trail 6", with a novice rider. I have video of the entire loop, about 16 miles. This trail is in much worse shape, than any trail you have rated as "extreme" on the Plumas NF. This video shows the best of loop 6, it gets worse. Part of this loop depicted in this video was the site of a major wildfire a few years ago. The first crossing about two miles down is a mining claim and the miner accesses his claim by Quad. This is a "Designated Single track trail" It takes these inexperienced riders 25 minutes to reach the first bridge. http://www.vimeo.com/1968246

Comment 2

Action: Consider Additional Information

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.XXX of the FEIS

Take a look at the Middle Creek video, only two minutes. It shows one, of hundreds of water holes that comprise the Middle Creek OHV trail system, on the Upper Lake Ranger district, Mendocino NF. http://www.vimeo.com /2806986 This is the OHV area that Kathy Mick managed, prior to moving to R5. This area has multiple water crossings with significantly more impact than those found on the Plumas NF.

Response

For this Plumas NF effects analysis, the soil and water resource impacts determined to be adverse for routes proposed for addition to the NFTS were typically either route-generated sediment delivered to a stream channel or the capture of a stream channel by a route (section 3.5.6.2 of the FEIS). If these adverse impacts could be mitigated, the route was rated “High.” If the adverse impacts could not be mitigated within the scope of this FEIS, the route was rated “Extreme.”

Comment 3

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendices C, F, G and H of the Soil and Water Resource Report

The Hydrology report provides no Scientific evidence to support the ratings of trails in the DEIS. No Scientific evidence is provided to show that the sediment is entering the stream and moving as a result of the trail. No factual comparison of how much sediment moves naturally the watershed. NO evidence to support that the OHV trail is the source of the sediment. No upstream samples and no down stream samples to see how much sediment is above the crossing, in the crossing and how much is below the crossing, or how far it travels. The Hydrologist has no concept of legal OHV trails, within Region 5. Your criteria would exclude virtually every legally designated OHV trail in the United States! What you are calling extreme on the Plumas NF; represent some of the finest, World Class, OHV trails found anywhere!

Response

Appendices F, G and H of the Soil and Water Resource Report provide a summary of the effects rating for each trail proposed for addition to the NFTS. The full length of each proposed trail was field surveyed. The field survey data form is presented in Appendix C of the Soil and Water Resource Report. For each segment of each proposed route, the data form requires observations of whether or not sediment is delivered to a stream channel from route fill slopes, cut slopes, ditches or entrenchments, or surface drainage features. Detailed, segment-specific field survey information for each route is available from each PNF district by request.

Comment 4

Action: NEPA Process General

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I also attached the "dct clarification", which shows that you cannot use a Categorical Exclusion (CE) for the OHV trail projects that have been suggested in "future" projects. The "future" is now; we have participated in this process for over five years to arrive at a reasonable Travel Management plan. The designation of said routes would allow you to use the CE on an "existing" trail. But closing trails now will require an EA Environment Assessment or full NEPA DEIS. This is unacceptable and is no basis for OHV to continue to cooperate with the USFS.

Comment 5

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The lack of an OHV alternative must be corrected.

Comment 6

Action: NEPA Process General

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The failure to conduct site-specific analysis is a violation of the NEPA process. Excluding routes before analysis occurs does not provide the decision maker the opportunity to designate sustainable routes. You exclude trails, without the site-specific analysis, but direct your field crews to ignore the existing condition on the ground. The trail continues, but the field crew is directed to ignore the fact that the trail continues and only to follow the direction provided by inaccurate GIS material and staff omitting this and that in the office. Or just look at this one and not that one, but the one you omit is the sustainable route, but you will never know because you did not do the required site-specific analysis on each route. Correct the document and follow the law. Do the required site-specific analysis.

Response

Approximately 410 miles of inventoried routes were surveyed and those site-specific summaries can be found in Appendix A of the FEIS.

Comment 7

Action: Consider Additional Information

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

There are additional scientific studies on the Mendocino NF at Water Crossing, during events in which 300 riders pass in an hour. But these factual documents are omitted from the Plumas NF DEIS.

Comment 8

Action: See Attachment

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Study: Dru Barner Trail Ride, Water Quality Monitoring Report Rock Creek Watershed, Georgetown Ranger District. Date: June 23, 1990

Response

The referenced report does not provide new information for the FEIS analysis. The report concludes that concentrated motorcycle use for one day at one or two particular Eldorado NF stream crossings did not introduce large amounts of sediment into the stream. In-stream traffic by motorcycles at stream crossings was not automatically rated as an adverse effect for the soil and water resource effects analysis of the PNF FEIS. In fact, in-channel crossings (fords) are a proposed mitigation for proposed trails. For the PNF FEIS, a primary analysis issue is the delivery of route surface-generated sediment to stream channels. Such sediment delivery typically occurs during spring runoff events. The referenced report does not address that issue.

Comment 9

Action: See Attachment

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2]: Court Case: Earth Island Institute vs. Nancy Ruthbeck. Plaintiffs Motion for Clarification and Defendants Motion for stay.

Comment 10

Action: See Attachment

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 3]: Photo of Motorized Recreation

Comment 11

Action: Consider Additional Information

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Take a look at this water crossing at Rock Creek, El Dorado NF. Only two minutes. http://www.vimeo.com/1768482 The attached picture of me, on my way to the overall win, at the 2006 Fools Gold Enduro, Rock Creek OHV area, El Dorado NF. This is the exact crossing in the video link. In addition, I attached the Rock Creek Hydrology report, in which a USFS Scientific study was conducted, at this very crossing.

Letter 229

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

I have responded to the Randy Moore letter in (RED) with a few comments of my own and have responded in kind to this poorly crafted letter expressing a ridiculously lame position on the three mile Steps for Road Reclassification from a level 3 to a level 2 road. Most of your ML 3 roads are already downgraded from a financial standpoint to a ML 2 because logging operations no longer pay for or maintain these roads and the lack of USFS maintenance funds and effort has caused farther deterioration.

From an engineering stand point to cause as much investigations as your Randy Moor's letter implies to reclassify a ML 3 to a ML 2 is a gross waste of taxpayer dollars. Your model of "The Three Mile Limit" as address in the CVC (38026) is designed for State/County "highway" use and not the definition given to " highway" as address in (38001 a)" fire trails, logging roads, service roads,... regardless of surface composition."

A quick read of the CVC (2400 b and c)..."The Commissioner shall enforce all laws regulating the operation of vehicles and the use of the HIGHWAYS (not "highways" that are defined as logging roads and fire trails as per CVC (38001) "except that, on ways or places to which 592 makes reference".... CVC (592) "does not include a way or a place under the jurisdiction of a federal governmental agency, which lies on national forest or private lands and is open to the public..." State law as addressed by the CVC is not applicable to the USFS's quest to their ill conceived methods to deny access and using the CVC as an excuse.

Therefore all of this wallowing and trying to use the CVC and the CHP to help justify the USFS intended closing of 75% of ML 3 and 4 roads is ill conceived and will cause massive opposition.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as

required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as “highways” under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on langauge and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads.

Comment 2

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

By definition, Maintenance Level 3-5 roads are open to the public for the use of passenger cars. Consistent with 23 USC 101 and 23 CFR 460.2, the Forest Service considers these roads to be public roads and highways. Under 36 CFR 212.5(a) (1), state traffic laws generally apply on National Forest System roads. (Not in Calif. As per the CVC section 592 and 2400 a and b) Therefore, anyone operating a motor vehicle on Maintenance Level 3-5 roads in California must have a valid driver’s license in accordance with Forest Service Manual 7700, Chapter 7730, Section 7731.2(5). In addition, these roads must be signed in accordance with the Manual of Uniform Traffic Control Devices. (The MUTCD is standard State/County signing and the CVC provides funding for its placement.)

Mixed-use analysis for Maintenance Level 3-5 roads shall be completed in accordance with the direction contained in EM-7700-30 (Guidelines for Engineering Analysis of Motorized Mixed Use on National Forest System Roads8). The analysis that supports a decision to allow mixed use on Maintenance Level 3-5 roads must consider the probability and severity of accidents. (With most ML 2 and 3 roads only has an ADT of less than 5 to 10,... this is a no brainer. I also note that you do not discriminate against mountain bike riders on our roads that are also exposed to these implied severe accidents)

If a national forest wishes to allow mixed use on a Maintenance Level 3 or 4 road, it must first consider whether to reclassify the road. When reclassifying a Maintenance Level 3 or 4 roads to a Maintenance Level 2 road, a national forest shall consider the steps shown below. These steps provide for the on-the-ground changes that are generally needed to accomplish operational Road Management Objectives for Maintenance Level 2 high-clearance roads and to clearly distinguish high-clearance roads from roads maintained for passenger cars.

Steps for Road Reclassification
1. Mixed use analysis;
2. Analysis of the proposed change in public use; (Because this is what we want!!!!) 3. Modification of Road Management Objectives and associated Infra data ;(Government Speak???) 4. Entrance strategies to modify driver expectations, such as surface roughening; (Tear up a good road to make it more rough, (… = $$$$$$ sweet!!) 5. Signing changes, including consideration of the following: (What signs, (I never see any) a. Installation of a sign stating that the road is &Not maintained for passenger car use, 8 (MUTCD) and b. (Converting standard horizontal route marker signs to vertical route marker signs; c. (What is this??) and 6. Determining if any structural changes to the road are necessary, including removal of culverts, installation of rolling dips, and out-sloping.(Tearing up more road = $$$)

Comment 3

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

This memorandum reiterates the Pacific Southwest Region’s policy for treating public safety as a paramount consideration (No you are trying to close public access to our National Heritage and using "safety" as a gross exaggeration!) when determining whether to allow motorized mixed use (mixed use) on National Forest System roads. It also answers several questions that have been raised about the Region’s mixed-use policy in light of the October 1, 2008, revision to Forest Service Manual 7700 - Transportation System, Chapter 7730, &Road Operation and Maintenance.8 For additional information on the Region’s policy, please refer to the enclosed memoranda dated June 20, 2007, and August 21, 2006.

National forests should limit mixed use on Maintenance Level 3-5 roads to road segments that do not exceed three miles and for which road reclassification is infeasible. (The big question is why???)If reclassification is infeasible, the following direction applies:

Road Segments Less Than 3 Miles

If a national forest wishes to allow mixed use on a road segment that is less than 3 miles, the mixed-use analysis completed by the national forest must be approved by the Regional Engineer. If the Regional Engineer does not concur with the analysis completed by the national forest, mixed use will not be allowed on the road segment. If the Regional Engineer concurs with the analysis, the national forest will consult with the appropriate office of the California Highway Patrol to determine whether it concurs with the analysis. See 36 CFR 212.5(a) (1) and 36 CFR 212.53. If the California Highway Patrol concurs with the national forest's analysis, mixed use may be allowed on the road segment. Additional information and details on coordination with the California Highway Patrol is forthcoming. (Based on this memo and the telephone call that I had with Kathleen Mick, this is what I was talking about,(more CHP letters on this subject) If the California Highway Patrol does not concur with the analysis, and the Forest Supervisor still wishes to allow mixed use on the road segment, the Forest Supervisor shall provide the Regional Forester's Team with a written analysis seeking approval to allow mixed use. The Regional Forester's Team will determine whether the national forest may allow mixed use on the road segment. (What and Over rule the CHP after they have spent time and money $$$$$$ on this??)

Roads Segments Exceeding 3 Miles

In rare cases, the Regional Forester's Team may approve exceptions to the three-mile limit for mixed use on Maintenance Level 3 roads. If the Forest Supervisor wishes to allow mixed use on a road segment that exceeds three miles, the Forest Supervisor shall provide the Regional Engineer with a written analysis demonstrating that road reclassification (to a ML2 to allow us unwashed to ride our ATVs) is infeasible and that allowing mixed use on the road segment is needed to meet resource and/or other management objectives contained in the Forest Plan. If the Regional Engineer does not concur with the national forest's analysis, mixed use will not be allowed on the road segment. (GOD has SPOKEN!!) If the Regional Engineer concurs with the analysis, the Regional Engineer shall seek approval from the Regional Forester's Team to allow mixed use on the road segment. After consulting with the Office of the General Counsel, (Now we get the lawyers involved,,, more bureaucratic group groping) the Regional Forester's Team will determine whether the national forest may allow mixed use on the road segment. All of this wallowing for a segment of ML3, downgraded to a ML2 that is only a dirt road to begin with and is so rough that a Chevrolet passenger car could barley traverse on it, (…very slowly. This touchy feely approval process that the USFS is outlining will cost nothing but $$$$ and take forever to implement any reclassified ML3 road (this is 75% of our access roads), (Thus reinforcing the public's position that the USFS continues to fumble around and engage in bureaucratic double speak and that you desperately grasp at any ill conceived method to try and keep mixed use and the public from their rightful access to our National Heritage,.....Just what the USFS was planning on from the beginning.

Letter 230

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Seems like every time I turn around there is more and more incorrect and almost evil "environmental" impact on our lives. Not to mention the way that these people love to abolish how we all love to vent or spend our vacation time. I could go on forever on how riding is good for the soul, family strength, and relationships. However, it is almost sickening to me how these people have worked their way into our lives via, schools, TV, the media, and all other means they have at the government's disposal.

Letter 231

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Activties on Public Lands (General, Multiple)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

First you should all keep in mind that recreation in our Plumas National Forest is very important to the Plumas County economy as our National Forest occupies 76% of our county.

Response

Your comment has been noted.

Comment 2

Action: Public Involvement

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The public has been lead to believe that Alternate 2 was the "Proposed Action" for the road management plan. This includes the letter to interested parties dated Dec.18, 2008 to introduce the Alternates and the Workshops. No mention that the "responsible personnel" preferred Alternate 5. The 443 page DEIS report has only one sentence that mention the FS preference. The article in the Feather River Bulletin dated Jan. 28, 2009 quoting Alice Carleton only referred to Alternate 2 again no mention of Alternate 5.

If the public thought that Alternate 2 (as mentioned in all the public notices) was a good plan ("proposed action" would make you think that is the plan you are considering) I would assume that most of the public would go no further with their comments to the Forest Service.

Response

The last sentence of the first paragraph of the Abstract (Page i) states that Alternative 5 is preferred by the responsible official. In a letter sent to the public on February 6, 2009 it was also stated the Alternative 5 is preferred by the responsible official.

Comment 3

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

I prefer Alternate 2 to Alternate 5.
Alternate 5 restricts travel to many scenic locations and cuts off some of the loops included in previous routes from

the summer use maps as, an example, old route #61 FS#23N11. This route and many others such as in the Squaw Valley FS# 28N01 and 26N50 and Sloat FS# 23N09 areas, are no longer continuous loops because the Forest Service doesn't want multi use on Level 3 roads. Most of these loops use level 3 roads for a short distance to make a continuous loop.

Response

Road 23N11 was not part of OHV Summer Use route #61. Road 28N01 in Squaw Valley has been changed to a maintenance level 2 road to accommodate mixed use. 26N50 was previously changed to a maintenance level 2 road to accommodate mixed use.

Comment 4

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I prefer Alternate 2 to Alternate 5.
It seems that restricting Level 3 roads to licensed vehicles only leaves out ATV's and some motorcycles as multi use (licensed for street and off road) motorcycles will still be allowed on the Level 3 roads. If you're concern is visibility motorcycles are less visible than the quads but these motorcycles will still continue to use Level 3 roads.

Comment 5

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

I prefer Alternate 2 to Alternate 5.
The forest service claims it is because of CHP but CHP has said in a letter dated December 19, 2007
"We are not familiar with all the ML 3 Forest Service roadways, but if they are gravel or other dirt or unpaved roads that have been operating as mixed use roadways for years, it is our belief these roads would fall under the "roughly graded trails and roads upon which vehicular travel by the public is permitted" portion of Section 38001 VC and would, therefore, be eligible for your mixed-use definition." (Underline added for emphasis.)

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3,4 and 5 Roads.

In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

Comment 6

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

I prefer Alternate 2 to Alternate 5.
Plumas County Board of Supervisors stated in their meeting and a letter that they were sending to the Forests Service and CHP that they will continue to allow OHV use on the county gravel and dirt roads. FS road maintenance levels are irrelevant to the CHP and the public. The most distinguishing characteristic of a road is its surface composition. Is it paved or not? Unpaved roads are exempt from the definition of a "highway" under the California

Vehicle Code.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3,4 and 5 Roads.

In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

Comment 7

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I prefer Alternate 2 to Alternate 5.
If your concern is the use of roads during commercial or logging operations then closed the affected route temporarily.

Comment 8

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

A significant one of my concerns is the amount of routes/mileage the Forest Service has eliminated from one specific area, Squaw Valley. Most of the mileage lost between Alternate 2 and Alternate 5 was in this area. I am requesting a field trip to Squaw Valley as soon as the weather and road conditions permit to review the conflicting data in the DEIS and have some understanding why Forest Service has eliminated most of this area from Alternate 5 (no need for a field trip if you adopt Alternate 2).

Comment 9

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Squaw Queen Valley area

13M32 possible historic site??? (FS camp junk pile) attach pictures to comment please add to Alt 2.
This has historically been a dispersed camping area and was used by the FS in the '70's.

13M10 aka FS#26N50 (Jenkins Sheep Camp route) eliminated off the Alt 5 map
Refer to page 367 for heritage site. No idea what category M means.
Where are the plants located – they claim on page 296/297 and 312 that the plants are abundant but on page 383 the effects are E (assume extreme) the reports are contradictory.
Where is the water resource problem located (or is this just generic)?
No road number in water resource descriptions as in the botanical resource.

13M11 trail?
12M11 number is on the map but not the line for the road.
28N01 the whole length needs to be mixed use. This is a dirt road with very good visibility and makes many connections.

13M10/13M09 (Jenkins Sheep Camp/Camp 13) milk weed vetch is locally abundant so why the restrictions on page 312/313.

25N05 on the map is in the incorrect location. It was rerouted out of the meadow/spring about 6 years ago. The new route show on Alt 1 as a dotted line but never got changed.

25N72 was partially decommissioned but also still shows on the map. They didn't put in the new connection trail 13M05/13M07 that shows on Alt 2 on the Alt 5 map (5 still has the old decommissioned road).

Response

Routes were dropped in Alternative 4 and 5 due to mitigation requirements outside the scope of this document.

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Little Last Chance

15M03 add to Alt 5 dispersed camping site (with a picnic table) that is used by different recreational users including horsemen.

17M05 (behind Frenchman) the trails is ----miles long and only 0.1 is effected by 8 plants (suggest building a fence for the 8 plants) and leave the trail on the map. Page 291

Response

15M03 was added to Alternative 5. 17M05 requires relocation and new construction outside the scope of this document.

Comment 11

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

LaPorte Rd/Massack

Add 10M16 to Alt 5. Connects Lost Cabin to Little Volcano Rd. It is in the generic watershed but nowhere near water. The north end of this route goes to a University of Nevada earthquake monitoring site

Response

Added to Alternative 5.

Comment 12

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternate 2 page 45 says it has the most dispersed recreation sites with 31 sites and the on page 46 it says that Alt 5 has the most dispersed recreation sites with 28. Who has the most and where are they?

Response

The analysis was corrected to state that Alternative 5 has the second highest amount of access to dispersed use areas of the alternatives that add trails to the NFTS.

Comment 13

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Page 55 1 B 2 11.2 miles of mixed use with passenger cars where are they?

Response

Only the Slate Creek road 24N28 is being proposed for mixed use. 23N28 and 28N01 were determined to be best managed as Maintenance Level II roads.

Comment 14

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 51 permitted uses such as woodcutting are outside of the scope. Is this good or bad for the woodcutters?

Response

Firewood cutting is regulated by the firewood permit. In the future there will be opportunities for areas to be open to firewood cutting as allowed in the firewood permit at the discretion of the District Ranger.

Comment 15

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS Table XX, Appendix D of the Soil and Water Resource Report, Project maps attached to the FEIS

Watershed reference page 94 what roads do they effect???? No correlation to the summary in the back of the book

Response

Watershed boundaries for the motorized road and route density figures in Table 24 are presented in Appendix D of the Soil and Water Resource Report. The density difference from alternative 1 (times the watershed area) represents the number of miles of existing, unauthorized routes not added to the NFTS. The density difference from alternative 3 represents the number of miles of trail added to the NFTS. For example, for watershed 110114, alternative 2 would add to the NFTS 3.1 miles of trails and prohibit motorized traffic on 11.2 miles of existing routes, resulting in a density of 4.49 miles per square mile. Particular route locations are presented on project alternative maps attached to this FEIS.

Comment 16

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 133 which Bucks Creek (Feather River District or Bucks Lake)
Which Rock Creek (Meadow Valley or Feather River Canyon)

Response

On page 133 of the DEIS; the only reference to Bucks and Rock is in table 34. Table 34 references Critical Aquatic Refuges (CAR's). The Rock CAR is in the Meadow Valley area, including the S.Fork of Rock Creek (T23N, R9E). The Buck's CAR includes the Buck's Lake Wilderness adjacent to Buck's Lake and part of Buck's Creek.

Comment 17

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Page 172 ERROR! Reference source not found (that's what the page says)

Response

Correction made in FEIS.

Comment 18

Action: Update, Change, or Add Data to Existing Studies

Resource(s):

Disposition: Resolved: Comment acknowledged; does not provide new information

No explanation for the Cultural Resource code.

Response

PRE - Prehistoric, HIS - Historic, MUL - Both Prehistoric and Historic

Comment 19

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendices F, G and H of the Soil and Water Resource Report, project maps attached to the FEIS

Water Resource no explanation on the location of roads the water resource decision effects. Small maps in the back of the book don't help page 422/423

Response

Route-specific summaries of field survey information and soil and water effects are presented in Appendices F, G and H of the Soil and Water Resource Report. Detailed maps of trails proposed for each alternative are available on-line or (upon request) on compact disc.

Letter 232

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We are very concerned about the loss of trails with all but Alternative 1. Like you, we have been working on this for the last 4 years and thought we were making progress but it seems we have taken a step back. We believe Alternative #1 with a few changes would work best. There are several trails in the area we use that should be left open with the biggest problem being private property, if the private land is not posted and has been used by the public to access the forest for decades then why must it now be closed? I believe in some cases an easement exists that no one has researched in other cases maybe one could be acquired. We have formally adopted over 10 miles of these trails and spend about 200 hours a year keeping them clear and litter free both on Forest Service land and private. I would be willing at your convenience to meet someone at the proposed trail closers and see what needs to be done to keep them open. We are willing to use our own time and money if feasible to keep them open. I will send you a follow up e-mail with some of the specific trails if you think it will help. I get the feeling a decision has already been made or if not please advise us of anything we can do to help.

Response

Routes were not considered if private easements are required. No routes will be decommissioned with this project and additional routes can be proposed in future projects and easements obtain with those proposals.

Letter 233

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Request for confirmation of receipt of letter

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Close all routes south of 8M11. 1) Restrict motorized access to the confluence of Meadow Valley Creek and Rock Creek. Off road motorized travel has created a braided route here. People wanting to access Rock Creek need to walk down a steep, rocky trail. Make them walk a little farther to access this beautiful area and they will bring less trash with them. 2) Restrict motorized access to the small meadow east of Meadow Camp (8M57?). Again, off road motorized travel is creating a braided route here and severe damage is occurring in the meadow. Vehicular access to the meadow should be stopped. Restricting access at 24N29 would stop vehicles from traveling cross-country to access the creek and meadow. 3) Use the boulders piled at Meadow Camp to restrict access to the large meadow west of the camping area. This would keep people from driving vehicles in the mud hole just north of Meadow Valley Creek. This illegal activity degrades the meadow and the quality of water in Meadow Valley Creek.

Response

This would occur with the selection an action alternative restricting cross country travel.

Comment 2

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Close all routes north of 8M11 and south of Bucks Lake Road. These roads were recently opened up by the Forest Service for timber management. They should not remain open to the public for motorized recreation. Several of the routes are steep and rutted, causing erosion.

Response

None of these routes are included in any action Alternaive.

Comment 3

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Close and restore 8M17. This route is impassible due to a land slide above Wapunsie Creek. Severe erosion is occurring here. The route should be closed and revegetated.

Response

This trail is dropped in Alternatives 4 and 5 because it is on the Beckwourth Trail.

Comment 4

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Close 8M18 to motorized travel as the south end terminates at private property.

Response

This trail is dropped in Alternatives 4 and 5 because it is on the Beckwourth Trail.

Comment 5

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Close routes 8M13 and 8M14 to motorized vehicles. These single track trails appear to be created by motorcycles following fire lines cut by the Forest Service and should be closed.

Response

This trail is dropped in Alternatives 4 and 5 because of watershed mitigation concerns.

Comment 6

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Close routes 8M15 and 8M16 to motorized vehicles as they occur on highly erodible soils and are causing severe erosion. Due to the open nature of the area, motorcycles frequently travel cross-country and are creating a maze of trails. This behavior should be stopped as it is leading to loss of vegetation and erosion. I would rather see the Forest Service work with motorized users to create a single-track trail than have motorcycles create an unregulated motorized use area.

Response

Watershed mitigations are needed on these trails.

Comment 7

Action: Alternative 4 (NR protection and CIRCAs)

Resource(s): Land Designation and Management

Disposition: Resolved: Other (SEE RESPONSE)

I am in support of Alternative 4 as it emphasizes natural resource protection and avoids development in roadless areas. My primary concern is how the unchecked proliferation of roads on Plumas National Forest lands has fragmented wildlife habitat. I am especially concerned about wide-ranging species that have specific habitat requirements like forest carnivores. Maintaining linkages and connectivity across the national forests of Northern California is essential to the viability of remnant populations of Sierra Nevada red fox, marten, Pacific fisher and wolverine. I was pleased to see that the 1988 Draft Forest Carnivore Network was used in the DEIS.

Response

Correction - The Plumas NF Draft Carnivore Network was developed in 1996. The Draft Carnivore Network is not a formal land designation, but an analysis tool used to evaluate habitat fragmentation at the project scale.

Comment 8

Action: Consider Additional Information

Resource(s): T&E, Special Status (plants and animals)

Disposition: Resolved: Other (SEE RESPONSE)

I hope that the following developments regarding the Pacific fisher will be addressed in the final Plumas Travel Management EIS.

Since the release of the DEIS, the California Fish and Game Commission voted to designate the Pacific fisher as a candidate for protection as a threatened or endangered species under the California Endangered Species Act and initiated a review of the species to determine if full protection is warranted.

Response

The designation by the California Fish & Game Commission of the Fisher as a candidate under the State Endangered Species Act does not affect its status as a Federally listed Sensitive Species by the Forest Service. The Forest Service, until such a time that its federal status changes, will continue to address the Fisher as a Sensitive Species.

Comment 9

Action: Consider Additional Information

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

I hope that the following developments regarding the Pacific fisher will be addressed in the final Plumas Travel Management EIS.

The fisher is also a candidate for federal protection. The Bush administration determined that the Pacific fisher warranted protection, but that such protection was precluded by lack of resources; instead of protecting the fisher the administration placed it on the federal candidate list, along with 250 other species. With the recent change in administration, however, it is likely that the fisher will see federal protection in the next few years.

Response

The Candidate Status for the Fisher does not change or modify Forest Service direction regarding this species. The Fisher is a Forest Sensitive Species and is addressed as such in the FEIS. Should the U.S. Fish & Wildlife Service decide in the future to change the status of the Fisher from "candidate" to "proposed", this would require the Forest Service to initiate Section 7 Conferencing requirements under the Act, at that time. In the interim, the Forest Service is only required to address the Fisher as a Sensitive Species. Even with the recent re-introduction of fisher onto SPI's Stirling Tract, the Fisher does not occur or have a documented occurrence record on the Plumas NF (A. Facka, personal communication), therefore, the wildlife analysis considered the effects to suitable habitat for the fisher in evaluating potential effects.

Comment 10

Action: Consider Additional Information

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

I hope that the following developments regarding the Pacific fisher will be addressed in the final Plumas Travel Management EIS.

California Fish and Game plans on reintroducing the Pacific fisher in the Sierra Pacific Industries Stirling Management Area, on the northern border of the Plumas National Forest. If translocation efforts are successful, Pacific fisher may disperse onto the Plumas National Forest.

Response

The decision to reintroduce Fisher onto SPI lands has been finalized by the Department of Fish & Game. Whether the Fisher disperses onto Forest Service lands is purely speculative at this time and cannot be analyzed in detail in the FEIS. To date the fisher has not been documented on Plumas NF Lands (A. Facka, personnal communication). It is unknown whether the fisher will disperse onto the Plumas NF in the future and how they maybe affected by ongoing uses on National Forest System Lands. However, in presentations made by the Department, Sierra Pacific Industries and Dr. Roger Powell (principal investigator), the Sterling Tract re-introduction is designed to test and evaluate the effects of forest management on the Fisher. This approach will allow researchers to learn how forest management affects Fisher occupancy, home ranges, movements, etc. Should fisher occupy National Forest System lands in the future, management of National Forest System lands will follow direction in the 2004 Sierra Nevada Forest Plan Amendment and associated standard & guidelines for the Fisher.

Letter 234

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The population of the US and California has grown incredibly since Audubon's day. New technologies have allowed humans to travel farther and faster than ever before. Off-highway vehicle use has exploded in recent decades, prompting management. The Forest Service has identified unmanaged recreation as one of the top four threats to forest health nationwide.

The Board of Directors of Plumas Audubon supports travel management on the Plumas National Forest. Our primary concern is how roads adversely affect fish and wildlife and their habitat. We view the proliferation of user-created roads, which receive no environmental analysis, as a threat to fish and wildlife.

Comment 2

Action: Restoration/Reclamation/Bonding

Resource(s): T&E, Special Status (plants and animals)

Disposition: Resolved: Comment acknowledged; does not provide new information

We [Plumas Audubon Society] advocate that the Forest Service take a proactive approach to conserve and restore fish and wildlife through the following measures.

Restore threatened, endangered, and sensitive species habitat where unauthorized trails and roads have been created:

The Endangered Species Act mandates that the Forest Service protect threatened and endangered species (e.g. Bald Eagle, California Red-legged Frog). In addition, the Plumas National Forest has a list of sensitive species that they consider when implementing management actions (e.g. California Spotted Owl, Northern Goshawk, American Marten, Pacific Fisher, and California Wolverine).

Forest Service system roads undergo environmental analysis but user-created roads and trails do not. Plumas Audubon recommends that unauthorized roads and trails in threatened, endangered, and sensitive wildlife species habitats be closed and restored.

Response

All unauthorized routes not considered in Alts 2-5 will be allowed to undergo passive restoration. Over time it is expected that these routes will recovery and provide habitat for wildlife.

Correction to commentor statement - Bald Eagles are no longer listed under the Endangered Species Act. Listed species such as the Valley Elderberry Longhorn Beatle and California Red-legged frog were both analyzed using the project design criteria developed with the USFWS as part of the October 2006 Programmatic Agreement between Region 5 of the Forest Service and the US Fish & Wildlife Service. The October 2006 Programmatic Agreement develop specific project design criteria for threatened and endangered species that needed to be met in order to reach a "no affect" or a "May affect, Not likely at adversely affect" determination. If the criteria was met for either determination, the programmatic agreement considered Section 7 Consulation to be completed and required no further consultation between to two federal agencies.

The sensitive species addressed by the commentor are analyzed in the FEIS (Terrestrial Wildlife Section, Aquatic Section and Botanical Resources Section).

User created routes, under Altneratives 1, 2, 4, and 5, did undergo environmental analysis and review. Based on analysis of routes under Alternative 1; Alternatives 2, 4 and 5 were developed to manage for vehicle use of National Forest System Lands while protecting and minimizing impacts to threatened, endangered and sensitive wildlife species.

Comment 3

Action: Removal/obliteration

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

We [Plumas Audubon Society] advocate that the Forest Service take a proactive approach to conserve and restore fish and wildlife through the following measures.

Restore Vehicle Restricted Areas where unauthorized roads have been created

Vehicle Restricted Areas have been established on the Plumas National Forest to protect unique biological and cultural values. Unfortunately, unmanaged recreation has encroached into these areas and threatens to degrade the values that these areas were established to protect.

To prevent further degradation and improve habitat for fish and wildlife species, Plumas Audubon recommends that user-created routes be eliminated from existing Vehicle Restricted Areas.

Response

Alternatives 2-5 do not designate motorized trails within Vehicle Restricted Recreation Areas.

Comment 4

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Most of the user-created routes listed below contact the perimeter of Vehicle Restricted Areas. To ensure there is no encroachment into Vehicle Restricted Areas these routes should terminate at controllable locations or be closed and restored. All routes within Vehicle Restricted Areas should be closed and restored. These routes are identified with an asterisk (*).

Beckwourth Ranger District
U7968 Thompson Peak Vehicle Restricted Area
U7976 Thompson Peak Vehicle Restricted Area
U7977 Thompson Peak Vehicle Restricted Area
U8202 Frenchman Lake Vehicle Restricted Area
U8204 Frenchman Lake Vehicle Restricted Area
U8198 Frenchman Lake Vehicle Restricted Area
U8241 Adams Peak Vehicle Restricted Area
U8238 Adams Peak Vehicle Restricted Area
U7550 Adams Peak Vehicle Restricted Area
U7547 Adams Peak Vehicle Restricted Area
U8243 Adams Peak Vehicle Restricted Area
U5233 Adams Peak Vehicle Restricted Area
U8247 Adams Peak Vehicle Restricted Area
U8249 Adams Peak Vehicle Restricted Area
U8250 Adams Peak Vehicle Restricted Area
U8252 Adams Peak Vehicle Restricted Area
0.3 acre OHV use area Adams Peak Vehicle Restricted Area
U8447 Lakes Basin Vehicle Restricted Area
U8457 Lakes Basin Vehicle Restricted Area
0.2 acre OHV use area McRae Ridge Vehicle Restricted Area

Response

No routes will be designated in Vehicle Restricted Recreation Areas under Alternatives 2-5.

Comment 5

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Most of the user-created routes listed below contact the perimeter of Vehicle Restricted Areas. To ensure there is no encroachment into Vehicle Restricted Areas these routes should terminate at controllable locations or be closed and restored. All routes within Vehicle Restricted Areas should be closed and restored. These routes are identified with an asterisk (*).

Feather River Ranger District
U5612 PCT Vehicle Prohibited Area
U8435 PCT Vehicle Prohibited Area
U8495 Middle Fork Vehicle Restricted Area
U8328 Middle Fork Vehicle Restricted Area
U???? Middle Fork Vehicle Restricted Area (south of Nelsons Crossing)
U???? Middle Fork Vehicle Restricted Area (road east of Feather Falls TH)*
U8344 Middle Feather Vehicle Restricted Area (Little California Mine)*
U8610 Beartrap Mountain Vehicle Restricted Area
U9040 Beartrap Mountain Vehicle Restricted Area (proposed OHV trail)

Response

No routes will be designated in Vehicle Restricted Recreation Areas under Alternatives 2-5.

Comment 6

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Most of the user-created routes listed below contact the perimeter of Vehicle Restricted Areas. To ensure there is no encroachment into Vehicle Restricted Areas these routes should terminate at controllable locations or be closed and restored. All routes within Vehicle Restricted Areas should be closed and restored. These routes are identified with an asterisk (*).

Mount Hough Ranger District
U8594 Bucks Lake Wilderness Vehicle Prohibited Area
U6225 PCT Vehicle Prohibited Area*
U6229 PCT Vehicle Prohibited Area
U8060 Ben Lomond Vehicle Restricted Area
U7904 Ben Lomond Vehicle Restricted Area*
U7905 Ben Lomond Vehicle Restricted Area*
U7906 Ben Lomond Vehicle Restricted Area
U7907 Ben Lomond Vehicle Restricted Area
0.3 acre OHV use area Ben Lomond Vehicle Restricted Area*
0.6 acre OHV use area Ben Lomond Vehicle Restricted Area*
U8062 Ben Lomond Vehicle Restricted Area
U8064 Ben Lomond Vehicle Restricted Area
U8066 Ben Lomond Vehicle Restricted Area*
U8068 Ben Lomond Vehicle Restricted Area*
U8058 North Fork Vehicle Restricted Area
U???? Grizzly Peak Vehicle Restricted Area (route on Indian Cr. south of Tville)
U???? Grizzly Peak Vehicle Restricted Area (route on Indian Cr. south of Tville)
U8015 Grizzly Peak Vehicle Restricted Area
U7605 Grizzly Peak Vehicle Restricted Area
U7606 Grizzly Peak Vehicle Restricted Area
U7602 Grizzly Peak Vehicle Restricted Area*
0.2 acre OHV use area Grizzly Peak Vehicle Restricted Area*
U7797 Grizzly Peak Vehicle Restricted Area*
U7601 Grizzly Peak Vehicle Restricted Area*
U7795 Grizzly Peak Vehicle Restricted Area
U8998 Grizzly Peak Vehicle Restricted Area
U8965 Grizzly Peak Vehicle Restricted Area (proposed OHV trail)
U8997 Grizzly Peak Vehicle Restricted Area (proposed OHV trail)
U8981 Grizzly Peak Vehicle Restricted Area (proposed OHV trail)
U8979 Grizzly Peak Vehicle Restricted Area (proposed OHV trail)

U8027 Grizzly Peak Vehicle Restricted Area
U8020 Grizzly Peak Vehicle Restricted Area
U8019 Grizzly Peak Vehicle Restricted Area
U7795 Grizzly Peak Vehicle Restricted Area
U80?? Grizzly Peak Vehicle Restricted Area (north of 25N29A)
U8335 Middle Feather Vehicle Restricted Area
U8332 Middle Feather Vehicle Restricted Area*
U5767 Middle Feather Vehicle Restricted Area
U8346 Haskins Valley Vehicle Restricted Area*
0.2 acre OHV use area Haskins Valley Vehicle Restricted Area*
U5465 Butt Valley Vehicle Restricted Area*
U8077 Silver Lake Vehicle Restricted Area
U6126 Keddie Ridge Vehicle Restricted Area
U6128 Keddie Ridge Vehicle Restricted Area*
U7979 Thompson Peak Vehicle Restricted Area
U7941 Thompson Peak Vehicle Restricted Area
U6506 Snake Lake Vehicle Restricted Area
U6507 Snake Lake Vehicle Restricted Area
U8033 Butterfly Valley Vehicle Restricted Area
U???? Butterfly Valley Vehicle Restricted Area (north of U8033)
U6301 Roundhouse Vehicle Restricted Area
U6916 Antelope Lake Vehicle Restricted Area

Response

No routes will be designated in Vehicle Restricted Recreation Areas under Alternatives 2-5.

Comment 7

Action: Removal/obliteration

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Restore areas in State Game Refuges where unauthorized roads have been created
The State of California has established a system of game refuges "for the propagation and protection of game species, including managing wetlands for migratory waterfowl habitat and nesting, and designating winter feeding grounds for large mammals." These refuges serve as breeding "source" areas for many game species.

Several wildlife studies have shown that the presence of roads and OHV use adversely affect wildlife. In 1988, a study by Yarmoloy and others showed that radio collared mule deer disturbed by OHV use significantly altered their feeding and spatial-use behaviors. Researchers found that disturbed deer experienced reduced reproduction the following year.

There is also substantial evidence that high road densities in watersheds leads to degraded water quality and impaired fisheries. To improve fish and game habitat on the forest, Plumas Audubon recommends that user-created roads be closed and restored in State Game Refuges.

Response

The designation of a State Game Refuge on National Forest System Lands does not proclude the designation of OHV routes within the Refuge Boundary. In addition, unauthorized routes that are not included in the selected alternative will undergo passive restoration and are expected to revegetation and blend into the landscape over time. To date, the Plumas NF has not received any concerns by the California Department of Fish & Game regarding the designation of routes within the three state game refuges (Mt. Hough, Dixie Mountain, Smith Peak) on the Plumas.

The study by Yarmoloy, C; Bayer, M and C. Geist, 1988 was considered and reviewed but not used in the analysis effects for Deer. The study used a small sample size, 5 deer, and intentionally harassed deer for a period of 15 days. Although the study did show decreases in reproduction, the PNF biologist felt that the intentional harassment on such a small sample size for a concentrated period of time is not reflective of the conditions that would occur on the Plumas NF, therefore the biologist felt this study was not comparable to conditions that would occur under a recreation setting on the Plumas NF. In place of Yarmoloy, et al, the Plumas NF used the 1991 study by Kight and Cole, 1991, even though Knight and Cole reference the Yarmoloy et al study in their paper.

Comment 8

Action: Beckwourth District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located in State Game Refuges and are recommended for closure.

Beckwourth Ranger District
U8955 Dixie Mountain State Game Refuge
U7126 Dixie Mountain State Game Refuge
U7288 Dixie Mountain State Game Refuge
U7287 Dixie Mountain State Game Refuge
U7284 Dixie Mountain State Game Refuge
U7285 Dixie Mountain State Game Refuge
U7283 Dixie Mountain State Game Refuge
U8944 Dixie Mountain State Game Refuge
U7321 Dixie Mountain State Game Refuge
U7314 Dixie Mountain State Game Refuge
0.3 acre OHV use area Dixie Mountain State Game Refuge
U7315 Dixie Mountain State Game Refuge
U7316 Dixie Mountain State Game Refuge
U8877 Dixie Mountain State Game Refuge
U7403 Dixie Mountain State Game Refuge
U7404 Dixie Mountain State Game Refuge
U7401 Dixie Mountain State Game Refuge
0.2 acre OHV use area Dixie Mountain State Game Refuge
0.5 acre OHV use area Dixie Mountain State Game Refuge
U7402 Dixie Mountain State Game Refuge
U7405 Dixie Mountain State Game Refuge
U7303 Dixie Mountain State Game Refuge
U7355 Dixie Mountain State Game Refuge
U7398 Dixie Mountain State Game Refuge
U7399 Dixie Mountain State Game Refuge
U7477 Dixie Mountain State Game Refuge
U6812 Dixie Mountain State Game Refuge
U8228 Dixie Mountain State Game Refuge
U8220 Dixie Mountain State Game Refuge
U8218 Dixie Mountain State Game Refuge
U7?32 Dixie Mountain State Game Refuge
U7490 Dixie Mountain State Game Refuge
U7489 Dixie Mountain State Game Refuge
U7490 Dixie Mountain State Game Refuge
U7489 Dixie Mountain State Game Refuge
U7493 Dixie Mountain State Game Refuge
U7483 Dixie Mountain State Game Refuge
U7476 Dixie Mountain State Game Refuge
U8013 Dixie Mountain State Game Refuge
U7474 Dixie Mountain State Game Refuge
U7475 Dixie Mountain State Game Refuge
U6805 Dixie Mountain State Game Refuge
U7114 Dixie Mountain State Game Refuge
U7115 Dixie Mountain State Game Refuge
U7110 Dixie Mountain State Game Refuge
U7121 Dixie Mountain State Game Refuge
U7122 Dixie Mountain State Game Refuge
U7119 Dixie Mountain State Game Refuge
U7120 Dixie Mountain State Game Refuge
U8191 Dixie Mountain State Game Refuge
U6814 Dixie Mountain State Game Refuge
U6813 Dixie Mountain State Game Refuge
U6810 Dixie Mountain State Game Refuge
U6809 Dixie Mountain State Game Refuge
U6812 Dixie Mountain State Game Refuge
U???? Smith Peak State Game Refuge (route to Prospect 6241 north of 24N07)
U6728 Smith Peak State Game Refuge
U6833 Smith Peak State Game Refuge
U6727 Smith Peak State Game Refuge
U6726 Smith Peak State Game Refuge
U6831 Smith Peak State Game Refuge
U8281 Smith Peak State Game Refuge
U???? Smith Peak State Game Refuge (route east of 23N21Y)
U6746 Smith Peak State Game Refuge
U8274 Smith Peak State Game Refuge
U6824 Smith Peak State Game Refuge
U6825 Smith Peak State Game Refuge
U6826 Smith Peak State Game Refuge
U6827 Smith Peak State Game Refuge
U6829 Smith Peak State Game Refuge
U6830 Smith Peak State Game Refuge

Response

The designation of a State Game Refuge on National Forest System Lands does not prohibit the designation of OHV routes by the Forest Service. In addition, unauthorized routes that are not included in the selected alternative will undergo passive restoration and are expected to revegetation and blend into the landscape over time. To date, the Plumas NF has not received any concerns by the California Department of Fish & Game regarding the designation of routes within the three state game refuges (Mt. Hough, Dixie Mountain, Smith Peak) on the Plumas.

Comment 9

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located in State Game Refuges and are recommended for closure.

Mount Hough Ranger District
U8874 Mount Hough State Game Refuge
U8849 Mount Hough State Game Refuge
U6305 Mount Hough State Game Refuge
U8875 Mount Hough State Game Refuge
U8875 Mount Hough State Game Refuge
U8144 Mount Hough State Game Refuge
U6450 Mount Hough State Game Refuge (proposed OHV trail)
U6449 Mount Hough State Game Refuge (proposed OHV trail)
U6452 Mount Hough State Game Refuge (proposed OHV trail)
U6342 Mount Hough State Game Refuge (proposed OHV trail)
U6453 Mount Hough State Game Refuge
U6454 Mount Hough State Game Refuge (proposed OHV trail)
U6455 Mount Hough State Game Refuge (proposed OHV trail)
U6451 Mount Hough State Game Refuge
U8838 Mount Hough State Game Refuge
U6343 Mount Hough State Game Refuge
U6303 Mount Hough State Game Refuge
U8144 Mount Hough State Game Refuge
U8848 Mount Hough State Game Refuge
U8873 Mount Hough State Game Refuge (proposed OHV trail)
U6345 Mount Hough State Game Refuge
U6346 Mount Hough State Game Refuge
U???? Mount Hough State Game Refuge (route connecting 25N73 & 25N19)
U8852 Mount Hough State Game Refuge
U6847 Mount Hough State Game Refuge
U8851 Mount Hough State Game Refuge
U8836 Mount Hough State Game Refuge
U6347 Mount Hough State Game Refuge
U7679 Mount Hough State Game Refuge
U7681 Mount Hough State Game Refuge (proposed OHV trail)
U7677 Mount Hough State Game Refuge
0.1 acre OHV use area Mount Hough State Game Refuge
U7676 Mount Hough State Game Refuge (proposed OHV trail)
U7678 Mount Hough State Game Refuge
U7675 Mount Hough State Game Refuge
U7680 Mount Hough State Game Refuge (proposed OHV trail)
U6350 Mount Hough State Game Refuge
U6349 Mount Hough State Game Refuge
U7679 Mount Hough State Game Refuge
U7682 Mount Hough State Game Refuge
U7673 Mount Hough State Game Refuge
U6347 Mount Hough State Game Refuge
U8852 Mount Hough State Game Refuge
U6304 Mount Hough State Game Refuge (proposed OHV trail)
U8833 Mount Hough State Game Refuge (proposed OHV trail)
U6348 Mount Hough State Game Refuge (proposed OHV trail)

Response

The designation of a State Game Refuge on National Forest System Lands does not prohibit the designation of OHV routes by the Forest Service. In addition, unauthorized routes that are not included in the selected alternative will undergo passive restoration and are expected to revegetation and blend into the landscape over time. To date, the Plumas NF has not received any concerns by the California Department of Fish & Game regarding the designation of routes within the three state game refuges (Mt. Hough, Dixie Mountain, Smith Peak) on the Plumas.

Comment 10

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Reduce road densities in critical wildlife linkage areas

The science of conservation biology has contributed significantly to understanding the need for wildlife corridors or linkage areas.

It is important for wildlife to have the ability to move seasonally between elevations. It is also important to have linkages that allow for the dispersal of individuals between subpopulations to maintain genetic diversity. Connectivity also improves the long-term viability of the larger meta-population by allowing for subpopulations to re-colonize if they are extirpated.

Wildlife corridors between core habitat areas are important to both sensitive wildlife and game species. Plumas Audubon recommends reducing road densities in critical wildlife linkage areas.

Response

The commenter does not provide any evidence or map of wildlife linkage areas that should be analyzed or that he/she has a concern with for us to consider or analyze between the draft and final EIS. In absence of critical wildlife linkage areas, The Plumas NF analyzed habitat fragmentation in the Wildlife Section of the DEIS and FEIS, and did consider road densities in its analysis. Road densities of 0 to >6 miles per sq. mi were used in analyzing effects to wildlife in relation to habitat security. In summary, the analysis looked at the concentration of routes and roads and their relationship to habitat security, essentially showing that the higher the concentration of routes/roads per sq mi the least secure the habitat is for wildlife, whether it be for foraging, reproduction or wildlife linkages. In contrast, the lower the concentration of routes/roads per sq mi, the more (higher) secure the habitat is for wildlife.

Comment 11

Action: Beckwourth District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located in critical wildlife linkage areas and are recommended for closure.

Beckwourth Ranger District
U9048 Nelson Creek (McRae Meadow)
0.2 acre OHV use area Nelson Creek (McRae Meadow)
0.2 acre OHV use area Nelson Creek (McRae Meadow)
0.2 acre OHV use area Nelson Creek (McRae Meadow)

Response

Due to resource concerns (e.g. wildlife), these routes were not proposed under alternatives 2-5. In those alternatives, over time, vegetation is expected to passively recover to reduce the localized effects to habitat and reduce their contributions to fragmentation in these areas of concern.

Comment 12

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located in critical wildlife linkage areas and are recommended for closure.

Feather River Ranger District
U9047 West Branch Nelson Creek
U5649 West Branch Nelson Creek

U9044 West Branch Nelson Creek
U9045 West Branch Nelson Creek
U5999 West Branch Nelson Creek
U6000 West Branch Nelson Creek
U6001 West Branch Nelson Creek
U6002 West Branch Nelson Creek
U6003 West Branch Nelson Creek
U6004 East Branch Nelson Creek
U6008 East Branch Nelson Creek
U6009 East Branch Nelson Creek
U6011 East Branch Nelson Creek
U6006 East Branch Nelson Creek
U6054 South Fork Poorman Creek
U6055 South Fork Poorman Creek

Response

The routes recommended by the commentor are listed only in Alternative 1. They do not appear in Altneratives 2-5. Therefore, effects to "critical wildlife linkage areas" assumed by the commentor are non-existent in Alternatives 2-5.

Comment 13

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located in critical wildlife linkage areas and are recommended for closure.

Mount Hough Ranger District
U6219 Bucks Creek
U6220 Bucks Creek
U5261 McFarland Ravine
U5266 McFarland Ravine
U5267 McFarland Ravine
U5268 McFarland Ravine
U5269 McFarland Ravine
U5270 McFarland Ravine
U5271 McFarland Ravine
U5273 McFarland Ravine
U5274 McFarland Ravine
U5275 McFarland Ravine
U5276 McFarland Ravine
U5266 McFarland Ravine
U5267 McFarland Ravine
U6111 Morrow Creek
U6116 Morrow Creek
U5272 Morrow Creek

Response

Due to resource concerns (e.g. wildlife), these routes were not proposed under alternatives 2-5. In those alternatives, over time, vegetation is expected to passively recover to reduce the localized effects to habitat and reduce their contributions to fragmentation in these areas of concern.

Comment 14

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Wetlands

Disposition: Resolved: Comment acknowledged; does not provide new information

Protect meadows, lakeshores, and streamside habitats from OHV impacts

Meadows, lakeshores, and streamside habitats are critical to the health of many wildlife populations. Because of their importance to wildlife, recreation impacts should be strictly managed in these unique areas.

The Forest Service has designated Vehicle Restricted Areas around some lakes on the forest. Plumas Audubon encourages the Plumas National Forest to take a more proactive approach in the protection of meadows, stream

sides, and lakeshores. It is much easier to protect an area from OHV encroachment than to restore it after OHV impacts occur.

Response

Alternatives 2-5 do not proposed to designate routes in designated Vehicle Restricted Areas on the Forest. In addition, meadows streamsides and lakeshores were analyzed in the DEIS and considered in relation to impacts from OHV use. Meadows were analyzed under the Terrestrial and Botanical Resources Sections of the DEIS. Streamside and Lakeshores were analyzed under the Soil & Water and Aquatics Sections of the DEIS.

Comment 15

Action: Beckwourth District

Resource(s): Wetlands, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located adjacent to meadows, lakeshores, or streamside habitats and are recommended for closure.

Beckwourth Ranger District
U7223 Squaw Valley
U8878 Squaw Valley
U8859 Squaw Valley
U8896 Squaw Valley
U8897 Squaw Valley
U7289 Squaw Valley
U7290 Squaw Valley
U7170 Squaw Valley
U7302 Last Chance Creek
U7234 Last Chance Creek
U7304 Last Chance Creek
U7305 Last Chance Creek
U7127 Last Chance Creek
U7306 Last Chance Creek
U7307 Last Chance Creek
U7308 Last Chance Creek
U7309 Last Chance Creek
U7310 Last Chance Creek
U7311 Last Chance Creek
U7312 Last Chance Creek
U7313 Last Chance Creek
U7414 Last Chance Creek
U7258 Last Chance Creek
U7259 Last Chance Creek
U7260 Last Chance Creek
U7262 Last Chance Creek
U7263 Last Chance Creek
U7266 Last Chance Creek
U7082 Last Chance Creek
0.7 acre OHV use area Last Chance Creek
U7803 Last Chance Creek
U6982 Last Chance Creek
U6983 Last Chance Creek
U7078 Last Chance Creek
U7012 Last Chance Creek
U7013 Last Chance Creek
U6999 Last Chance Creek
1.1 acre OHV use area Last Chance Creek
0.4 acre OHV use area Last Chance Creek
0.5 acre OHV use area Last Chance Creek
U6881 Red Clover Creek
0.8 acre OHV use area Red Clover Creek
0.6 acre OHV use area Red Clover Creek
U6882 Red Clover Creek
U6883 Red Clover Creek
0.5 acre OHV use area Red Clover Creek
U6884 Red Clover Creek
U6885 Red Clover Creek
0.2 acre OHV use area Red Clover Creek
U6886 Red Clover Creek
U7864 Red Clover Creek
U7865 Red Clover Creek
0.2 acre OHV use area Red Clover Creek

U7869 Red Clover Creek
U7734 Red Clover Creek
U7732 Red Clover Creek
U7733 Red Clover Creek
0.3 acre OHV use area Red Clover Creek
U7038 Red Clover Creek
U7036 Red Clover Creek

Response

Routes were evaluated for impacts to meadows, lakeshores and streamside habitat under Alternative 1. Not all routes mentioned by commentor are included in Alternatives 2-5.

Comment 16

Action: Feather River District

Resource(s): Wetlands, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located adjacent to meadows, lakeshores, or streamside habitats and are recommended for closure.

Feather River Ranger District
U6531 South Branch Middle Feather River
U8585 South Branch Middle Feather River
U6549 South Branch Middle Feather River
0.6 acre OHV use area South Branch Middle Feather River
U6550 South Branch Middle Feather River
U8409 South Branch Middle Feather River
U6534 South Branch Middle Feather River
U6535 South Branch Middle Feather River
U6536 South Branch Middle Feather River

Response

Routes were evaluated for impacts to meadows, lakeshores and streamside habitat under Alternative 1. Not all routes mentioned by commentor are included in Alternatives 2-5.

Comment 17

Action: Mount Hough District

Resource(s): Wetlands, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

The following routes are located adjacent to meadows, lakeshores, or streamside habitats and are recommended for closure.

Mount Hough Ranger District
U6402 Snake Lake (proposed OHV trail)
U6411 Snake Lake (proposed OHV trail)
U6505 Snake Lake
1.2 acre OHV use area Snake Lake
U6506 Snake Lake
U6507 Snake Lake
U5090 Snake Lake
U6409 Smith Lake
U???? Smith Lake Dam
U6355 Meadow Camp
U6356 Meadow Camp
1.5 acre OHV use area Meadow Camp
1.6 acre OHV use area Meadow Camp
U6365 Meadow Camp
U???? Access to confluence of Meadow Valley and Rock Creek
U5094 Rock Creek below confluence (proposed OHV trail)
0.6 OHV use area Rock Creek below confluence
U5081 Spanish Creek above Greens Flat
U5230 Red Clover Creek at Drum Bridge

0.3 OHV use area Red Clover Creek at Drum Bridge
0.8 OHV use area Red Clover Creek at Drum Bridge
U6873 Clearwater Creek
U6876 Red Clover Creek at Notson Bridge
U6877 Red Clover Creek at Notson Bridge
U6878 Red Clover Creek at Notson Bridge
0.4 acre OHV use area Red Clover Creek at Notson Bridge

Response

Routes were evaluated for impacts to meadows, lakeshores and streamside habitat under Alternative 1. Not all routes mentioned by commentor are included in Alternatives 2-5.

Comment 18

Action: Adequacy of Studies (Best Available Science)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

For most people, wildlife encounters enhance their recreational experience, regardless of their mode of travel. However, the notion that outdoor recreation has no impacts on fish and wildlife is no longer tenable.

Travel management decisions should be based on science, not rhetoric. Through our recommendations we hope to reduce recreation impacts on fish and wildlife and their habitat.

Response

The Plumas NF Travel Management EIS does not infer that outdoor recreation has no impacts on fish and wildlife. Impacts to fish and wildlife can be found in the Aquatic and Terrestrial wildlife sections of the EIS. In addition, the EIS includes a variety of scientific studies that have been done on motorized vehicle effects to wildlife which include noise, occupancy, disturbance and displacement to name a few. However, there are no scientific models or formulas that provide a definitive one size fits all criteria. That is why the EIS used the best available scientific information from a variety of studies conducted combined with professional experience and knowledge of ecological relationships in evaluating potential effects to species and their habitats.

Letter 235

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Trout Unlimited agrees with the opinion of the former Forest Service Chief Bosworth that unmanaged off-highway vehicle use is a "major threat" affecting our nation's forests and should be "one of the highest priorities for the

agency."

The OHV route designation process should be directed by current Forest Service policy, as well as certain regulatory mandates and the best peer-reviewed and objective ecological data available. The fundamentals of the Travel Management Rule revisions are Executive Orders 11644 (1972) and 11989 (1977). These Executive Orders explicitly state that the route designation process "will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands."

Comment 2

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS Ch. 1, Purpose and Need section

The designation of special use areas and motorized routes (roads and trails alike) should be in accordance with the following:

1) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.

2) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.

3) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

Response

The purpose and need for this project is in alignment with the comments. In making any limited changes to the National Forest Transportation System, the Plumas National Forest will be considering criteria contained in Subpart B of the Travel Management Rule as stated in the FEIS under the Purpose and Need section.

Comment 3

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

After reviewing the Draft Environmental Impact Statement (EIS) for Motorized Travel on the Plumas National Forest, Trout Unlimited can only support Alternative 3 with amended rules to add the strict wet seasonal restrictions. We strongly oppose adding an additional 478 existing unauthorized routes totaling 364 miles of roads to the Plumas National Forest transportation system. There are 107 miles of motorized system trails that currently exist on the PNF. In addition to motorized trails, there are also 4,120 miles of system roads on the PNF [that] are currently available for motorized use. Of the 4,120 miles, 3,484 miles are available for both street and non-street legal vehicles while the remaining 636 miles are available for street legal vehicles only. No new routes can be added to the system until the Plumas can establish, through a science-based approach, a minimum road system and cumulative watershed impact analysis. Alternative 3 is also the most cost effective.

Response

The 2005 Travel Management Rule, 36 CFR Section 212, Subpart B, provides for a system of NFTS roads, NFTS trails and areas on National Forest System lands that are designated for motor vehicle use. After roads, trails , and areas are designated, motor vehicle use off designated roads and trails and outside designated areas is prohibited by 36 CFR 261.13. Subpart B is intended to prevent resource damage caused by unmanaged motor vehicle use by the public. In accordance with national direction, implementation of Subpart B of the travel management rule for the Plumas National Forest is scheduled for completion in 2009. A substantial portion of known dispersed recreation activities are not typically located directly adjacent to existing NFTS roads or NFTS motorized trails. Some dispersed recreation activities depend on foot or horseback access, and some depend on motor vehicle access. These unauthorized "user-created" routes are not currently part of the NFTS. This decision will add user-identified routes that do not present resource issues to be added to the NFTS.

Comment 4

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Recreation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS, Ch.1, Background

We [Trout Unlimited] support the prohibition of widespread cross-country travel by motor vehicles. Without this prohibition, travel management on the Plumas National Forest would run contrary to the Executive Orders on the Use of Off-Road Vehicles on Public Lands, the Travel Management regulations, and the Sierra Nevada Forest Plan Amendment.

Response

The Forest is similarly concerned about the effects of cross-country travel on natural resources. As stated in Ch.1, Background, unmanaged motor vehicle use, particularly OHV use, has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Compaction and erosion are the primary effects of motor vehicle use on soils. Riparian areas and aquatic dependent species are particularly vulnerable to damage from motor vehicle use. Unmanaged recreation, including impacts from OHVs, is one of "Four Key Threats Facing the Nation's Forests and Grasslands." (USDA Forest Service, June 2004).

Comment 5

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Nationally, the number of OHV users has climbed sevenfold in the past 30 years, from approximately 5 million in 1972 to 36 million in 2000. This number now well exceeds 51 million today. Despite the rapid rate of growth in the sport, OHV users still represent only a small percentage (3 to 7 percent) of national forest visitors. Yet this relatively small number of users requires a disproportionate amount of management and tolerance from non-motorized visitors, as OHV use can degrade scenic, ecological, and social values far faster and more extensively than any other form of recreation. We [Trout Unlimited] urge you to protect the forest and its incredible resources for the rest of us to enjoy.

There is no question that this significant increase in OHV use calls for immediate management action by the PNF. With over 5 million registered OHV users in California alone, it is clear that a new motorized system must be established in order to protect forest resources, visitor experience, and recreation opportunities. The PNF travel management process should create a better-motorized travel system, one that minimizes impacts to natural resources, roadless backcountry, opportunities for quiet and solitude, and non-motorized visitor experiences. This process should not be used to simply add more designated routes to the system.

Response

The primary purpose of this project is to be in accordance with national direction, by implementation of Subpart B of the travel management rule. The addition of routes to the NFTS is an effort to bring into the NFTS those user created routes that will not cause resource damage.

Comment 6

Action: Other Forest Resource Uses (Firewood, Mushroom, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Confirmed in 2005, a Plumas National Forest study showed that over 34% of total forest users engaged in fishing, and almost 28% declared fishing as their primary reason to use the forest. This is the second highest use on the Plumas, second only to hiking. It is clear that the majority of visitors to the Plumas enjoy non-motorized recreation wish to keep this experience protected. Over 46% of forest users accessed the Plumas for primary non-motorized uses, including backpacking, fishing, hunting, hiking/walking, horseback riding, bicycling, and other non-motorized activities.

Based on the reported 667,600 public visits to the Plumas National Forest (PNF) during fiscal year 2005, 179,600 visits involved driving for pleasure, 10,700 visits involved the use of OHVs. Only 2,000 visits to the PNF recorded OHV as the primary activity. This number represents less than 1 percent of annual users to the Forest engage primarily in OHV, yet this relatively small number of users requires a disproportionate amount of management and

tolerance from non-motorized visitors, as OHV use can degrade scenic, ecological, and social values far faster and more extensively than any other form of recreation.

Trout Unlimited is not looking to shut motorized users out of National Forest land. To the contrary, we feel that in some cases, motorized access should be improved and even increased, and subsequently, in other cases it should be seasonally restricted and in further cases even prohibited. However, by almost any measure, certain uses of the public domain pose a greater threat to resource values – including fish and game – and visitor experiences than others, and off-highway vehicle use is one. All of this is decidedly dependent on impacts related to motorized use as we previously described.

Comment 7

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Citation: FEIS Maps

We [Trout Unlimited] highly object to designation of any OHV routes that would penetrate Inventoried Roadless Areas. The DEIS significantly conflicts with the 2006 petition from the State of California to the Secretary of Agriculture, requesting that 100% of all Inventoried Roadless Area's in California remain in their current condition. The California Attorney General and Governor of California just recently filed suit against the 4 Southern California National Forests because their forest plans allowed further road construction and oil development within IRAs. To avoid this same scenario, the Plumas might want to reconsider their intentions to allow new motorized trails admitted into their current system.

Response

The selected alternative will not have proposed trails added to the NFTS that occur in the Inventoried Roadless Area.

Comment 8

Action: Classification

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Trout Unlimited is in opposition to existing and proposed routes crossing any stream, whether perennial or seasonal, without sufficient infrastructure and law enforcement to prevent degradation of water quality and stream channel structure.

Response

Mitigations for soil and water resource impacts, described in Chapter 2 of the FEIS and prescribed in Appendix A, would provide sufficient infrastructure to prevent degradation of water quality and stream channel structure at stream crossings for proposed routes rated as "Moderate" or "High" for soil and water effects. Routes rated "Low" do not require mitigation at channel crossings.

Comment 9

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Wetlands

Disposition: Resolved: Other (SEE RESPONSE)

TU [Trout Unlimited] finds that the proposed action in the Draft EIS is insufficient in following the directives established by a handful of different laws and frameworks, most blatantly the Sierra Nevada Forest Plan Amendment (SNFPA) and Northwest Forest Plan (NWFP), which require, among other things:

1) A watershed analysis be completed that determines the influence of each road on Aquatic Conservation Strategy objectives, and that roads be designed to minimize impacts on riparian and aquatic resources, and that reconstructing unauthorized routes to bring them to NFTS standards in meadows or wetlands should therefore be avoided.

2) These standards and guidelines require the Forest Service to avoid road construction, reconstruction, and relocation in meadows and wetlands

3) Construction of new roads in wetlands is prohibited. Adding unauthorized routes to the NFTS in meadows or wetlands constitutes road construction, and should be avoided. Stream crossings are required to be designed to pass a 100-year flood and allow for passage of aquatic fauna.

Response

Clarification: The Plumas NF is not under the Direction of the Northwest Forest Plan (NWFP).

Applicable Standard and Guidelines applied to the Travel Management Project are addressed in each resource section of the FEIS. The commentor is assuming that road construction is part of the proposed action/alternatives. No new road construction, reconstruction or relocation is proposed in any of the alternatives being considered in the FEIS.

Comment 10

Action: Protecive Designation for Resources (e.g., Class 1 Air, AIZ, ROS, etc.)

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Soil and Water Resouce section of FEIS Ch. 3

There are specific resources within the PNF that TU [Trout Unlimited] would like to go on record as being of particular concern to us. Some of these resources have been left unaffected by the PNF DEIS, which TU applauds. Others, however, have been placed in serious jeopardy by the proposal. The entire list of these waters includes:

All intact Headwater areas, Middle Fork of the Feather River, North Fork Feather River, Lake Davis, Lake Almanor, Canyon Creek (North Fork Yuba), Mosquito Creek, Last Chance Creek, Little Last Chance Creek, East Branch North Fork of the Feather, Squaw Creek, Dixie Creek, Onion Creek, Bear Creek, Nelson Creek, Yellow Creek, Red Clover Creek, Little Grizzly Creek, Spanish Creek and Indian Creek.

Response

PNF is required to protect these headwater areas through compliance with the federal Clean Water Act, as administered by the California State Water Resources Control Board. See section 3.5.2 of the FEIS. Non-point pollution in these headwater areas would be controlled and downstream beneficial uses would be protected. The cumulative watershed effects analysis has determined that all action alternatives (2-5) would be beneficial at the analysis watershed scale. At the site-specific scale, for alternatives 4 and 5, no trails with adverse soil or water impacts that cannot be mitigated are proposed for addition to the NFTS.

Comment 11

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Inventoried Roadless Areas
In the DEIS, your second Significant Issues states:

1) The proposed addition of motorized trails to proposed citizen inventoried roadless areas (CIRAs) will adversely affect the roadless characteristics of these areas including opportunities for solitude, undisturbed landscapes and primitive, non-motorized recreation

Trout Unlimited cannot agree more. Sportsmen need more unspoiled backcountry, not less. There are six (6) agency inventoried roadless areas on the Plumas and a handful of citizen inventoried roadless areas. These large pieces of intact habitat are the last remaining vestiges of coldwater fish habitat on the Plumas, and their roadless character must be preserved. Of special importance to Trout Unlimited are the Middle Fork of the Feather River IRA and the Squaw Peak CIRA. Under no conditions should new routes be added that penetrate Agency Inventoried Roadless, Citizens' Proposed Wilderness or Semi-Primitive Non-motorized areas.

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 12

Action: Roads and Trails (incl. access general)

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Citation: FEIS Maps Alt. 3, 4, 5

Two of California's rarest native trout, the Paiute cutthroat and Golden trout, exist only in creeks that flow either in or out of Inventoried Roadless Areas. In 2007, TU [Trout Unlimited] conducted a statewide survey of California hunters and anglers, which found that sportsmen overwhelmingly prefer that IRAs remain roadless and free of additional motorized trails.

Response

The preferred alternative, Alternative 5, as well as Alternatives 3 and 4 do not have any proposed routes in Inventoried Roadless Areas (FEIS Maps, Alt 3, 4 and 5).

Comment 13

Action: Goals and Objectives/LRMP Consistency

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

All route designations must be consistent with Land and Resource Management Plans for each of the National Forests. Where the Forest Plan does not, however, specifically prohibit the use of motorized vehicles in agency inventoried roadless areas, we contend that these areas generally should not contain designated OHV routes.

Response

Alternative 3, 4 and the Preferred Alternative, Alternative 5, were developed to address concerns with routes in the Citizen-inventoried Roadless Areas. None of these alternatives have routes in the CIRA. Alternative 3 adds no new routes, Alternative 4 drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Alternative 5 is the same as Alternative 4, only it keeps the routes that were given a high rating, that require mitigation. Those routes will not be added to the MVUM until after the mitigation is complete.

Comment 14

Action: User Conflict

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The responsible National Forest officials are required to "minimize conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands." By definition, roadless areas afford a type of quiet and primitive recreation that cannot be found near roads. To allow OHV use in these areas would cause disproportionate conflict between quiet recreationists and OHV users and will risk precluding roadless areas from further consideration for Wilderness designation.

Comment 15

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Given that more than 47,000 miles of roads currently exist in California's National Forests, the remaining roadless lands possess rare and critical ecological values, and therefore should remain roadless.

Comment 16

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Executive Order on Invasive Species states that all federal agencies will use relevant programs and authorities to prevent the introduction of invasive species, and "not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species ... unless ... the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm." Given that roads and OHV's serve as corridors for exotic plant and disease invasion, and that invasion by exotic species is one of the four threats to the health of the National Forests identified by the Forest Service Chief, we [Trout Unlimited] believe that roadless areas should serve as refuges from motorized encroachment.

Comment 17

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

The Governor of California petitioned the Secretary of Agriculture in 2006 for permanent protection of all inventoried roadless areas because the "limitations on road construction and reconstruction would benefit fish and wildlife that use the lands in question and their habitat because roads have direct and indirect adverse impacts [including] ... disturbance to fish and wildlife from vehicular traffic; human activities such as poaching, pollution, and arson; and the introduction of invasive species that roads invite."

Intact Inventoried Roadless Areas harbor the best habitat available and are critical to the future of California's sporting legacy; therefore, Trout Unlimited does not support the Plumas National Forest DEIS for motorized travel, and seeks to prohibit any new non-system motorized trail or road from IRAs in the final EIS.

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 18

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Citizen Inventoried Roadless Areas/Boxer Legislation
The Plumas National Forest contains some very large portions of citizen inventoried roadless area. One of particular concern to us and in serious jeopardy is the Squaw Peak Citizens Roadless Area. There are numerous routes proposed in this CIR. After speaking with some members of the OHV community, as well as PNF ID team members, we [Trout Unlimited] feel that a compromise can be worked out to benefit all interested parties. TU proposes that level 3 route 28201 or "Squaw Queen Road" becomes open to mixed use in lieu of the proposed route additions to Squaw Peak CIR. This benefits the interests on both sides of this polarized planning process and ensures that this important headwater area is protected for fish and game values.

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural

resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 19

Action: Protecive Designation for Resources (e.g., Class 1 Air, AIZ, ROS, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Primitive and Semi-primitive Non-motorized Areas

Where these two Recreation Opportunity Spectrum (ROS) classes do not overlap with agency or citizen inventoried roadless areas, motorized recreation should not be permitted in these areas. Forest Plans and agency policy generally prohibit motorized use in these areas, but in situations where they do not expressly forbid OHV use, we [Trout Unlimited] believe that these areas should not contain designated OHV routes, being from this process or in future evaluations. OHV use conflicts with the objectives of primitive and semi-primitive non-motorized areas to provide isolation from the sights and sounds of humans, closeness to nature, tranquility, and self-reliance through the application of outdoor skills. These areas are generally high altitude headwater areas that are important to providing clean water supplies downstream for native and wild salmonid species.

Response

"Semi-primitive Non-motorized" contains "inventoried roadless area", "Wilderness" and the "Wild" portion of the Wild and Scenic River, none of which have routes proposed in them for the preferred alternative, Alternative 5, as well as Alternatives 3 and 4. In other words these issues were addressed in these three alternatives.

Comment 20

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Comment acknowledged; does not provide new information

Critical Salmonid Habitat

In the DEIS, your third Significant Issues states:

1)Many of the unauthorized routes proposed for addition to the NFTS as trails are poorly located and will cause adverse impacts to plants, wildlife, water quality, soils and other natural resources.

Therefore, Alternative 3 has the lowest impact to riparian resources and aquatic dependent species.

The Plumas National Forest has some of the best fishing opportunities in California. There are 1,000 miles of fishable moving water with over 100 lakes located within the Plumas jurisdiction; some of them are world famous waters. Lake Davis, the Middle and North Forks of the Feather River, Yellow Creek, Lake Almanor and Frenchman's Lake are some of the most popular and renowned.

Fishing opportunities increase dramatically when anglers choose to leave the beaten path in the Plumas National Forest, and these fishing experiences need protection, which is a large part of the Travel Management process. Simply put, not every fishery in the PNF should be easily accessed by a motorized vehicle, and if such access is granted through this process, we [Trout Unlimited] will most surely see decline in these backcountry fishing experiences.

Game warden presence is at an all time low here in the State of California. Per capita, California has the lowest number of game wardens nationwide. Conversely, California harbors the most native trout species of any one state in the country with eleven different species and subspecies (one being extinct; Bull Trout). We need to protect our invaluable resources in this state. Many of these native trout species are confined to creeks and headwater areas where they currently seek refuge from introduced and invasive predators and poor habitat conditions downstream. One flagrant way to compound the current warden situation in California and put our last remaining native trout species at an even greater risk is to open up the backcountry to more motorized use. With this motorized use comes added fishing pressure, poaching and most severely and impacting to native trout species, habitat loss.

There is a fine balance that has to be achieved between access, protection of the resource and quality fishing experience. As any angler knows, adjacent motorized use while fishing has the potential to detract from the angling experience in both social (desired experience outcomes) and ecological aspects (bank erosion, dust clouds, water degradation from stream crossings). Inappropriate and mismanaged angling can also directly affect fishery resources. Thus, access, especially easy access through motorized use is not appropriate for every fishery in the PNF, especially those located within IRAs and Citizen IRAs.

Response

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1).

Alternative 3 responds to non-motorized recreation interest in “Citizen Inventoried Roadless Areas (CIRAs)” proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 21

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Comment acknowledged; does not provide new information

The most important fisheries in the Plumas National Forest that the Travel Management Team should commit to protecting under all OHV route designation alternatives are:

Middle Fork of the Feather River – Wild Trout Water

The Wild and Scenic stretch of the Middle Fork of the Feather River (MFF) that flows through agency Inventoried Roadless Area provides the most unique angling experience in the Plumas National Forest. Not only can you fish for wild populations of native rainbow trout in this canyon setting, you can do it without the possibility of running across another angler. Exceptional fishing opportunities are found throughout this canyon stretch. The Pacific Crest Trail crossing is a place where many anglers choose to go because of its wilderness setting, large trout, and general access. This experience must be protected just the way it is today.

There are currently seven motorized access points to the Middle Fork Canyon. Trout Unlimited feels that these seven routes provide sufficient motorized access to the canyon. Additional motorized access will without question bring more anglers to the river and compromise both the wilderness fishing experience and the health of the fishery itself. TU must emphasize that the general lack of fishing pressure combined with exceptional habitat is what currently supports the exceptional angling opportunities in the MFF. Subsequently, TU asks that no new roads be constructed and no new non-system user created routes be admitted to access the Middle Fork of the Feather River Canyon.

Response

There are no proposed routes in the "Wild" portion of the Designated Wild and Scenic River. This is the area referred to in the comment that overlaps with the "Inventoried Roadless Area". The only routes being added are in the "Scenic" and "Recreation" portion of the Designated Wild and Scenic River. The 1988 Plumas Land and Resource Management Plan standards and guidelines for Rx-2 Wild and Scenic River Prescription in the "Scenic" are as follows: Construct campgrounds and other developments hwich enhance recreation use. To the extent possible, design and manage recreation developments (including access) to avoid areas of high fire hazard and to prevent ignition and spread of wildfire. Permit overnight use of undeveloped places. Establish and enforce occupancy rules as needed. The "Recreation" portion is as follows: Develop day-use recreation sites near the river according to the Recreation Zone Recreation Managemen Plan (2/15/80). In neither case does it expressly prohibit route designation, except in the "Wild" portion, which have no routes in the action alternatives.

Comment 22

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Comment acknowledged; does not provide new information

The most important fisheries in the Plumas National Forest that the Travel Management Team should commit to protecting under all OHV route designation alternatives are:

Nelson Creek – Wild Trout Water

Nelson Creek is a very important tributary to the Middle Fork of the Feather River. Nelson Creek provides suitable habitat for reproduction and recruitment of native and wild trout species in the MFF. This creek is one the main spawning habitats for fluvial fish in the main stem of the middle fork. Nelson Creek is also state designated wild trout heritage water. This resource is very special to anglers visiting Plumas County and it is a relatively untouched and undiscovered fishery. TU would like to keep it that way. There is a saying in the fishing community. It goes, "The easiest way to ruin a perfectly good trout stream is to open a fly shop near it. The second is to build a road to it." We strongly urge the Plumas National Forest to keep the Nelson Creek watershed intact by eliminating user created trails that will invariable lead to the creation of new motorized trails into the future. This is a wonderful resource that should be protected, both for its values as an important fishery for native rainbow trout and to preserve its candidacy for protection under the Wild and Scenic River Act.

Response

In an effort to maintain the scenic values and fisheries of the Nelson Creek area, the Forest did not propose any routes to access Nelson Creek. The nearest proposed routes to Nelson Creek are more than 0.5 miles from the Creek. The closest route in the preferred alternative, Alternative 5 is 0.75 miles away.

Comment 23

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Comment acknowledged; does not provide new information

The most important fisheries in the Plumas National Forest that the Travel Management Team should commit to protecting under all OHV route designation alternatives are:

Yellow Creek – Wild Trout Water

The lower most twelve miles of the stream from Big Springs to the North Fork Feather River is designated as a state wild trout stream. Special fishing regulations on both private and public land have been developed for a portion of the wild trout area to promote a trophy brown trout fishery. There are truly large wild fish in Yellow Creek, and it is hands down the best opportunity within the Plumas National Forest to fish for trophy wild brown trout in a spring creek setting. Yellow Creek flows from Lassen National Forest before it reaches private land and the Plumas National Forest. TU [Trout Unlimited] urges that no new road building projects be proposed near this meadow stream and that no new non-system user created routes be added to this area at any point in this NEPA process.

Response

Route 7M15 is proposed in alternatives 2,4,&5 and runs long a ridge above Yellow Creek about 1/2 mile away from the stream. There is a Lassen NF system road #26N49 that runs inbetween the proposed route 7M15 and Yellow creek, This route has been reviewed by the IDT and as exhibited in appendix A of the FEIS, it was found to have a low inpact on all resources.

Comment 24

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Comment acknowledged; does not provide new information

The most important fisheries in the Plumas National Forest that the Travel Management Team should commit to protecting under all OHV route designation alternatives are:

East Branch North Fork and Headwaters – (Spanish Creek, Indian Creek, Red Clover Creek, Little Grizzly Creek, Squaw Creek, Last Chance Creek)

See Appendix A for specific route closures.

Response

Concerns to Fisheries and Aquatics were evaluated in a lengthy process as a interdisciplinary team, route by route. All these routes have been evaluated and given a "effects" determination from Low to Extreme (note: definition of these values can be found on the last page of appendix A in the FEIS. For these proposed trails, the route assessments in appendix A identifies the number of miles of each trail, effects determinations by resource and any mitigation measures (including the season when the trail would be open, and any mitigation measures that would be implemented on the trail prior to publication on a MVYM and allowing public use. Trails with an asterisk (*) after the trail number would need mitigation completed prior to being added to the MVUM and used by the public. Included in the process was review of field survey completed on each of the 410 miles of trails in the action alternatives, and any trail found to have a moderate to high determination will be mitigated to reduce sedimentation into the streams.

Comment 25

Action: Do not add more mileage/or do decrease existing mileage

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Comment acknowledged; does not provide new information

The most important fisheries in the Plumas National Forest that the Travel Management Team should commit to protecting under all OHV route designation alternatives are:

Little Last Chance Creek

Little Last Chance Creek (LLCC) provides the in flow and out flow for Frenchman Reservoir. This creek is also the main source of recruitment for wild fish reproduction and recruitment in the lake (CDFG does actively stock Frenchman Res.). The current management of cattle grazing in the headwaters of Little Last Chance Creek is TU [Trout Unlimited] largest concern at the moment. Unmanaged OHV use comes in a very close second. This meadow stream has undergone large habitat restoration work by the CRM and Feather River Trout Unlimited. The PNF must keep OHVs out of the LLCC meadow and strongly reject any consideration to add additional motorized routes within or adjacent to it. Decommissioning user created routes in this area is the easiest way to show your appreciation to local conservation efforts while protecting their investment and encouraging future participation in forest management.

Trout Unlimited looks forward to working with the Travel Management team to reduce any impacts to these watersheds during this motorized route designation process

Response

Concerns to Fisheries and Aquatics were evaluated in a lengthy process as a interdisciplinary team, route by route. All these routes have been evaluated and given a "effects" determination from Low to Extreme (note: definition of these values can be found on the last page of appendix A in the FEIS. For these proposed trails, the route assessments in appendix A identifies the number of miles of each trail, effects determinations by resource and any mitigation measures (including the season when the trail would be open, and any mitigation measures that would be implemented on the trail prior to publication on a MVYM and allowing public use. Trails with an asterisk (*) after the trail number would need mitigation completed prior to being added to the MVUM and used by the public. Included in the process was review of field survey completed on each of the 410 miles of trails in the action alternatives, and any trail found to have a moderate to high determination will be mitigated to reduce sedimentation into the streams.

All routes have been removed from crossing meadow systems, and the Forest would appreciate working with Trout Unlimited to develop site specific mitigations across the Forest on any routes proposed that have been identified to be mitigated.

Comment 26

Action: Adequacy of Studies (Best Available Science)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Mule Deer

The DEIS cites a well-accepted habitat effectiveness model that determined mule deer habitat effectiveness declined by 50-95% at road densities of 6 miles/section (p. 228). Because the Plumas NF fails to consider existing roads in its modeling, the DEIS analysis of the direct and cumulative effects of its Travel Management alternatives on mule deer is meaningless and useless.

The analysis of impacts to mule deer from the Travel Management Plan is based on a comparison of "open unauthorized routes," "existing" and "proposed trail densities" in the five alternatives. It attempts to compare alternatives by comparing densities of existing and proposed trails, but those comparisons, on their own, are

meaningless. Without knowing the total traffic density, it is not possible to assess the impact on deer habitat. Even the cumulative impacts analysis omits this essential data. NEPA's interest is not in comparing alternatives for the sake of comparing alternatives; the point is to disclose impacts of each alternative and then make an informed choice from among them. The information provided in this DEIS is insufficient for either the public or the decision-maker to make that informed choice.

The DEIS recognizes the importance of restricting motorized vehicle access within certain deer habitat areas (p.230). It is not clear what the Diamond Mountain Closure's intent is. The closure is during deer season, so it is apparently not for fawning or winter range. The DEIS recognizes the importance of key summer fawning and critical winter ranges, but does not appear to require seasonal closures to protect fawning or wintering deer. Given the steep decline in mule deer numbers in the region over recent years, maximum protection should be provided for mule deer habitat, especially critical winter and fawning areas.

Response

Existing Roads and road densities have been factored into the Cumulative effects section for Mule Deer (see FEIS, Table 98, page 268), contrary to the commenters claim. The well accepted habitat effectiveness model mentioned by the commentor does consider roads in its development of road densities and habitat effectiveness (High Security, Moderate Security and Low Security).

The mention of the Diamond Mountain Closure in the FEIS is too simply state that it will continue under all the action alternatives. (See FEIS, page 259). The text of the FEIS clearly states that the reason for the closure was due to the high volume of vehicles in the Diamond Mountain area during deer season.

The Plumas NF does recognize the importance of fawning habitat and critical winter range and seasonal closures, not to mention dropping of routes from alternatives. There is currently no routes proposed for designation in known, mapped fawning habitat on the Plumas NF. Also, the following routes were dropped from consideration in critical winter range; 10M20B, 10M21C, 10M35 and 10M36A, from winter range; 9M59A, 9M59C, 9M59D, and 9M59E, and from summer range; 10M33.

Comment 27

Action: Cumulative/Combined Effects

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Cumulative effects

According to a joint study involving the Forest Service, California Department of Fish and Game and the Bureau of land Management, which looked at declining mule deer populations throughout California, Deer Unit 3 (DU 3), including the Plumas National Forest, suffered the state's second largest decline, from 40,000 in 1992 to 10,000 in 1996. The EIS must disclose this fact and an analysis of the reasons behind this decline. It must also disclose what the Forest is doing and/or plans to do to mitigate these huge losses.

The DEIS does not include a discussion of the cumulative impacts from herbicide treatments, or the effects of invasive noxious weeds. Both of these are common in Sierra Forests and are likely contributing to the impacts on mule deer habitat on the Plumas NF.

Noxious weeds are spread by vehicles and further contribute to the loss of deer habitat. The cumulative impacts analysis must include a discussion of how all the individual impacts contribute to the decline in deer habitat and numbers, which of these impacts can be avoided and/or mitigated.

Response

Deer Unit 3 (known as DAU 3 by the Plumas NF) was changed by the California Department of Fish & Game to DAU 10 in 2003. Based on CDFG, 2003 data, most notably eastside deer populations (DAU 9, 10) occupying great basin habitats experienced significant declines during 1990-1996. However these populations have appeared to have stabilized based on recent trend estimates (DFG, 2003).

The Plumas NF is not currently implementing herbicide treatments for Noxious Weeds. Although the Plumas NF has noxious weed occurrences on the Forest, those occurrences are relatively small and do not pose a threat to deer habitat nor are the occurrences on the Plumas NF contributing to declines in deer numbers at this time.

Comment 28

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Given the proposed alternatives, Alternative 3, with the addition of a seasonal closure, best meets the needs of ungulates on the Plumas NF.

Comment 29

Action: Seasonal Closures

Resource(s): Multiple

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS, Ch. 1, Ch. 2.--Mitigations, Ch.3 Soils and Water Resources--Season of Use Mitigations, Appendix A.

Seasonal Closures

Seasonal closures of unpaved roads and trails during winter months (wet weather) and/or during peak game migration periods is critical to reduce erosion and sedimentation, maintenance costs, and disturbance of wildlife.

Enforcing seasonal closures will be paramount to protect the important meadow systems of the upper Feather River drainage.

The PNF should integrate seasonal closures to reduce inter-user conflicts, minimize temporal and inter-site displacements, and protect the condition of motorized routes.

Response

On the Feather River Ranger District there are two areas, Flea Mountain and French Creek Basin, where a wet season closure is needed below 4,000 feet in elevation. A wet season closure is a project designed mitigation measure for protecting native surfaced roads and trails that are susceptible to rutting and soil erosion. The season of use is shown in Table 1 and Appendix A. To facilitate a standard that can be implemented across the Forest at identified routes, the general Limited Operating Period (LOP) is from April to May1st through January 1st. A Forest Order will be utilized to restrict season of use as necessary.

Comment 30

Action: Enforcement/Funding/Staffing

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS, Ch.3, Transportation Facilities--Environmental Consequences

Budget for Transportation System and Administration

Both Subparts A and B of the Travel Management regulations address the affordability of the Forest transportation system. Subpart A requires the Forest to determine the minimum system needed to "reflect long-term funding expectations." Subpart B requires the Forest to "consider effects on...the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration." The Forest Service Manual further states, "[[a]]dministrative units and ranger districts should avoid adding routes to the forest transportation system unless there is adequate provision for their maintenance."

The current road inventory for the Plumas National Forest is 4,137 miles. According to the DEIS, the annual maintenance cost of the road system is $2,369,215. Yet the Plumas NF expects to receive only $1,900,000 per year in maintenance funds. The annual shortfall is $469,000. The Forest states that the shortfall means that some roads are not maintained on schedule and scheduled maintenance is completed only on the roads with the most use.

The Plumas NF expects to receive $25,000 in Forest Service appropriated funds for motorized trail maintenance. Trail maintenance money has been declining each year, according top the DEIS. Yet the preferred alternative would designate a motorized trail system of 381 miles, which would cost $70,000 annually to maintain. The annual shortfall would be $45,000. Alternative 3, however, would only cost $26,000 per year.

There is simply no justification for designating new routes when the Forest has such a significant maintenance backlog. Unmaintained and degraded roads, when open to motor vehicle use, may lead to substantial erosion, may collapse, and may cause serious safety problems.

The analysis of affordability in the DEIS does not address how the Forest will reduce the maintenance backlog or even how they will prevent the increase of a maintenance backlog. In fact, the proposed action has the second largest maintenance cost of any Alternative. The Forest needs to explain how they will reduce the maintenance backlog or admit that they are further contributing to it.

The Forest attempts to justify the inclusion of new routes by saying that trails added to the system would be maintained thereby reducing the amount of damage inflicted on other resources, as opposed to those alternatives where fewer new routes are designated. This argument is spurious for two reasons: 1) the Forest has no funds to maintain these new trails and 2) unmaintained trails that are open to motor vehicle use will cause more resource damage than unmaintained trails that are closed to motor vehicles and allowed to heal naturally.

The Forest should follow the handbook guidelines and not open any new routes that it cannot afford to maintain.

Response

The assumption, as explained in the Transportation Environmental Consequences section, is that the cost to implement the proposed action will be covered by obtaining grant funding and through volunteer labor.

Comment 31

Action: Volunteer Groups and Partnerships

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Future Opportunities

Trout Unlimited understands that Travel Management merely signifies the start of a long process; creating a new and better motorized system on the Plumas. In many cases, subpart B of the Travel Management rule is seen as a temporary fix to "stop the bleeding of impacts caused by unmanaged OHV use." After subpart B is addressed and the final Record of Decision is implemented, TU truly encourages the Plumas stepping forward to address subpart A of the Travel Management rule. This will ensure that a minimum trail system is established through a science based cumulative watershed impact analysis, which will more thoroughly address budgetary, resource and recreation concerns.

Trout Unlimited has its roots in local, grassroots restoration work to improve and protect coldwater fishing resources. Based on the final Record of Decision, we are looking forward to working with the Plumas to pursue funding sources and provide volunteers to restore specific decommissioned routes. We are also looking forward towards working with Plumas staff to identify potential problematic routes that are included in the final ROD [Record of Decision], but do not meet concerns addressed in both subpart A and B of the Travel Management Rule.

Trout Unlimited anticipates a collection of both user created and system trails will need decommissioning and restoration in the years to come "post-Travel Management." Poorly constructed and maintained roads are one of many threats to water quality affecting fishing opportunities, and we look forward to working together to address this issue and protect the important coldwater resources and native trout on the Plumas.

Response

The Forest is very grateful to cooperators such as yourselves and looks forward to working in partnership with you in the future.

Comment 32

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Trout Unlimited expects to see a final Record of Decision that considers all factors mentioned within this public comment letter so that OHV use can be managed in a proper way to protect critical forest resources while providing a recreational experience.

Comment 33

Action: Mount Hough District

Resource(s): Air Quality and Noise, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 11M18A, Reason for Closure: AIR, Ranger District: Mount Hough

Response

11M18A in on the top of Grizzly Ridge were ridge top air movement will mix any vehicle air pollution.

Comment 34

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 10E05, Reason for Closure: CSH Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 10M03, Reason for Closure: CSH Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 10M04, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 35

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 10M11, Reason for Closure: AIR/CIR (Critical Salmonid Habitat), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 36

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 10M06, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 37

Action: Beckwourth District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 11M03, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Beckwourth
Route ID: 11M04, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Beckwourth
Route ID: 12M01A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Beckwourth

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 38

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 12M21, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 12M22 , Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 12M23, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 12M25, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 12M26, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 12M27, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 39

Action: Beckwourth District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 13M25, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Beckwourth
Route ID: 13M26, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Beckwourth
Route ID: 13M27, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Beckwourth

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 40

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 5M08, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 5M09, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 5M10, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M03, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M04, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M08, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M09, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M10, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M12, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M13, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M14, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M14A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M15, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M16A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M16B, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 7M12, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 41

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 7M13, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 7M14, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 8M10, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 8M11A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 8M16, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 8M17, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 8M23, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 42

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 9M02, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M03, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M04, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M08, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M08A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M10, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M11, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M12, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M13, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M14, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M14A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M15, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M16, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M16A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M17, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M19, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M20, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M21, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M22, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 9M23, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 43

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 9M32, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough

Route ID: 9M32A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 12M19, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 44

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 5M11, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 5M13, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 5M17, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M11, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 8M01, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 8M19, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 9M37A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 8M13, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 6M16, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M02, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M05, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River
Route ID: 6M06, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 45

Action: Beckwourth District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 16M04A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Beckwourth

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 46

Action: Feather River District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 7M11, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 47

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 8M04, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 48

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 10M01, Reason for Closure: CSH (Critical Salmonid Habitat)/WSR (Wild and Scenic River (propsed existing)), Ranger District: Feather River

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 49

Action: Beckwourth District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendix H of the Soil and Water Resource Report

Route ID: 11M09, Reason for Closure: WSR (Wild and Scenic River (propsed existing)), Ranger District: Beckwourth

Response

11M09 is rated “high” for soil and water resource effects. Sedimentation to a stream channel was observed but can be mitigated. See Appendix H of the Soil and Water Resource Report. Following mitigation, no adverse soil or water effects to the Wild and Scenic River Corridor of the Middle Fork Feather River would exist due to the proposed trail. This route is also in the "Recreation" portion of the WSR and therefore route designation is allowed under the 1988 Plumas Land and Resource Management Plan.

Comment 50

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 11M13, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 1M13A, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M13B, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M13C, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M13D, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M14, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M15, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M15A, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M16, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 11M17, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 12M09, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 12M09A, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 51

Action: Beckwourth District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 12M10, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 52

Action: Feather River District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 12M10A, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 12M11, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 53

Action: Beckwourth District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 12M12, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 13M10, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 13M10A, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 13M10B, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 13M11, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 14M05, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 14M06, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 14M09, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth
Route ID: 15M05, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural

resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 54

Action: Action not Specified

Resource(s): Site Specific, Multiple

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Route ID: 11M18, Reason for Closure: CIR (Citizen Inventoried Roadless Areas)/AIR, Ranger District: Mount Hough

Response

This trail has been dropped from Alternative 4.

Comment 55

Action: Beckwourth District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 15M01, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth

Response

Due to concerns about TES plants, this route was dropped from the preferred alternative, Alternative 5, as well as Alternatives 3 and 4.

Comment 56

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 12M29, Reason for Closure: CIR (Citizen Inventoried Roadless Areas) /CSH (Critical Salmonid Habitat), Ranger District: Mount Hough

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 57

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 15M03, Reason for Closure: CIR (Citizen Inventoried Roadless Areas) /CSH (Critical Salmonid Habitat), Ranger District: Beckwourth
Route ID: 15M04, Reason for Closure: CIR (Citizen Inventoried Roadless Areas)/CSH (Critical Salmonid Habitat), Ranger District: Beckwourth
Route ID: 17M05, Reason for Closure: CIR (Citizen Inventoried Roadless Areas) /CSH (Critical Salmonid Habitat), Ranger District: Beckwourth

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 58

Action: Feather River District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 10M09, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Feather River

Response

Route 10M09 was dropped from the preferred alternative, Alternative 5 as well as Alternatives 4 and 5 because it was found to be non-existent (Appendix A).

Comment 59

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 12M16, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough
Route ID: 10M32, Reason for Closure: CIR (Citizen Inventoried Roadless Areas), Ranger District: Mount Hough

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 60

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 13M10, Reason for Closure: CIR (Citizen Inventoried Roadless Areas)/MM (Monane meadow), Ranger District: Beckwourth

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Comment 61

Action: Mount Hough District

Resource(s): Wildlife and Wildlife Habitat (No TESS), Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 9M42, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 9M42A, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough
Route ID: 9M42B, Reason for Closure: CSH (Critical Salmonid Habitat), Ranger District: Mount Hough

Response

The Plumas NF has no designated Critical Salmonid Habitat (refer to NOAA website).

Comment 62

Action: Beckwourth District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendix H of the Soil and Water Resource Report

Route ID: 12M04, Reason for Closure: WSR (Wild and Scenic River (proposed Existing)), Ranger District: Beckwourth

Response

12M04 is rated “moderate” for soil and water resource effects. See Appendix H of the Soil and Water Resource Report. The FEIS analysis has determined that no adverse soil or water effects to the Wild and Scenic River Corridor of the Middle Fork Feather River exist due to the proposed trail.

Comment 63

Action: Mount Hough District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendix G of the Soil and Water Resource Report

Route ID: 11M08, Reason for Closure: WSR (Wild and Scenic River (proposed Existing)), Ranger District: Mount Hough

Response

11M08 is rated “high” for soil and water resource effects. Potential adverse effects due to a steep trail segment and the existing stream crossing can be mitigated. See Appendix G of the Soil and Water Resource Report. Following mitigation, no adverse soil or water effects to the Wild and Scenic River Corridor of the Middle Fork Feather River would exist due to the proposed trail.

Comment 64

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 10M13, Reason for Closure: WSR (Wild and Scenic River (proposed Existing))/CIR (Citizen Inventoried Roadless Areas), Ranger District: Beckwourth

Response

Route 10M13 is a short spur off of County Rd. 120 near Red Bridge. This route is in the "Scenic" portion of the WSR and therefore route designation is allowed under the 1988 Plumas Land and Resource Management Plan.

Comment 65

Action: Feather River District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 22N83YA, Reason for Closure: IRA (Inventoried Roadless Area), Ranger District: Feather River

Response

Route 22N83YA is part of the NFTS, and therefore will not be analyzed with this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 66

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 24N89X, Reason for Closure: IRA (Inventoried Roadless Area), Ranger District: Mount Hough

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 67

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 26N26C, Reason for Closure: IRA (Inventoried Roadless Area)/CIR (Citizen-Inventoried roadless area), Ranger District: Mount Hough
Route ID: 8M07, Reason for Closure: IRA (Inventoried Roadless Area)/CIR (Citizen-Inventoried roadless area)Mount Hough PNM

Response

Route 26N26C is part of the NFTS already and is not being analyzed in this decision. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline.

Route 8M07 is an existing route on the NFTS, as such it will not be analyzed as part of this effort.

Comment 68

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 21N25A, Reason for Closure: IRA(Inventoried Roadless Area)/CIR (Citizen-Inventoried roadless area)/(Primitive Non-motorized)/WSR (Wild and Scenic River (proposed or existing)), Ranger District: Feather River
Route ID: 23N24, Reason for Closure: IRA (Inventoried Roadless Area)/CIR (Citizen-Inventoried roadless area)/PNM (Primitive Non-motorized)/WSR (Wild and Scenic River (proposed or existing)), Ranger District: Feather River

Response

Routes 21N25A and 23N24 are part of the NFTS and therefore will not be analyzed in this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 69

Action: Beckwourth District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 23N88Y.1, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Beckwourth

Response

Route 23N88Y.1 is part of the NFTS, and therefore will not be analyzed with this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 70

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 24N35, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough
Route ID: 24N89XA, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough

Response

Routes 24N35 and 24N89XA are part of the NFTS and therefore will not be analyzed in this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 71

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 25N42A, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Beckwourth

Response

Route 25N42A is part of the NFTS and therefore will not be analyzed in this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 72

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 26N10, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough
Route ID: 26N42, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough 2

Response

Route 26N10 and 26N42 are part of the NFTS and therefore will not be analyzed in this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 73

Action: Beckwourth District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 6N48, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Beckwourth

Response

This route number does not appear to be part of this effort. It is not in any of the alternatives, nor is it in the NFTS. This maybe an error on the part of the individual(s) commenting.

Comment 74

Action: Mount Hough District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 27N10A, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough
Route ID: 27N10A1, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough
Route ID: 27N10A2, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough
Route ID: 29N43F, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough
Route ID: 26N10A, Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Mount Hough

Response

These routes are part of the NFTS, as such they are not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 75

Action: Feather River District

Resource(s): Land Designation and Management, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 21N23YA , Reason for Closure: CIR (Citizen-inventoried roadless areas), Ranger District: Feather River

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need

decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 76

Action: Beckwourth District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 28N02F, Reason for Closure: CIR (Citizen-inventoried roadless areas)/PNM (Primitive Non-motorized), Ranger District: Beckwourth

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 77

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 28N14, Reason for Closure: CIR(Citizen-inventoried roadless areas)/PNM (Primitive Non-motorized), Ranger District: Mount Hough

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 78

Action: Beckwourth District

Resource(s): Wetlands, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 10M08, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 22N16, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth

Route ID: 23N91Y, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 24N10, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 24N74Y, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 26N04, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 26N07, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 26N11, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 26N35, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth
Route ID: 26N82, Reason for Closure: MM (Montane meadow), Ranger District: Beckwourth

Response

For a Discussion on Meadow habitat, please see the Willow Flycatcher section and the Great Gray Owl section in the Terrestrial Wildlife Analysis Section of the FEIS.

Comment 79

Action: Mount Hough District

Resource(s): Wetlands, Site Specific

Disposition: Resolved: Other (SEE RESPONSE)

Route ID: 28N03, Reason for Closure: MM (Montane meadow), Ranger District: Mount Hough
Route ID: 28N19A, Reason for Closure: MM (Montane meadow), Ranger District: Mount Hough

Response

For a Discussion on Meadow habitat, please see the Willow Flycatcher section and the Great Gray Owl section in the Terrestrial Wildlife Analysis Section of the FEIS.

Comment 80

Action: Feather River District

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 22N29L, Reason for Closure: PNM (Primitive Non-motorized), Ranger District: Feather River
Route ID: 22N42Y, Reason for Closure: PNM (Primitive Non-motorized), Ranger District: Feather River
Route ID: 23N45X1, Reason for Closure: PNM (Primitive Non-motorized), Ranger District: Feather River

Response

These routes are part of the NFTS, as such they are not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 81

Action: Mount Hough District

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 29N99, Reason for Closure: PNM (Primitive Non-motorized), Ranger District: Mount Hough

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 82

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 25N18, Reason for Closure: IRA (Inventoried Roadless Area)/PNM (Primitive Non-motorized), Ranger District: Mount Hough

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 83

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 20N59, Reason for Closure: IRA (Inventoried Roadless Area)/PNM (Primitive Non-motorized), Ranger District: Feather River
Route ID: 21N71A, Reason for Closure: IRA (Inventoried Roadless Area)/PNM (Primitive Non-motorized), Ranger District: Feather River

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA

process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 84

Action: Mount Hough District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 24N26B, Reason for Closure: IRA (Inventoried Roadless Area)/PNM (Primitive Non-motorized), Ranger District: Mount Hough

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 85

Action: Feather River District

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 21N27YA, Reason for Closure: PNM (Primitive Non-motorized), Ranger District: Feather River
Route ID: 22N08X, Reason for Closure: PNM (Primitive Non-motorized), Ranger District: Feather River
Route ID: 21N25J, Reason for Closure: PNM (Primitive Non-motorized), Ranger District: Feather River

Response

This route is part of the NFTS, as such it is not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 86

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 8M05 Reason for Closure: PNM (Primitive Non-motorized)/WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River

Response

Route 8M05 is an existing route on the NFTS, as such it will not be analyzed as part of this effort.

Comment 87

Action: Feather River District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Ch. 1 and Appendix A of FEIS

Route ID: 10M05, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River
Route ID: 10M05A, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River
Route ID: 20N06, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River
Route ID: 20N16, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River
Route ID: 20N35, Reason for Closure: WSR(Wild and Scenic River (proposed or existing)), Range District: Feather River
Route ID: 20N61 , Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River
Route ID: 20N95, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River
Route ID: 21N32, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River

Response

Existing, unauthorized routes 10M05 and 10M05A are not proposed for addition to the NFTS under any of the project alternatives. All action alternatives (2-5) would prohibit motorized traffic on these routes. See Appendix A of the FEIS. Closure of existing NFTS system roads, and evaluation of the condition of existing NFTS system roads, is not part of the purpose and need for this project. See Ch. 1 of the FEIS.

Comment 88

Action: Beckwourth District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Ch. 1 of the FEIS

Route ID: 23N03Y, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Beckwourth
Route ID: 23N03YA , Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Beckwourth
Route ID: 23N03YB, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Beckwourth

Response

Closure of existing NFTS system roads, and evaluation of the condition of existing NFTS system roads, is not part of the purpose and need for this project. See Ch. 1 of the FEIS.

Comment 89

Action: Mount Hough District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Ch. 1 of the FEIS

Route ID: 23N22A, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Mount Hough
Route ID: 23N22F, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Mount Hough
Route ID: 23N92A, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Mount Hough

Response

These routes are part of the NFTS, as such they are not part of this effort. The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 90

Action: Feather River District

Resource(s): Water Resources, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: SC900, Reason for Closure: WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River

Response

Route SC900 is an existing route on the NFTS, as such it is not being analyzed in this effort.

Comment 91

Action: Feather River District

Resource(s): Site Specific, Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Route ID: 8M06, Reason for Closure: PNM (Primitive Non-motorized)/CIR (Citizen-inventoried roadless area)/WSR (Wild and Scenic River (proposed or existing)), Range District: Feather River

Response

Route 8M06 is an existing route on the NFTS, as such it will not be analyzed as part of this effort.

Comment 92

Action: Roads and Trails (incl. access general)

Resource(s): Fisheries/Aquatics

Disposition: Resolved: Comment acknowledged; does not provide new information

Roads are known to cause displacement and stress on large ungulates; keeping IRAs intact should be a priority to

protect both deer herd populations and increase hunting opportunities.

Response

None of the action alternatives (alts 2-5) have proposed routes within Inventoried Roadless Areas (IRA's), therefore displacement and stress on large ungulates, deer herd populations and hunting opportunities should not be affected.

Letter 236

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

A tremendous increase in popularity of OHV recreation since the 1980's is well documented in a number of studies such as the National Survey on Recreation and the Environment (NSRE) by Cordell et al. This trend of increasing popularity of OHV recreation has led to the Forest Service's Travel Management Rule (TMR). The 2008 NSRE study reveals that new vehicle sales have now declined below 2003 levels. With the recent economic downturn OHV sales will decline still further. This indicates a need to revisit the concept of the rapid growth in OHV use on National Forests. It was the growth trend that led to TMR and the perceived urgency of limiting OHV use on public lands. The TMR only specifies that OHV use, be managed not eliminated.

Comment 2

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We [Merced Dirt Riders Inc.] are supportive of route designation because it will help preserve OHV multiple use of our public lands. We believe a well designed and managed system is the only way of having a sustainable OHV program. It is necessary to provide enough quantity and quality riding experiences (loops and destinations), on the Plumas National Forest (PNF).

Comment 3

Action: NEPA Process General

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

With respect to the Motorized Travel Management Project, we share your concern about protecting natural

resources and water quality and ensuring motorized travel is appropriately managed. However, after reviewing the draft Environmental Impact Statement (DEIS), we [Merced Dirt Riders Inc.] are concerned that that the proposed project is premature in its presentation and lacks the content that is necessary, to both adequately inform the public and include the public as to the best alternative. Inventory maps and other information were not provided online to the public so we could not determine what routes where eliminated and for what reasons. We can only assume that those routes were not fully analyzed because there is no data available. The Plumas National Forest was legally open to cross-country travel, these areas and trails are legal cross-country areas and any trails that are in them are legal routes. I will support the concept of designated routes, only because most people will stick to the routes that are designated.

"But they will only do that if there are enough miles of routes! Eliminating approximately 750 miles of legal routes is not the right or correct way of doing this Travel Management Plan (TMP)!"

Each existing legal route has to go through the NEPA Process on individual bases before it can be closed. With out doing that, a successful and appropriate travel management program will not be achieved.

Response

Inventoried routes were dropped if they were not specifically identified by the public as being used. The Forest used an interdisciplinary process to review the existing NFTS and the inventory of 1,107 miles of unauthorized routes to identify proposals for limited changes to the NFTS. This process included review of the Forest Plan, internal and external discussions, including extensive public collaboration workshops and input, and internal and external validation of the locations of unauthorized routes using the inventory maps. The travel management regulations provide for the incorporation of previous decisions regarding travel management. Roads, trails and areas that are currently part of the Plumas National Forest transportation system and open to motor vehicle travel will remain designated for such use. This proposal makes needed changes (additional motorized trails and areas, seasonal restrictions, etc.) to the Plumas National Forest NFTS trails and areas on NFS lands in accordance with the Travel Management Rule (36 CFR Part 212, Subpart B).

Comment 4

Action: Goals and Objectives/LRMP Consistency

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Citation: Chapter 1 and 4

While labeled a "project," the DEIS actually presents a comprehensive plan for travel management which effectively amends the Land and Resource Management Plan for the Plumas National Forest. As such an amendment, the National Forest Management Act requires that the plan provide for multiple use and be coordinated with the land and resource management planning of local governments. (16 U.S.C. 1604).

Response

This planning effort has been coordinated with various local, state and federal agencies as well as tribes (Public Involvement Chapter 1 and Distribution List Chapter 4).

Comment 5

Action: County or Municipal Laws, Policies, etc.

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS does not adequately address land use designations under the Plumas's County General Plan. There should be a comprehensive review of existing forest roads, whether officially recognized or not, taking into consideration zoning of private property. The potential for future use and likely future access needs. Many private land parcels use Forest Service Roads for ingress and egress. In particular, the standards for Limited Opportunity Areas state, that all developments shall at a minimum have legal access by means of Forest Service roads or private road easements. In addition, fire-safe requirements dictate that development in Limited Opportunity Areas shall have a minimum of two access routes for roadways over one mile. An analysis needs to be performed to determine if any private properties will be affected by the project closures.

Response

Landowners will still be able to access their properties, however they need special use permits. Landowners that

find themselves in this situation should come into their District office and begin this process as soon as practical.

Comment 6

Action: County or Municipal Laws, Policies, etc.

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas County has formally adopted the Herger-Feinstein Quincy Library Group (HFQLG) Forest Recovery Act as a resource management plan. While the draft EIS acknowledges the pending HFQLG projects for purposes of considering cumulative effects, there is no analysis as to how the closure or elimination of existing roads may impact the feasibility of planned projects. Specifically, the EIS should compare the Forest-wide, landscape scale DFPZ network of the Forest Health Pilot and HFQLG Pilot Project against a map of the Forest's proposed road closures and decommissioning. This comparison should be the basis for an EIS analysis and disclosure of any and all road closures potentially affecting access for forest treatments and for wildland fire suppression actions. Also, the travel management plan should address future fire suppression and forest management needs beyond the current scope of the HFQLG Pilot Project.

Response

As the Forest begings to address Subpart A Administration of the Forest Transportation System of the Travel Management Rule each largescale project will conduct a Travel Managment Assessnent looking at the existing road system in its entirety, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 7

Action: County or Municipal Laws, Policies, etc.

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The County of Plumas has a Fire Plan that calls for identification or development of evacuation routes from communities at risk, particularly those communities that have only one primary access route. The travel management plan does not adequately consider the need for evacuation routes or whether existing roads that are proposed for decommissioning could provide evacuation routes themselves or serve as parts of new routes.

Response

Please identify for the Forest any route that is needed for communities at risk so that we can work to improve evacuation access. We have worked with Plumas County to improve County Road 508 as an evacuation route for the Greenhorn Subdivision with the Empire Project.

Comment 8

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

While specific mileage of all existing roads has not been provided, the travel management plan appears to propose that well over 1,000 miles of roads and trails be "administratively abandoned." In consideration of this proposal, the following is pertinent:

A. No map has been made available that depicts only the locations of the roadways and trails proposed for administrative abandonment. Without such a map, the public is unable to review the proposal in a meaningful way and be made aware of the scope of its impacts.
B. The number of miles of roadway and trails that will be administratively abandoned is not even stated in the "Proposed Action" or the "Significant Issues" sections of the "Summary of the Draft Environmental Impact Statement" at Pages iii-v of the DEIS document.
C. The fact that such roadways and trails have been constructed in the past is evidence that they have been needed for various purposes. There is no correlating analysis stating the known, suggested, or unknown purposes for which the roadways and trails to be abandoned were originally constructed, or whether or not those purposes

are deemed to be no longer relevant, even though there is still existing use, or how this conclusion was drawn.
D. The DEIS does not address the fact that existing trails and roadways that may serve as access to future timber sale areas, or other areas involving the use of natural resources, or recreational trails, should be preserved. By discontinuing trails and roadways under the proposed plan, future use will require repair or reconstruction with new cost and the potential for additional environmental impacts.
E. Existing trails and roadways may be needed to serve as access during future fire fighting efforts. The DEIS fails to adequately address this very important safety issue.
F. The existence of a "short" stub trail or roadway is not, in itself, sufficient reason for administrative discontinuance of the roadway or trail regardless of how the roadway or trail was created.
G. Instead of permanently closing roads and trails that need a limited scope of improvements. Such roads and trails could be designated on a special list with the understanding that work would be undertaken as OHV and or RTP funds and volunteer help are available and thereafter the entire road or trail could be added to the inventory.
H. Any roadway or trail that is administratively discontinued as a result of the travel management plan is subject to being scheduled for physical obliteration without a subsequent road-specific trail-specific public hearing.
I. Any existing roadway or trail that is not presently experiencing extensive erosion should remain open for public use.

Response

A. All inventoried routes are shown on the Alternative 1 map.
B. Routes will be available for addition to the Forest Service trail system in the future as no decommissioning will occur with this project.
C. The majority of inventoried routes were constructed in timber sales as temporary roads or skid trails. They were not intended to be used in the future, used only for a short time frame. Many routes have also been created my users by repeated use on routes outside of timber sales.
D. Timber Sales may use these routes in the future as needed. It was determined at the time of the timber sale that these temporary roads and skid trails should not become permanent system roads and should be but to bed.
E. Fire access is not affected by designating motorized trails. Fire fighters utilize dozers to improve old trail beds to gain access to fires.
F. The public was asked to provide input on which short trails are important recreation trails.
G. Those are the "High" mitigation trails in Alternative 5 that will not be placed on the Motor Vehicle Use Map until necessary mitigation has been completed.
H. Any decommissioning will require additional NEPA and public involvement.
I. Other resource concerns as noted in Appendix A need mitigation or require additional NEPA.

Comment 9

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS has not addressed how the Plumas National Forest will respond to increased demands for OHV use in the future.

Comment 10

Action: Private Property

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Access Over Private Lands:

The lack of a formal or legal road agreement across private landowner ships should not eliminate those routes from being designated up to the public land boundary. There may a legal prescient on that route through that private parcel. The public can still travel on them through NFS land and the landowner may have given users implicit permission to pass if the property is not gated or signed at the private land boundary. Please summarize your discussions with private landowners for proposed routes that cross their property in the FEIS. If forest routes to private land have existed for decades, now is not the time to close them simply because of the private land issue. That route will still have value for firewood collecting, hunting or other recreation activities. Private landowners must post their property if they wish to restrict public access.

Response

The final rule requires responsible officials to recognize rights of access in designating roads, trails, and areas (§ 212.55(d)). Rights of access include valid existing rights and rights of use of NFS roads and NFS trails under §

212.6(b). This final rule does not affect reciprocal rights-of-way between the Forest Service and private landowners. Some property owners also may possess reserved or outstanding rightsof- way or other rights providing access across NFS lands, which may or may not require a written authorization from the Forest Service. Those rights must be recognized under § 212.55(d). Although many private private landowners allow recreational use of their lands, it is at the iscretion of the landowner what public access, if any, occurs on their lands. The Forest Service does not have the authority to dictate the use of private lands by private landholders within or adjavcent to the forest boundary, and does not have the authority to display any lands without ROWs on the MVUM or to direct the public to cross private lands where a ROW does not exist.

Comment 11

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

Mixed Use:
A key objective of travel management planning is:
To coordinate travel planning and analysis on NFS lands with other federal, state, county and other local governmental entities and tribal governments and to allow the public to participate in the designation of NFS roads, NFS trails, and areas on NFS lands for motor vehicle use. When motorized mixed use is designated on a road in California, State OHV Trust Funds may be used to maintain the road. They will help reduce the PNF's backlog of road maintenance if the PNF chooses to apply for those grants. This is another reason for lowering your maintenance levels and allowing mixed use.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3,4 and 5 Roads.

In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

The Regional Forester has the discretion to prioritize public safety over possible future funding sources.

Nothing in this decision limits or prohibits coordination with government and other entities in future decision making with regard to system roads.

Comment 12

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Big game retrieval, is not addressed in the DEIS. I recommend the PNF, to allow seasonally cross-country travel with all-terrain vehicles for the specific purpose of big game retrieval only, (barring any wet weather, fire-related or other off-road closures already in place). See FSM 7715.74 and FSM 7716.13 for designations for big game retrieval. This is a reasonable accommodation for hunters. Vehicle operators causing damage to national forest resources can be cited on an individual basis.

Response

The Plumas National Forest is considered to be a heavily roaded forest, providing ample opportunity to retrieve game without traveling cross-country. Therefore, designating areas for cross-country travel for big game retrieval was not identified as part of the purpose and need for this project and is outside the scope of this project.

Comment 13

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Wheeled over snow use is also not addressed in the DEIS.

The DEIS states:

SUMMARY: The Plumas National Forest (PNF) the following proposed actions: (1) the prohibition of motor vehicle travel off designated (NFTS) roads, motorized trails and areas by the public except as allowed by permit or other authorization (excluding snowmobiles). There are vehicles and uses that are exempt from the Travel Management Process, such as over snow vehicles, emergency purposes and vehicles, law enforcement responses, and other use that is specifically authorized. Refer to 36 CFR 212.51.

There is no definition of over snow vehicles in the DEIS. I have ridden my motorcycle and ATV over snow. I have driven my SUV and pickup over snow. My brother in law has a UTV (side by side) with tracks he uses to hunt over snow. This issue must to be addressed in the FEIS.

Response

The focus of the current action is to implement Subpart B of the travel management regulaions and to designate a system of roads, trails, and areas for motor vehicle use. Use by Over-Snow Vehicles is governed by Subpart C of the travel management regulations and is not part of the current proposal.

Comment 14

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Open areas: The TMR allows for open areas of use. For such things as 4x4 rock crawling, trials riding and family use areas. Old rock quarries, mine tailings etc., close to local communities would work well. These areas would help keep people from going off a designated route by allowing some unlimited use to smaller restricted areas. This issue must to be addressed in the FEIS.

Response

The Sly Creek area will allow for this kind of use.

Comment 15

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS fails to assure the public that the trail, roadway system mapping associated with any subsequent decision will be comprehensive as well as user friendly.

Response

Interested parties may participate in the NEPA process by checking the quarterly SOPA and letting the contact person for the project know that they are interested in being informed about the project at the beginning of each quarter. The SOPA is posted on the Forest website under "Plans and Projects" (http://www.fs.fed.us/r5/plumas /projects_and_plans/). The SOPA quarters are Oct. 1, Jan. 1, April 1, July 1.

Letter 237

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

A tremendous increase in popularity of OHV recreation since the 1980's is well documented in a number of studies such as the National Survey on Recreation and the Environment (NSRE) by Cordell et al. This trend of increasing popularity of OHV recreation has led to the Forest Service's Travel Management Rule (TMR). The 2008 NSRE study reveals that new vehicle sales have now declined below 2003 levels. With the recent economic downturn OHV sales will decline still further. This indicates a need to revisit the concept of the rapid growth in OHV use on National Forests. It was the growth trend that led to TMR and the perceived urgency of limiting OHV use on public lands. The TMR only specifies that OHV use, be managed not eliminated.

Comment 2

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am supportive of route designation because it will help preserve OHV multiple use of our public lands. We believe a well designed and managed system is the only way of having a sustainable OHV program. It is necessary to provide enough quantity and quality riding experiences (loops and destinations), on the Plumas National Forest (PNF).

Comment 3

Action: NEPA Process General

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

With respect to the Motorized Travel Management Project, we share your concern about protecting natural resources and water quality and ensuring motorized travel is appropriately managed. However, after reviewing the draft Environmental Impact Statement (DEIS). We are concerned that the proposed project is premature in its presentation and lacks the content that is necessary, to both adequately inform the public and include the public as to the best alternative. Inventory maps and other information were not provided online to the public so we could not determine what routes where eliminated and for what reasons. We can only assume that those routes were not fully analyzed because there is no data available. The Plumas National Forest was legally open to cross-country travel, these areas and trails are legal cross-country areas and any trails that are in them are legal routes. I will support the concept of designated routes, only because most people will stick to the routes that are designated.

"But they will only do that if there are enough miles of routes! Eliminating approximately 750 miles of legal routes is not the right or correct way of doing this Travel Management Plan (TMP)!"

Each existing legal route has to go through the NEPA Process on individual bases before it can be closed. With out doing that, a successful and appropriate travel management program will not be achieved.

Response

Routes that are not designated with this project may be added at a later date as no routes will be decommissioning with this project.

Comment 4

Action: Goals and Objectives/LRMP Consistency

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

While labeled a "project," the DEIS actually presents a comprehensive plan for travel management which effectively amends the Land and Resource Management Plan for the Plumas National Forest. As such an amendment, the National Forest Management Act requires that the plan provide for multiple use and be coordinated with the land and resource management planning of local governments. (16 U.S.C. 1604).

Response

This FEIS will add motorized trail and areas. This does not require a amendment to the Plumas National forest Land and Resource Management Plan.

Comment 5

Action: County or Municipal Laws, Policies, etc.

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS does not adequately address land use designations under the Plumas's County General Plan. There should be a comprehensive review of existing forest roads, whether officially recognized or not, taking into consideration zoning of private property. The potential for future use and likely future access needs. Many private land parcels use Forest Service Roads for ingress and egress. In particular, the standards for Limited Opportunity Areas state, that all developments shall at a minimum have legal access by means of Forest Service roads or private road easements. In addition, fire-safe requirements dictate that development in Limited Opportunity Areas shall have a minimum of two access routes for roadways over one mile. An analysis needs to be performed to determine if any private properties will be affected by the project closures.

Response

The Plumas National Forest will respond to revised zoning maps once they are received from the county. Our Public Service Staffs can help with the process necessary to address access needs.

Comment 6

Action: County or Municipal Laws, Policies, etc.

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas County has formally adopted the Herger-Feinstein Quincy Library Group (HFQLG) Forest Recovery Act as a resource management plan. While the draft EIS acknowledges the pending HFQLG projects for purposes of considering cumulative effects, there is no analysis as to how the closure or elimination of existing roads may impact the feasibility of planned projects. Specifically, the EIS should compare the Forest-wide, landscape scale DFPZ network of the Forest Health Pilot and HFQLG Pilot Project against a map of the Forest's proposed road closures and decommissioning. This comparison should be the basis for an EIS analysis and disclosure of any and all road closures potentially affecting access for forest treatments and for wildland fire suppression actions. Also, the travel management plan should address future fire suppression and forest management needs beyond the current scope of the HFQLG Pilot Project.

Response

The Plumas National Forest manages 4200 mile of system roads that provide access to HFQLG projects. This EIS is not proposing any system road closures or decommissioning. The routes that have not been selected for OHV trails can be used for timber sale and fire access.

Comment 7

Action: County or Municipal Laws, Policies, etc.

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

The County of Plumas has a Fire Plan that calls for identification or development of evacuation routes from communities at risk, particularly those communities that have only one primary access route. The travel management plan does not adequately consider the need for evacuation routes or whether existing roads that are proposed for decommissioning could provide evacuation routes themselves or serve as parts of new routes.

Response

Please identify any route that is needed for communities at risk so that we can work to improve evacuation access. We have worked with Plumas County to improve County Road 508 as an evacuation route for the Greenhorn Subdivision with the Empire Project.

Comment 8

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

While specific mileage of all existing roads has not been provided, the travel management plan appears to propose that well over 1,000 miles of roads and trails be "administratively abandoned." In consideration of this proposal, the following is pertinent:

A. No map has been made available that depicts only the locations of the roadways and trails proposed for administrative abandonment. Without such a map, the public is unable to review the proposal in a meaningful way and be made aware of the scope of its impacts.
B. The number of miles of roadway and trails that will be administratively abandoned is not even stated in the "Proposed Action" or the "Significant Issues" sections of the "Summary of the Draft Environmental Impact Statement" at Pages iii-v of the DEIS document.
C. The fact that such roadways and trails have been constructed in the past is evidence that they have been needed for various purposes. There is no correlating analysis stating the known, suggested, or unknown purposes for which the roadways and trails to be abandoned were originally constructed, or whether or not those purposes are deemed to be no longer relevant, even though there is still existing use, or how this conclusion was drawn.
D. The DEIS does not address the fact that existing trails and roadways that may serve as access to future timber sale areas, or other areas involving the use of natural resources, or recreational trails, should be preserved. By discontinuing trails and roadways under the proposed plan, future use will require repair or reconstruction with new cost and the potential for additional environmental impacts.
E. Existing trails and roadways may be needed to serve as access during future fire fighting efforts. The DEIS fails to adequately address this very important safety issue.
F. The existence of a "short" stub trail or roadway is not, in itself, sufficient reason for administrative discontinuance of the roadway or trail regardless of how the roadway or trail was created.
G. Instead of permanently closing roads and trails that need a limited scope of improvements. Such roads and trails could be designated on a special list with the understanding that work would be undertaken as OHV and or RTP funds and volunteer help are available and thereafter the entire road or trail could be added to the inventory.
H. Any roadway or trail that is administratively discontinued as a result of the travel management plan is subject to being scheduled for physical obliteration without a subsequent road-specific trail-specific public hearing.
I. Any existing roadway or trail that is not presently experiencing extensive erosion should remain open for public use.

Response

A. Alternative 1 map shows all the routes inventoried. Compare against each alternative one can determine which ones are not proposed for addition to our trail system.
B. Thanks for your comment. We will include this in the FEIS. Administratively abandoned miles are 745 miles in Alternative 2, 1090 miles in Alternative 3, 968 miles in Alternative 4 and 839 miles in Alternative 5.
C. Many of these routes were temporary roads and skid trails that were not adequately decommissioned after use.
D. Many of these routes were temporary roads and skid trails that would be available for timber sale use in the future.
E. Fire fighters can use any route that is available. Once they are decommissioned our overgrown they would need

to use their dozer to gain access to these areas.
F. The trails we are designating are intended for recreation use and therefore should provide some sort of recreational experience.
G. With Alternative 5, we are designating trails that will require mitigation prior to being placed on the Motor Vehicle Use Map. The routes that were surveyed that had an extreme rating require a reroute that was not surveyed and is therefore outside the scope of this EIS.
H. Any route that is not designated will require additional NEPA prior to decommissioning. In all cases the public will have another chance to propose additional routes to be designated as OHV trails.
I. Other resource concerns also kept trails from being proposed for designation.

Comment 9

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS has not addressed how the Plumas National Forest will respond to increased demands for OHV use in the future.

Response

All proposed trails had to be surveyed by resource specialist to access their suitability to be included in our designated motorized trail system. Additional routes can be added in the future with additional analysis.

Comment 10

Action: Private Property

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Access Over Private Lands:

The lack of a formal or legal road agreement across private landowner ships should not eliminate those routes from being designated up to the public land boundary. There may a legal prescient on that route through that private parcel. The public can still travel on them through NFS land and the landowner may have given users implicit permission to pass if the property is not gated or signed at the private land boundary. Please summarize your discussions with private landowners for proposed routes that cross their property in the FEIS. If forest routes to private land have existed for decades, now is not the time to close them simply because of the private land issue. That route will still have value for firewood collecting, hunting or other recreation activities. Private landowners must post their property if they wish to restrict public access.

Response

The final rule requires responsible officials to recognize rights of access in designating roads, trails, and areas (§ 212.55(d)). Rights of access include valid existing rights and rights of use of NFS roads and NFS trails under § 212.6(b). This final rule does not affect reciprocal rights-of-way between the Forest Service and private landowners. Some property owners also may possess reserved or outstanding rights of- way or other rights providing access across NFS lands, which may or may not require a written authorization from the Forest Service. Those rights must be recognized under § 212.55(d).

Comment 11

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Mixed Use:
A key objective of travel management planning is: To coordinate travel planning and analysis on NFS lands with other federal, state, county and other local governmental entities and tribal governments and to allow the public to participate in the designation of NFS roads, NFS trails, and areas on NFS lands for motor vehicle use. When motorized mixed use is designated on a road in California, State OHV Trust Funds may be used to maintain the road. They will help reduce the PNF's backlog of road maintenance if the PNF chooses to apply for those grants. This is another reason for lowering your maintenance levels and allowing mixed use.

Comment 12

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Big game retrieval, is not addressed in the DEIS. I recommend the PNF, to allow seasonally cross-country travel with all-terrain vehicles for the specific purpose of big game retrieval only, (barring any wet weather, fire-related or other off-road closures already in place). See FSM 7715.74 and FSM 7716.13 for designations for big game retrieval. This is a reasonable accommodation for hunters. Vehicle operators causing damage to national forest resources can be cited on an individual basis.

Response

Retrieval of big game animals off of existing designated roads would be considered cross country travel, which is prohibited under the Travel Management Rule (36 CFR212). For persons with disabilities, big game retrieval may be allowed by permit at the discretion of the District Ranger.

Comment 13

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Wheeled over snow use is also not addressed in the DEIS.

The DEIS states:
SUMMARY: The Plumas National Forest (PNF) the following proposed actions: (1) the prohibition of motor vehicle travel off designated (NFTS) roads, motorized trails and areas by the public except as allowed by permit or other authorization (excluding snowmobiles). There are vehicles and uses that are exempt from the Travel Management Process, such as over snow vehicles, emergency purposes and vehicles, law enforcement responses, and other use that is specifically authorized. Refer to 36 CFR 212.51.

There is no definition of over snow vehicles in the DEIS. I have ridden my motorcycle and ATV over snow. I have driven my SUV and pickup over snow. My brother in law has a UTV (side by side) with tracks he uses to hunt over snow. This issue must to be addressed in the FEIS.

Response

The agency has the discretion to determine the actions it undertakes and the timing of those actions. The purpose of the current action is to implement subpart B of the TMR. The consideration of OSV use is not a part of subpart B.

Comment 14

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Open areas: The TMR allows for open areas of use. For such things as 4x4 rock crawling, trials riding and family use areas. Old rock quarries, mine tailings etc., close to local communities would work well. These areas would help keep people from going off a designated route by allowing some unlimited use to smaller restricted areas. This issue must to be addressed in the FEIS.

Response

The Sly Creek open areas has been proposed for that need.

Comment 15

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS fails to assure the public that the trail, roadway system mapping associated with any subsequent decision will be comprehensive as well as user friendly.

Response

There are national mapping standards for the development of a Motorized Vehicle Use Map (MVUM) which will be the official map identifying routes open to motorized use. These maps will be similar for all units, allowing for seamless motorized route coverage across adjacent forests or other administrative units. The MVUM map, however, will only show motorized routes. Additional maps showing non-motorized routes will be available, most likely displayed on the Forest Visitor map as they are currently, and perhaps by geographic area maps. With the publishing of quality OHV recreation maps, it is expected that people unfamiliar with the Plumas National Forest will start riding trails that are currently not on any maps.

Letter 238

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

BRC [Blue Ribbon Coalition] is concerned that of the 1,100 miles of unauthorized routes inventoried by the Forest that only 251 miles of said routes (Table 3) were identified for addition to the National Forest System.

Comment 2

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

BRC [Blue Ribbon Coalition] appreciates the designation (and reclassification of high standard roads) of an additional 11 miles for mixed use. BRC believes mixed use designations are a key component for successful implementation of the program. Mixed used routes often connect up various trails and staging areas or act as an OHV transportation corridor. BRC asks the Forest to review additional site-specific comments by the public regarding other important level 3 road segments for designation in a modified Alternative 5.

Response

We are following Regional Direction for designation of Mixed Use Roads. Future analysis may identify addition roads for Mixed Use Designation.

Comment 3

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

BRC [Blue Ribbon Coalition] is concerned that none of the "extreme rated" trails were conditionally designated. BRC understands and appreciates the various resource issues associated with an "extreme" rating. However, BRC would not support any decision that arbitrarily places all extreme routes in a sort of trail purgatory where they could never be considered for designation in a future planning process once resources become available for trail reconstruction, rerouting, or some other mitigation.

Response

Most routes with an extreme rating will require new trail construction that is not part of this effort. With future projects, those reroutes and new construction could be proposed and the route brought in the Plumas National Forest trail system.

Comment 4

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

BRC [Blue Ribbon Coalition] supports the agency's designation of the 36-acre Sly Creek play area for all-year use by OHVs less than 50-inches in width.

Comment 5

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

BRC [Blue Ribbon Coalition] supports Alternative 5's effort to provide the greatest amount of access to dispersed use areas of the alternatives that add trails to the National Forest System.

Comment 6

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

For low to mid-elevation trails that provide important winter OHV recreational opportunity, BRC [Blue Ribbon Coalition] recommends the agency designate those routes as open for use all-year and use rainfall based management prescriptions for those trail networks.

Those prescriptions are listed below:

Rainfall Based Closures - Again, BRC [Blue Ribbon Coalition] supports the development and implementation of appropriate wet weather seasonal closures - based on specific rainfall amounts collected by NOAA approved rain gauges – to motorized and non-motorized use to reduce damage to native surfaced trail and road beds.

BRC [Blue Ribbon Coalition] encourages the Forest to review the rainfall-based closure criteria used at other destination OHV areas including Upper Lake, Cow Mountain, and Stonyford. BRC believes that area-specific rainfall-based closures are preferable where appropriate to time-based seasonal landscape level or forest-wide closures. They are appropriate prescriptions for lower elevation routes more closely associated with dispersed OHV recreational uses.

Users can access NOAA rainfall measurements at: http://www.wrh.noaa.gov/mesowest/mwmap.php?map=sto The use of the internet by users to access rainfall information has been the key to the success of said prescriptions at Upper Lake and Stonyford. BRC [Blue Ribbon Coalition] believes that use of the internet by the FS could play a significant role in the success of the program.

Rainfall based closure at Upper Lake http://www.fs.fed.uslr5lmendocino/currentconditions/

March 2, 2009 - The Mendocino National Forest has received over 2 inches of rain and the Upper Lake OHV trail systems are closed. The period of closure will remain in effect until there 48 hours of NO measurable precipitation. The Stonyford Trail systems are currently re-opened pending changing weather conditions.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist. Precipitation data does not adequately describe saturation and soil moisture conditions so a closure based on rain gauge data alone would not accurately predict when travel on the trails would not produce soil and water impacts.

Comment 7

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Short Seasonal Closures - If public egress and ingress to low or mid-elevation OHV routes is too difficult to manage, consider using a short 3 month seasonal closure similar to what the Eldorado National Forest is using: http://www.fs.fed.us/r5/eldorado

Annual Seasonal Closure of Eldorado National Forest Dirt Roads and Trails Begins January 1

It's time for winter visitors to the Eldorado National Forest to begin thinking about the annual closing of dirt roads and trails that begins on January I and extends through March 31.

"This is the first year the annual seasonal closure of dirt roads and trails will go into effect, " said Eldorado National Forest Supervisor Ramiro Villalvazo. "This may be news to some people, however, it shouldn't come as a surprise to the thousands of people who participated in the travel management decision making process that occurred over the past three years. "This decision only affects dirt roads and trails. More than 600 miles of paved and graveled roads and trails will continue to be open during this time period.

In NEPA, it is always easier to extend a short seasonal closure than to contract a longer seasonal closure.

Response

The season of use restriction mitigation for the Flea Mountain area has been changed to January 1 to March 31 for all action alternatives. The season of use restriction mitigation for the French Creek area has been changed to January 1 to April 30. Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist.

Comment 8

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

BRC [Blue Ribbon Coalition] believes the agency should continue to fully embrace the concept of converting "roads-to-single track trails" or "roads-to-motorized trails less than 50 inches in width" and "roads managed as motorized trails greater than 50 inches in width" as a tool to help it achieve its budget objectives while still providing a substantive recreational route network.

Comment 9

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Based on our review of the DEIS, BRC [Blue Ribbon Coalition] believes a modified Alternative 5 with the following revisions should be created and included in the FEIS.

"Open All Year" Routes - Designate appropriate low to mid-elevation OHV trails as "Open All Year" and use the rainfall-based closure criteria similar to the Rock Creek/Georgetown OHV Area or at the Upper Lake/Stonyford OHV Area or the BLM's Cow Mountain Recreation Area -with a direct reference to a specified NOAA gauge which automatically reports internet accessible real-time rain measurements.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist. Precipitation data does not adequately describe saturation and soil moisture conditions so a closure based on rain gauge data alone would not accurately predict when travel on the trails would not produce soil and water impacts.

Comment 10

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Based on our review of the DEIS, BRC [Blue Ribbon Coalition] believes a modified Alternative 5 with the following revisions should be created and included in the FEIS.

Designate Additional Open Areas - Based on new public comments advocating for additional open areas, BRC urges the agency to designate those sites as Open Areas with use limited to existing routes or where cross-country travel is allowed.

Comment 11

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Based on our review of the DEIS, BRC [Blue Ribbon Coalition] believes a modified Alternative 5 with the following revisions should be created and included in the FEIS.

Designate Additional Expert Level Single Track or Slow Speed 4WD Opportunities – BRC [Blue Ribbon Coalition] requests the agency to again review sites specific comments submitted by local interests regarding the inclusion of historic expert level user motorcycle or 4WD routes. BRC believes the agency may not appreciate said routes in a regional context where the Forest currently affords the public a unique high-quality and expert level trail experience not found elsewhere in Region 5.

Response

Most of these routes are considered hill climbs and are contributing sediment to drainages, are entrenched and

growing wider and deeper. These routes could be added in the future with additional relocation and trail construction.

Comment 12

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Based on our review of the DEIS, BRC [Blue Ribbon Coalition] believes a modified Alternative 5 with the following revisions should be created and included in the FEIS.

Designation of more user/unauthorized routes – BRC [Blue Ribbon Coalition] urges the agency to designate at least 30-50 miles of additional single-track motorcycle trails in a Modified Alternative 5. Based on site-specific comments by local users, consider designating the 91 miles (Table 8) of motorcycle trails in Alt. 2 vs. the 65 miles of motorcycle trails in Alt. 5. BRC believes that modification to Alternative 5 would more correctly reflect important historic public use on those affected routes.

Again at the public DEIS meetings, the agency related to the attendees that the Forest has approximately 1,100 miles of historic user routes. A modified Alternative 5 that designates the 364 miles of user routes (Table 3) as identified in Alt. 2 (proposed action) instead of the 251 miles in Alt. 5 would be better accepted by the OHV community as an effort by the Forest to meet users halfway.

Response

Most of these routes are considered hill climbs and are contributing sediment to drainages, are entrenched and growing wider and deeper. These routes could be added in the future with additional relocation and trail construction. Other routes have impacts to other resource areas requiring relocation and new trail construction which is outside the scope of this project.

Comment 13

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Based on our review of the DEIS, BRC [Blue Ribbon Coalition] believes a modified Alternative 5 with the following revisions should be created and included in the FEIS.

Additional Mixed Use Designations - Local clubs and users may bring forth additional roads that should be designated as mixed use. BRC urges the agency to review those roads segments of 3 miles in length or shorter.

Comment 14

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Based on our review of the DEIS, BRC [Blue Ribbon Coalition] believes a modified Alternative 5 with the following revisions should be created and included in the FEIS.

Additional Issues – BRC [Blue Ribbon Coalition] believes the public will bring forth additional comments during the DEIS process regarding dispersed camping, winter use for 4WD vehicles, access for hunters, and other topics that are equally important and should be considered in a modified Alternative 5.

Letter 239

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Volunteer Groups and Partnerships

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

In the background section of the DEIS, it is stated that "Over the past few decades, the availability and capability of motorized vehicles, particularly off-highway vehicles (OHVs) and sport utility vehicles (SUVs) has increased tremendously. Nationally, the number of OHV users has climbed sevenfold in the past 30 years, from approximately 5 million in 1972 to 36 million in 2000. California is experiencing the highest level of OHV use of any state in the Nation. There were 786,914 ATVs and OHV motorcycles registered in California in 2004, up 330 percent since 1980.

Annual sales of ATVs and OHV motorcycles in California were the highest in the U.S. for the last 5 years. Four-wheel drive vehicle sales in California also increased 1,500 percent to 3,046,866 from 1989 to 2002.

Unmanaged OHV use on national forest lands has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Compaction and erosion are the primary effects of OHV use on soils. Riparian areas and aquatic dependent species are particularly vulnerable to adverse impacts from OHV use. Unmanaged recreation, including impacts from OHV's, is one of "Four Key Threats Facing the Nation's Forests and Grasslands." (USDA Forest Service, June 2004)."

We [California Association of 4 Wheel Drive Clubs, Inc] fully agree that there has been and will continue to be increasing use of our public lands. We also understand that there are and will be impacts to these lands. Whether it is motorized or non-motorized, impacts will happen but the degree of these impacts is the issue. Closing or severely limiting use of motorized trails is not the answer. Managing motorized trails is the root of the issue. We would encourage you to use the very people who use these trails and roads to help managing these trails and roads. We also understand the funds coming from the federal government have not kept pace with the increased use of our public lands. Closing or severely limiting the use is not going to help in making the funds that you do receive work more efficiently.

Comment 2

Action: Alternative 2 (Proposed Action Alternative)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Under the alternatives presented in the DEIS, we would agree that Alternative #2 would best serve the public.

Comment 3

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Dispersed Camping

We [California Association of 4 Wheel Drive Clubs, Inc] would like to thank the Plumas National Forest for looking at the issue of dispersed camping. Dispersed camping is an integral part of motorized recreation on our public lands.

In the U.S. Forest Service-Pacific Southwest Region Route Designation dated May 3, 2007 Dispersed Camping and Game Retrieval Guidance, IN FMS 7715.64 (proposed) Big Game Retrieval and Dispersed Camping,

#1 The responsible official may include in a designation the limited use of motor vehicles within a specified distance of a certain forest road and trails, and if appropriate. Within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal (big game retrieval).

#4 Responsible officials should consider proving designated route to dispersed camping site as an alternative to authorizing off-rout use under FSM 7715.64 paragraph 1.

Page 5, Paragraph 2

The Travel Management Analysis and decision making process provides the opportunity for the responsible official to designate limited motor vehicle use within a specified distance of a designated route, and if appropriate within a specified time periods for the purpose of dispersed camping.

The Plumas National Forest has encouraged dispersed camping for over 50 years. We feel it is only right that these dispersed camping sites and areas be in the Travel Management Plan. We contend that it needs to be a part of this process and some other process that may take years to complete. In the mean time, the public will not have the opportunity to enjoy dispersed recreation.

Limiting the parking of a motorized vehicle to one vehicle length from the edge of the route surface for parking and dispersed camping. This is unrealistic, not to mention a public safety issue. You are expecting a person to park their vehicle alongside a traveled road or trail and leave that vehicle to be vandalized, broken into, or worse. This is also very discriminating against people who are unable to walk and carry their camping equipment a safe distance off a traveled route. What is vehicle length? A Jeep, a long bed pickup, or an ATV? It would be far safer to designate spurs to these camp sites, fishing spots, or parking areas.

You, as the deciding official, has the flexibility as stated many times in other guidelines to change this to be more reasonable, not only for the public, but to enforcement by the Forest Service.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail. See Recreation Section 3.2.5.1 Indicator Measure 4 for specific information on reduced dispersed camping opportunities. Additional trails can be added in the future to access dispersed camp sites that were not included in this analysis. Dispersed camp sites are considered part of the road or trail facility and would allow for their continued use.

Comment 4

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Over The Snow Travel

Over the snow travel is very important to the four wheel drive community. Under the current alternatives, except the No Action Alternative, over the snow travel would be prohibited. By closing all native surface roads and trails from January to April 1st or longer, over the snow travel will not be allowed in the Tahoe National Forest. Most, if not all, non- native surface roads and trails are closed to everyone except for groomed snowmobile routes.

The four wheel drive community suggests that if you are going to have a seasonal closure, the forest designates some roads or trails open to vehicles to play and drive in the snow during the winter months.

Response

Only 45 miles of trails have a seasonal restriction in Alternative 5. No system roads are affected by seasonal restrictions on the Plumas National Forest.

Comment 5

Action: Seasonal Closures

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Seasonal Closures

Seasonal Closure has been a very hot topic since the start of this process. The Forest Service has stated many times that they have to have a seasonal closure. At several of the meetings that we have had with the Forest Service, we suggested several ideas on seasonal closures. Some of these ideas included to have seasonal closures only in areas that warrant them. If the issue is lower elevations in a particular area, then that is where they should be implemented.

Any seasonal closure should be of the shortest time period possible. The Forest Service has the ability to close these trails and roads if needed using many tools at their disposal.

Response

Only 45 miles of trails have a seasonal restriction in Alternative 5. These trails are in the front country on the West side of the forest due to wet soil conditions and on a handful of trails impacting wildlife. No system roads are affected by seasonal restrictions on the Plumas National Forest.

Comment 6

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Implementation

The DEIS does not address how the Forest Service is going to implement this proposed action. This is a major flaw in the DEIS. Without a plan on how to implement the decision, it is like making a cake and not having a place to bake it. Implementation must be addressed in any plan, yet it is not part of this DEIS.

Response

Trails with low or moderate mitigations will be placed on the MVUM. Coordination with user groups will occur on trails with high mitigations to determined where we want to work to obtain grants and organize volunteer work parties to complete work necessary to allow these trails to be added to the MVUM.

Comment 7

Action: Enforcement/Funding/Staffing

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Law Enforcement

The DEIS does not address the need for much more law enforcement once the process is finished. Some of the public will have a difficult time with route designation and the need for more enforcement should be anticipated and included. Where will the funding come from for this enforcement? It was stated at the public meetings that the forest is planning on applying for OHV funds from the State of California for enforcement dollars. This is not a given. It is unclear at this time how much money, if any money, will be available from the OHV Fund. The Forest cannot rely on OHV Funds to fund this important aspect of the plan.

Response

The implementation of a travel plan is accomplished by a great number of administrative actions. The Forest will be using this full range of actions. They may include, but are not limited to:
• Requesting additional funding in future years.
• Training additional staff to help with law enforcement as a co-lateral duty.
• Changing the work schedules of field going staff to increase the number of Forest Service employees present in the field on the weekends.
• Education and outreach programs to people visiting the Forest.
• Partnering with individuals and groups to increase visitor contacts in the field.
• Partnering with individuals and groups to produce and distribute information and user friendly maps that make obeying the travel plan easier.
• Trail signing.

Comment 8

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Mapping

This is another item in the DEIS that is incomplete. It was stated at the public meetings that the forest plans to produce a Travel Management map each year. This is not realistic. Here again, where is the money going to come from to produce a map each year? You are talking a great amount of expense to produce a map each and every year.

Another item that we are concerned about is these maps will show open routes for the public to use; thus, these are the only legal routes to use. A huge problem is it is very easy to have routes drop off a map and thus become closed. We have seen this happen many times with this forest as well as other forests that a route just seems to disappear off of a map.

You can't expect the public to get a new map each year not only to use on the trail but also to have to review these maps and make sure each route is still on the map. A map should be good until items on that map are changed for one reason or another.

Response

We will only produce new maps as needed. It is expected during the first years there will be a need to update the maps yearly to correct mistakes that are identified during use. We are not expecting trails to be dropped from the map unless serious resource damage is occurring that can not be corrected.

Letter 240

Attributes

Attribute	Value
Early Attention	Provides proposals for new alternatives
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Cumulatively the partners, their associates and members on the following comments represent over 50,000 recreational users in California, hundreds of clubs, and tens of thousands of volunteer hours. These people will be dramatically impacted by the changes suggested in the DEIS.

The California motorized recreation community has paid out $12,800,000.00 [million] in support funding to date for this process. The message that is being clearly heard by the public is: there is no valid place for meaningful motorized recreation within our national lands.

Comment 2

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Jim Pena, Assistant Regional Forester of Region 5, expressed that his only goal for Travel Management is to produce 'legally sustainable' documents.

In contrast, former Forest Service Chief, Dale Bosworth, expressed the desire to 'improve [[USFS]] management so we get responsible recreation based on sound ethics, in the oft quoted 'Four Threats' Speech.

We [California Off Road Vehicles Association] allege that this document does not support either of these objectives, it is neither legally sustainable nor does it effectively manage recreation.

We contend, that a Supplementary DEIS is not only warranted, it is necessary due to the omissions, lack of quality data and manufactured uncertainty. Especially since there are no effects to the forest environment, in any Alternative – including the No Action, but very negative effects to the human environment (the trail opportunity & benefits) which are not disclosed. This entire DEIS represents a substantial evasion of CEQ's regulatory intentions.

Comment 3

Action: Decisionmaking Philosophy

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Decision on Page Two

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.A.
Unsubstantiated Predecisional Opening Statements

Please refer to page 1 and 2, beginning with section 1.2 Background, paragraph 2:
Unmanaged motor vehicle use, particularly OHV use, has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Compaction and erosion are the primary effects of motor vehicle use on soils. Riparian areas and aquatic dependent species are particularly vulnerable to damage from motor vehicle use. Unmanaged recreation, including impacts from OHVs, is one of "Four Key Threats Facing the Nation's Forests and Grasslands." (USDA Forest Service, June 2004)

There are three troubles with the statement.

First, The DEIS writers represent the statement as something produced by the Forest Service, perhaps a study, or a research project. This is false. It is a statement made by a former Chief of the Forest Service, containing no supporting documentation. What a former Chief of the Forest Service said in 2004 may or may not be appropriate to the Plumas National Forest.

Second, under any legal standard, the statement is hearsay. The EIS has the burden of showing whether or not this unsupported claim is true for the Plumas National Forest.
Third, placing this statement at the very beginning of what the CEQ intends to be an objective, scientific analysis is fatally pre-decisional.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.B.
Undisclosed Internal Decisions

Continuing to paragraph 5 on page 2, the inclusion of "internal and external discussions" fails the CEQ standards for information used in a NEPA analysis. "Internal discussions," unless they are described in the analysis, supported by factual information, and subjected to public scrutiny, cannot be used to formulate any part of the decision. "Internal discussions" are not previous decisions.
Undisclosed "internal discussions" represent the essence of arbitrary and capricious. Undisclosed "internal discussions" lead to the unmistakable perception that internal discussions influenced this analysis, but the discussions must be kept secret.

Response

These discussions were pre NEPA involving development of a sustainable, affordable and safe trail system for the Plumas National Forest.

Comment 5

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.C.
Limited Changes to the NFTS – No Regard for Demand

Also on page 2 paragraph 5,

Approximately 1,109 miles of unauthorized routes were identified. The Forest then used an interdisciplinary process to review the existing NFTS and the inventory of unauthorized routes to identify proposals for limited changes to the NFTS.

When language like this is placed in the background and purpose for the action, but before the analysis has even been started, it is 'pre-decisional.' We have four reasons to say that:

First, the term "unauthorized routes" is illegal. The routes are not unauthorized; changing to that name broadcasts the Forest Service's pre-judgment of the routes.

Second, calling them unauthorized enables the Forest Service to discount the value and purpose of the routes.

Third, the Forest Service is telling us that any change will be very small ("limited"), regardless of its effect on the existing road and trail system. In fact, by the time we get to page 6 of the document, the Forest Service has told us seven times that the changes will be limited.

Fourth, the Forest Service is stating on page 2 that it intends to make only limited changes regardless of public input, regardless of the findings of this analysis, and worst of all -- regardless of the fact that there is a demonstrated need for large changes to the NFTS. Why do we say this? Because the inventory of unclassified routes identified approximately 1,109 miles of "routes," which the Forest Service claims are "mostly user-created." Perhaps. However, user-created product is a manifestation of user demand for that product. The Forest Service demonstrates no regard for this demand. The Forest Service is telling us on page 2 of the analysis that it already decided only small changes will be made. Then the Forest Service proceeds to prove us correct that the decision was made prior to this analysis because out of that 1,109 miles, only 51 miles of trail is left open for motorcycle use, 35 miles for ATV's, and 165 miles for "All".

Comment 6

Action: Purpose and Need

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.D.
Insertion of Conclusions Prior to Analysis

Now, please refer to 1.3 Purpose and Need, page four:

The following needs have been identified for this proposal:

1. There is a need for regulation of unmanaged motor vehicle travel by the public. The proliferation of unplanned, unauthorized, non-sustainable roads, trails and areas created by cross-country travel adversely impacts the environment.

Here, the PNF is stating its intended outcome in the Purpose and Need. Why do we say that? Because the analysis is where the results of the present situation is revealed, not the Purpose and Need. The Purpose and Need for this action is to comply with the new regulation, Title 36, 212, subpart B. There is no language in Subpart B that claims any sort of impacts at all--good or bad. The DEIS writers have inserted an as-yet unsupported belief directly into the Purpose and Need.

Rigged Decision
This severely limits the DEIS writers' perception of the significant issues, it severely limits the range of alternatives, and ultimately, it will rig the Decision. How does it rig the Decision? It rigs the Decision by limiting the range of choices available to the Deciding Officer, to only those choices derived from the beliefs set forth in the Purpose and Need. How did it do that? It does that by screening out any alternative that does not derive its essential assumptions from the beliefs set forth in the Purpose and Need.

Comment 7

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.E.
Misrepresentation of Travel Management Rule, Subpart B

Further evidence that the decision was made prior even to the data call is found on page 5, [1.3 Purpose and Need] #2, second bullet item:

....Implementation of Subpart B of the Travel Management Rule would severely reduce acres and miles of motorized recreation opportunities relative to current levels. (Emphasis added)

This statement is not true. Subpart B is not a mandate to severely limit the miles of trails and roads available for motor access to NFS lands. Subpart B instructs the Forests to designate roads and trails for motor vehicle use, and end all traditional cross-country travel. The DEIS writers seem to assume that reviewers of this document will not check the language in Subpart B, thus enabling the PNF's misrepresentation of the TMR. This misrepresentation may be a simple misunderstanding or it may be intentional; but it is a misrepresentation nonetheless.

Comment 8

Action: Decisionmaking Philosophy

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.F.
Limited Options Despite Public Outcry

Further evidence the decision was made prior to the scoping process is found on page 8.

1.8.1 Significant Issues

Issue 1: The proposed action unreasonably restricts motorized recreation use by prohibiting cross-country travel and restricting use to designated routes. The addition of only 364 miles of NFS motorized trails to the NFTS provides insufficient public access to PNF NFS lands and unfairly limits motorized recreation.

We can assure the deciding officer, the reviewing officer, and the court if necessary, that the responsible participating publics do not generally object to prohibiting cross-country travel. We object to the tiny percentage of

mileage proposed for designation. Yet our clearly expressed concerns had no effect on the formulation of the alternatives.

3 Alternatives
The statement on page i of the Abstract appears to be false.

…and three additional action alternatives developed to meet the purpose and need and respond to issues raised by the public

CEQ clearly states that the alternatives must provide a clear basis for choice among the options (the different ways of accomplishing the needed action). Our clearly expressed issue (only 364 miles is insufficient for access and recreation values) had no effect on the alternatives developed. Further, on page i, making up three additional alternatives have nothing to do with responding to the Purpose and Need (1502.14). The PNF either does not understand the objectives of having a range of alternatives or the PNF made up the extra alternatives because CEQ says you have to have at least three. Our point is, the three additional alternatives did not respond to issues raised by the public.

Why do we say that? Because in the Notice of Intent, the proposed mileage was 364.4; and that same amount of mileage is the maximum offered in any alternative in the DEIS; and the preferred alternative proposes considerably less mileage. Because of this disregard for the affected public's concern, it is difficult to perceive the alternatives in this DEIS as anything other than pre-determined for the purpose of limiting the options available to the Decision maker.

Response

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1). The initial proposal consisted of known routes used by the public, including destinations, loops, and spur routes to fishing access and favorite dispersed camping sites. The initial proposal avoided routes on private land with no right of way, routes where motorized use would conflict with existing uses, and routes with measurable resource impacts. Information meetings were held in Quincy, Portola, and Oroville in April. Followup workshops were held in each city during May.

Alternative 3 responds to non-motorized recreation interest in “Citizen Inventoried Roadless Areas (CIRAs)” proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 9

Action: Scope/Scale of analysis

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.G.
Citizen Inventoried Roadless Areas Rig Outcome

The effects of "adding" trails to citizen-inventoried roadless areas, also rigs the outcome, as identified in the second significant issue in section 1.8.1 Significant Issues. Why do we say that? Because:

CIRAs as Significant Issue

- "CIRAs"4 have no legal status. There is no regulatory or statutory support for restricting any lawful activity in these areas.
- By creating CIRA's as a significant issue, the alternatives that flow from the significant issues must be constructed to address them.
- The resulting alternatives, as presented in this DEIS, confirm our contention that the DEIS writers perception of what is significant is skewed by the insertion of unproven beliefs into the Purpose and Need. Thus, "CIRAs" were accorded far more importance than they are legally entitled to.

Response

The issue identification process followed regulations and Forest Service guidance (FSH 1909.15, 12.4). Factors other than legal standards may be used to identify significant issues. Public concerns about Citizen's Inventoried Roadless Areas are sufficient to consider it a significant issue in the analysis.

The EIS includes alternatives with trails in the CIRAs, including the Forest Service preferred alternative, Alternative 5.

Comment 10

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Land Designation and Management

Disposition: Resolved: Other (SEE RESPONSE)

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

Disingenuous Omissions
The insertion of CIRAs as a significant issue can easily be construed as a disingenuous way to influence the formulation of the alternatives. Why do we say that? Because:

- Subpart B of the TMR does not address motor trails in inventoried roadless areas because that issue has already been settled. Motor trails are allowed. It is the omission---the DEIS is silent on that prior decision---that is disingenuous. This silence reveals that the DEIS writers appear to want to circumvent that decision by changing "CIRAs" into something different than what they actually are.
-The concern about CIRA's is presented as -- adding new motorized trails would ruin the opportunities for solitude. Yet the conspicuously unstated fact is, no new motor trails would be added, because the motor trails already exist. Again, it is the omission that is disingenuous.
- If the PNF wishes to disregard 800 miles of trails, perhaps because some of them are "user-created, then the PNF must apply the same standard to the "user-created" roadless areas. That standard is, disregard them.
- The stated intent of the citizens who identified them is to create areas that are not open to everyone.
- By according CIRAs far more importance than they are legally entitled to, the DEIS writers are declaring that they intend to give preferential treatment to the philosophical beliefs associated with Wilderness, over and above all other beliefs (5 CFR Ch. XVI Subpart A--General Provisions, 2635.101(b)(8). This will most definitely rig the outcome of an analysis intended to study motorized access to the National Forest.

Response

On the Plumas National Forest, motorized trails are not constructed in inventoried roadless areas because these areas usually also fall within semi-primitive nonmotorized allocations in the Forest Plan.

The issue identification process followed regulations and Forest Service guidance (FSH 1909.15, 12.4). Factors other than legal standards may be used to identify significant issues. Public concerns about Citizen's Inventoried Roadless Areas are sufficient to consider it a significant issue in the analysis.

The EIS includes alternatives with trails in the CIRAs, including the Forest Service preferred alternative, Alternative 5.

Comment 11

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS Ch 2, Alternatives Considered in Detail, Alternatives Eliminated from Detail Study.

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.H.
Limited Alternatives

The Alternatives structure rigs the outcome such that making very few (or no) changes is the only available choice. It does this in five ways.

One, Alternative 3 proposes to add zero trails to the NFTS, yet there is no alternative that proposes the opposite end of the same scale---that is, proposes to add all of the trails to the NFTS. Incredibly, that alternative was discarded before the analysis.

Two, the preferred alternative keeps only 260 miles of the "approximately" 1,109 miles of existing routes found in the open area of the Forest (999,521 acres5).

Three, in the comparative tables in Chapter 2, the remaining 868 miles disappear! 70 percent of the mileage. Why is this very fundamental problem with this analysis? Because this is an analysis intended to support a "travel plan." A reasonable person would perceive this to mean that the entire 1,109 miles of unclassified roads and trails are the principle element of the analysis.

Four, the DEIS has no alternative which analyzes the existing condition. That condition is as follows: "cross-country travel" in mountain terrain is, in reality, repeated travel on the same linear paths over the course of many years, which resulted in the 1,109 miles of "unauthorized" trails in the open Forest. CEQ requires a detailed study of this existing situation in the DEIS.

Five, the DEIS evades the "existing situation" regulation by creating a technically lawful, but incomplete no-action alternative, and intentionally discarding the alternative that includes designating all unclassified routes.

Response

The No-action alternative analyzes what the comment is asking the Forest to do by providing a baseline for comparing the other alternatives. This alternative maintains the status quo and provides maximum access and motorized recreation opportunity. Under the No-action alternative, current management plans would continue to guide management of the project area. No changes would be made to the current NFTS and no cross-country travel prohibition would be put into place. The Travel Management Rule would not be implemented, and no Motor Vehicle Use Map (MVUM) would be produced. Motor vehicle travel by the public would not be limited to designated trails. Unauthorized routes would continue to have no status or authorization as NFTS facilities.

FEIS Ch2, 2.4.1 Designate All Inventoried Routes as Motorized Trails
As explained in the FEIS, a total of 1,107 miles of routes were inventoried and considered for inclusion into the NFTS. This alternative was eliminated from detailed study for the following reasons. It included many short routes that would not benefit the trail system. It included routes that had multiple resource issues and routes that originated on private land or that lead to private land.

In addition, it included routes that were not surveyed because the public did not show specific interest in them during public scoping and collaboration. From the 1,107 miles of inventoried routes, the interdisciplinary team initially suggested 220 miles of trails and solicited public input for additional trail suggestions. The proposed action included the 220 miles and 155 miles of additional routes proposed by the public. After public scoping, an additional 35 miles of routes were surveyed as possible trail additions. A total of 410 miles were surveyed for possible trail additions.
The extensive public involvement and collaboration process are discussed in Chapter 1.

Comment 12

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS, Ch. 1 Public Involvement

We [California Off Road Vehicles Association] regret to inform you that we have found considerable evidence of what is called "pre-decision" in the opening pages of the DEIS that we be believe this DEIS is beyond saving as it is currently published.

1.I.
Resolution Requested

As a responsible cooperator and participant, CORVA [California Off Road Vehicles Association] normally provides feasible solutions to resolve the issues we raise during the comment period. Unfortunately, the Forest Service has so flagrantly disregarded the CEQ standards for a NEPA analysis--before it even began the analysis---that this document cannot support a lawful Decision. Please withdraw this plan and analysis as an instrument to change the authority of the Plumas National Forest, and begin development of a CEQ-compliant analysis.

Response

All of the action alternatives in the EIS were developed with public participation and collaboration. Public involvement occurred during key periods: first during the public collaboration process that began in 2004, second

during the 60-day public scoping period for the Notice of Intent (NOI). During 2004 and 2005, the Forest also sought route information from the public and validated route locations and mapped them. On May 14, 2005, the Forest provided on-the-ground training for the public to locate and map their favorite riding areas so they could effectively provide that information to the Forest Service.

By April 2007, the Forest Service developed the initial proposal route map, which included 220 miles of proposed motorized trails. The initial proposal consisted of known routes used by the public, including destinations, loops, and spur routes to fishing access and favorite dispersed camping sites. The initial proposal avoided routes on private land with no right of way, routes where motorized use would conflict with existing uses, and routes with measurable resource impacts. Information meetings were held in Quincy, Portola, and Oroville in April. Followup workshops were held in each city during May.

In the spring of 2007, a series of three public meetings and three workshops were conducted to identify which of the routes and areas should become part of the proposed action, the type of use that each would have, and locations to be considered for dispersed recreation use per the new Travel Management Rule.

At the second set of workshops, individuals worked with Forest Service specialists to identify important routes. These meetings were held in Blairsden (May 2), Quincy (May 3) and Oroville (May 10). Groups shared their ideas and their various concerns. Roughly 300 people participated in these workshops. In early 2007, an e-mail update was issued sharing information on the meetings and the outcome. The Forest Service Interdisciplinary Team took this information and developed the proposed action for the NOI. The proposed action was designed to include as many routes as possible that were requested by the public, including some with known or suspected resource impacts.

After the 60-day comment period on the proposed action began presentations to a variety of groups, phone calls, news releases, website postings and emails were used to alert the public of the opportunity to comment on the proposed action. Public meetings were held in Blairsden (January 15), in Quincy (January 22) and in Oroville (January 29) to explain the Proposed Action. Over 3,300 comments were received. Many were identical emails.

Comment 13

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. 50% of Public Looses 75% of Opportunity

2 .A. Omissions, Faulty Assumptions and Misrepresentations

We [California Off Road Vehicles Association] would like the PNF to correct the following omissions, faulty assumptions, and misrepresentations in the DEIS:
- The DEIS has erred in determining the scope of the analysis.
- The DEIS is based on several fundamentally faulty assumptions.
- The DEIS has created irrational results by omitting accurate descriptions of the subjects under analysis (i.e. existing routes, OHV use, dispersed use, motorized and non-motorized access).
- The Forest Service has made the mistake of relying upon a statistically insignificant sample of the forest-visiting population to accurately select which routes will be added to the NFTS.
- This list is combined into one comment because its outcome is the failure to accurately and fully address the cumulative effects of the proposed action.

references
Please refer page 33 in the DEIS,

3.1.3 Assumptions and Limitations
Dispersed recreation activities (i.e. activities which occur after the motor vehicle stops such as: camping, hunting, fishing, hiking, etc.) are not part of the scope of the proposed action. The action and the analysis focus on motor vehicle use.

Now please refer to DEIS page 44. In the narrative for "Indicator Measure 4" we find that:

Motor vehicle access to dispersed recreation opportunity is reduced in all action alternatives (Table 10). The action alternatives result in a relative decrease in the number of dispersed recreation opportunities within 300 feet of proposed OHV trails by between 66 to 80%...

There are three problems here.

66 to 80% Change to Human Environment
The outcomes, described on page 44, causes the claim on page 33, that dispersed activities are outside the scope of this analysis, to be in error. Dispersed activities are within the scope since the DEIS writers have created this "Indicator Measure 4." Furthermore, Indicator Measure 4 reports a 66 to 80% change to the affected environment, a 66 to 80% change to the human environment, and a 66 to 80% loss of social benefits derived from National Forest Service lands access. The Deciding Officer may have declared dispersed recreation outside the scope, but the predicted outcome changes everything. Why? Because the diversity of publics who will be negatively affected by this reduction is staggering.

Existing vs. Proposed

The Forest Service evades the correct description of the existing roads and trails proposed to be added to the NFTS by calling them "proposed," and omitting the key part of the description, which is "existing." The roads and trails are already there. The PNF has the route inventory to prove it. If we are doing awkward language, and apparently we are, the DEIS needs to call these roads and trails by their proper name: "Existing Unclassified Roads and Trails Proposed For addition To the NFTS."

OHV Definitions
The term "OHV trails" is remarkably fungible, to the point of outright evasiveness. What is an OHV? What is an OHV route? What's the difference between an OHV trail and a road? Is a motorcycle single-track an OHV trail? Is a pickup with a camper an OHV? Why is this question important? Because 66 to 80 percent of the dispersed recreation opportunities will be lost.

Response

The term unauthorized route was used to identify routes that were identified but not on the NFTS. The term "proposed trail" was used to distinguish those unauthorized routes from those proposed in the alternative. "Proposed trails" will become part of the NFTS after the decision is signed. The assumption that this will not affect dispersed camping from occurring, was made to clarify that this decision is about the actual proposed trail additions and restricting cross-country travel not about whether recreation users can camp, fish, etc. once they get out of their vehicles as long as they are driving on NFTS roads and trails. This decision will not affect Forest users from the ability to do these activities.

Comment 14

Action: Methodology and Assumptions

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

2. B. Expected Negative Outcome

According to the NVUM report for this Forest, OHV was the primary activity for only 2,000 annual visits (DEIS p41). This combination of "input" and "outcome" is not rational:

- Statement: only 2,000 visits were for OHV activity.
- Assumption: OHV is a threat to forest health.
- Result: at least half of all forest visitors will lose access to the National Forest because the Forest Service proposes to "manage" OHV.

The DEIS method of addressing this negative outcome is to simply order people to expect something quite different when they visit the Forest. For example:

Page 41:
Visitors should expect that the potential non-motorized recreation experience may differ greatly among the alternatives.

Page 42:
Visitors should expect that the potential impacts to urban areas may differ greatly among the alternatives.

Page 42:
Visitors should expect that the potential recreation experience may differ greatly among the alternatives.
Following each of these statements is a narrative and a table displaying the Forest Service's declarations about the changes that "visitors can expect" between the different alternatives.

What these statements, declarations, and tables do represent is the Forest Service telling the public that the public is going to do it the Forest Service's way, or go somewhere else.

Response

Section 3.2.4 Affected Environment has been updated to include driving for pleasure. When motorized uses are combined, including OHV use, and driving for pleasure, the approximated number of visits is 190,300 or 28.5% and the main activity is 23,350 or 3.5%. Most of the driving for pleasure occurs on system Roads. Most of the non-motorized users travel to their chosen recreation area on system roads. Interviews occurred at major access points leading to the forest.

Comment 15

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. C. Determining Need

Statistically Insignificant Sample Rate

The number of visitors who perceive their visits in the context of these alternatives is utterly minute. 3,300 comments (many identical emails) and 300 people (refer to DEIS, Section 1.7 Public Involvement, p 7) represents four-tenths of one percent of the number of people who visited the PNF in 2005.

This is not a statistically significant sample. It does not represent the diversity of publics who like to go to the National Forest. It represents a self-selected group of activists. Some of those activists and organizations, such as CORVA [California Off Road Vehicles Association], represent a more diverse range of visitors because CORVA wishes to preserve vehicle access.

That means that even those people who report hiking as their primary activity are represented by CORVA, because while the DEIS skips this assumption, CORVA will not.

Comment 16

Action: Methodology and Assumptions

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Everyone needs motor vehicle access

Everyone needs motor vehicle access. The DEIS confirms this. Refer to DEIS page 38 3.2.3.1 Item # 2:
1. Proposed additions to the NFTS would have a beneficial effect on the motor-vehicle experience by providing a variety of riding experiences (variety of easy-to-difficult riding experiences) and contributing to the continuity of the motor-touring experience, including access to dispersed recreation activities (both motorized and non-motorized).

The text reads "non-motorized" activities will benefit if the Forest Service adds more roads and trails to the NFTS. But the Forest Service declines to give this part of the population its own assumption.

Analyzing only alternatives that were developed by the tiny sample reported on page 7, is faulty methodology. Why? Because when the Forest Service says "the public" did not express interest in a certain trail, road, or site, and leaves it out of the analysis; the Forest Service is writing the concerns and interests of 663,700 other people completely out of the analysis. We expect the government, in this case the Forest Service, to have a broader understanding of its duty to the public.

Response

The Interdisciplinary Team relied on public involvement to ensure that a full range of alternatives, representing a broad array of perspectives, would be analyzed. Public involvement occurred during three key periods: first during the public collaboration process that began in 2004, second during the 60-day public scoping period for the Notice of Intent (NOI), and third during meetings with public groups to explore issues they raised during scoping.
During the summer and fall of 2004, an independent contractor reviewed and mapped routes and areas used by OHVs on the Forest. During 2004 and 2005, the Forest also sought route information from the public and validated route locations and mapped them. On May 14, 2005, the Forest provided on-the-ground training for the public to locate and map their favorite riding areas so they could effectively provide that information to the Forest Service.
In December 2006, public meetings were held in Oroville, Portola, and Quincy explaining the temporary Forest Order (effective December 31, 2006) that restricted OHV use to mapped roads, trails and areas.
By April 2007, the Forest Service developed the "first cut" route map, which included 220 miles of proposed motorized trails. The "first cut" consisted of known routes used by the public, including destinations, loops, and spur routes to fishing access and favorite dispersed camping sites. The "first cut" avoided routes on private land with no right of way, routes where motorized use would conflict with existing uses, and routes with measurable resource impacts. Information meetings were held in Quincy, Portola, and Oroville in April. Followup workshops were held in each city during May

In the spring of 2007, a series of three public meetings and three workshops were conducted to identify which of the routes and areas should become part of the proposed action, the type of use that each would have, and locations to be considered for dispersed recreation use per the new Travel Management Rule. The concept of "mixed use" was also introduced during these meetings. At the first session of the two-part series, public meetings were held in Quincy (April 17) Portola (April 18), and Oroville (April 19). At the second set of workshops, individuals worked with Forest Service specialists to identify important routes. These meetings were held in Blairsden (May 2), Quincy (May 3) and Oroville (May 10). Groups shared their ideas and their various concerns. Roughly 300 people participated in these workshops. In early 2007, an e-mail update was issued sharing information on the meetings and the outcome. The Forest Service Interdisciplinary Team took this information and developed the proposed action for the NOI. The proposed action was designed to include as many routes as possible that were requested by the public, including some with known or suspected resource impacts.

In January 2008, the Forest Service completed the Proposed Action and Notice of Intent to Prepare an Environmental Impact Statement based on comments from the meetings held in the spring of 2007. The comment period on the

proposed action began on January 3, 2008, and ended March 3, 2008. Presentations to a variety of groups, phone calls, news releases, website postings and emails were used to alert the public of the opportunity to comment on the proposed action. Public meetings were held in Blairsden (January 15), in Quincy (January 22) and in Oroville (January 29) to explain the Proposed Action. Over 3,300 comments were received. Many were identical emails.

Comment 17

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

50% of visitors affected

In the NVUM, "General Forest Access" (Undeveloped Areas) appears to be the category that represents the people who prefer dispersed camping. We [California Off Road Vehicles Association] say this because dispersed recreation activities are dependent upon general forest access. While the NVUM does not enlighten us very well, we can conclude that based on the data in the NVUM, at least one- half of the people who visited the Plumas in 2005 fit into the General

Forest Access category.
When we put the NVUM data together with the reported effects of the proposed action, we realize that fully half (50%) of the present Forest visitors will find that the opportunities to pursue their preferred activity (camping, hunting, fishing, hiking, etc.) has been reduced by approximately 75%.

Response

No Plumas National Forest system roads (4200 miles) are affected by this project. The trails being added are being added for OHV driving opportunities, will only be a small reduction in access for most visitors to the Plumas National Forest.

Comment 18

Action: Methodology and Assumptions

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Forest Unable to Find OHV Visitors
Please refer to page 38.

3. The Plumas National Forest's National Visitor Use Monitoring (NVUM) report accurately expresses the most popular non-motorized recreation activities for analysis.

Now please note that the NVUM reports that it was very difficult to find and interview visitors whose primary activity is "OHV" (p5), or more precisely, riding motorcycles on single-track trails.
In fact, the NVUM found no one to interview. Perhaps these visitors are the human version of the kit fox or the lynx---shy, averse to crowded places, sensitive to human disturbance.

All kidding aside, our point is, DEIS Assumption # 3 is faulty. The NVUM does not accurately express the most popular activities; and the NVUM states very clearly that it does not; and it states very clearly exactly what areas are known to be inaccurate. How this clearly-stated limitation translates into the DEIS assumption that the NVUM accurately reports visitor activities is not disclosed in the DEIS.

Response

Section 3.2.4 Affected Environment has been updated to include driving for pleasure. When motorized uses are combined, including OHV use, and driving for pleasure, the approximated number of visits is 190,300 or 28.5% and the main activity is 23,350 or 3.5%. Most of the driving for pleasure occurs on system Roads. Most of the non-motorized users travel to their chosen recreation area on system roads. Interviews occurred at major access points leading to the forest.

Comment 19

Action: Methodology and Assumptions

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. D. USFS getting rid of ½ its customers

The PNF is either irresponsibly unaware, or intentionally not disclosing the outcome of the proposed action. Why do we say that? Because the proposed action will indeed get rid of people who like to ride their motorcycles on trails (those whose primary activity is "OHV"). In so doing, the Forest Service will also get rid of at least half of all its other customers. Now why the heck does the Forest Service want to do that? We [California Off Road Vehicles Association] contend that the DEIS is supposed to tell us why. The DEIS does not. The DEIS completely disregards this predicted outcome.

Comment 20

Action: Methodology and Assumptions

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. E. Cross Country Travel vs. Repeated Use

The second credibility issue with the data presented on page 44 is the footnote to Table 10:

Approximately 91 inventoried dispersed recreation sites can be accessed via motorized cross-country travel.
This footnote would cause a reasonable reviewer to, yet again, wonder if the PNF staff is telling the truth; or perhaps, to wonder what the PNF staff perceives the truth to be. We [California Off Road Vehicles Association] say this because the 91 inventoried sites are not accessed by cross-country travel. The sites are accessed by a linear route, which was created by the repeated, and lawful, passage of vehicles ("unplanned roads").

We know this because these 91 sites were "inventoried." How were they inventoried? The PNF identified the sites that are used over and over (repeated use) by visitors who prefer dispersed recreation. That is how it became an identifiable "site" that could be "inventoried." How do the visitors and the PNF employees find the sites? They drive to them. On a road.

The road was created by repeated use of the same linear path during the last 50 years, specifically to access the established site that the PNF inventoried. We know a road is there because if the proposed action is implemented, the DEIS says on page 44 that…motor vehicle access to dispersed use areas would directly impact recreationists with campers and trailers.

People driving campers and pulling trailers do not attempt to drive "cross-country." The limitations of a vehicle with a camper and/or a vehicle-trailer combination mean that they must be operated on well-established roads. In other words: The site is so well established that it can be identified and inventoried. The way people get to the site is on a road. The road is in the PNF inventory of the 1,109 miles of "unauthorized routes." That is why the DEIS writers tell us on page 44 that dispersed recreation opportunity will be reduced by 66 to 80 percent. It will be reduced by 66 to 80 percent (and up to 89 percent near streams) because the existing road to the established site will be closed by the proposed action.

Comment 21

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Driving on a road is cross country travel

How many ways do we [California Off Road Vehicles Association] have to describe this in order to make sure that the DEIS writers realize that they are not fooling anyone? The persistent refusal to describe the affected environment, as it presently exists, is destroying this analysis. The Forest Service says driving on existing roads and trails is cross-country travel. The Forest Service has changed the name of these roads and trails to "unauthorized;" Not Congress; Not the DEIS; and not any Decision. The process to make any of it "unauthorized" has not been completed.

To put it bluntly, the DEIS statement on page 44, that these sites are accessed by cross-country travel, is false. Making false statements in a government matter is a violation of 5 CFR Ch. XVI Subpart A 2635.902 (v).

Response

36 CFR Parts 212, 251, 261, and 295 Final Rule: Travel Management; Designated Routes and Areas for Motor Vehicle Use (November 9, 2005) requires designation of those roads, trails, and areas that are open to motor vehicle use.The prohibition on cross country travel is required by 26 CFR 261 § 261.13 Motor vehicle use. “After National

Forest System roads, National Forest System trails, and areas on National Forest System lands have been designated pursuant to 36 CFR 212.51 on an administrative unit or a Ranger District of the National Forest System, and these designations have been identified on a motor vehicle use map, it is prohibited to possess or operate a motor vehicle on National Forest System lands in that administrative unit or Ranger District other than in accordance with those designations, provided that the following vehicles and uses are exempted from this prohibition."

Comment 22

Action: Methodology and Assumptions

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Plumas Wants Visitors to Go Away

Adding to the tiny suspicion that some other agenda is concealed in the proposed action, the description of dispersed recreationists trends a little too obviously toward pejorative:

These visitors preferred... the lack of development, fees, regimentation, control, and greater privacy and the freedom to engage in activities that may conflict with others in developed locations, such as OHV use, bringing along a noisy dog, and occupying the site in a manner that meets their needs. In addition, dispersed recreation areas provide large groups better opportunity to camp in close proximity to each other, and away from others, than do most developed group campgrounds.

From this description, it appears that the PNF is happy to have those people go elsewhere. It appears that the PNF plans to change the present Affected Environment to a place where the visitors conform only to the DEIS writers' standards of behavior: Obedient, restricted to the developed campgrounds, don't use OHV's, don't make too much noise, and do not behave in ways the DEIS writers consider unacceptable (for example, occupying the site to suit their needs and not the way the DEIS writers approve of). The assumption that these visitors do things that conflict with others is a revealing bit of speculation.

Comment 23

Action: Cumulative/Combined Effects

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. F. Failure to Address Cumulative Effects

Now we turn to the most egregiously shortsighted part of the cumulative effects analysis for recreation.

References
DEIS Cumulative Impacts
Refer to page 46:

3.2.5.6.1 Cumulative Effects for all Alternatives

The cumulative effects analysis for recreation considers impact of the alternatives when combined with the following past, present, and foreseeable future actions and events: National Forest System trails and inventoried routes, on the ground management decisions, road and trail maintenance, road and trail construction, and population growth. These actions were selected because they have caused or have the potential to cause changes in recreation opportunities, public access or the creation of routes on the ground. The geographic scope (Forest-wide) of the cumulative effects analysis was selected because impacts to the recreation system in one area of the Forest can affect the continuity of the system and public access opportunities in other areas. The temporal scope was selected because impacts to recreation and public access can continue over time. By identifying existing inventoried routes during the route inventory, we [California Off Road Vehicles Association] captured the network of routes attributed to past recreation use Forest-wide.

Plumas As an Island

Now refer to DEIS page 4, which displays the location map for the Plumas National Forest. In this map, it appears as though the Plumas exists all by itself, and we see no other National Forests in the map.

Visitors will Go Elsewhere
Now refer to the NVUM, p18, Table 18.

Table 18. Substitute Behavior Choices of Plumas National Forest Respondents (NVUM FY 2005 data).

Note that the answer to the question, "What would you have done if you could not come to Plumas National Forest for recreation." Fifty-two and 4/10th percent (52.4%) of the respondents said they would go elsewhere to do the

same activity.

Regulatory Definition of Cumulative Effects

This is the heart of the Plumas DEIS's failure to address the cumulative effects of any of the action alternatives. Why? Because the Plumas shares its southern and northern boundaries with the Tahoe and the Lassen National Forests. These in turn, share boundaries with the Tahoe Basin Management Unit, Eldorado, Inyo, Toiyabe, Stanislaus, and the Sierra National Forest. In close proximity to the north of the Lassen are the Shasta and Modoc. National Forests.
Now refer to page 31 of the DEIS, 3.1.2 Cumulative Effects.

According to the CEQ NEPA regulations, the definition of "cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions (40 CFR 1508.7).

The cumulative effects analysis area is described under each resource, but in most cases includes the entire Plumas National Forest including private and other public lands that lie within the Forest boundary. Past activities are considered part of the existing condition and are discussed in the "Affected Environment (Existing Conditions)" and "Environmental Consequences" section under each resource.

The document refers to Appendix C to find out the present and reasonably foreseeable future actions potentially contributing to cumulative effects. Appendix C is a table that lists the present and reasonably foreseeable future actions that this DEIS is using to estimate the cumulative effects of any of the Action alternatives. No actions are listed for any agency other than the Plumas National Forest.

Omitted Effects of the (Nationwide) Travel Management Process

The Plumas DEIS has failed to follow the 1508.7 requirement, because the Plumas DEIS has failed to include in Appendix C and in its analysis of cumulative effects the fact that all of the Forests listed above, and every other Region 5 Forest (18 total) are preparing Travel Management Plans. In the Plans we have reviewed to date for Region 5 only, every Forest is planning a substantial reduction of motor access, and some are planning a reduction of as much as 50 percent. We have no reason to believe the others will not propose drastic reductions also. The reason we say that is, each of the R5 DEIS's (except the Eldorado) is written to what appears to be a Region-wide template, because the language, structure, and outcomes are all nearly identical.

Yet outside Region 5, the DEIS' published so far do not reflect any such template, either in structure, language or outcomes. Because of this demonstrated difference, we know the Plumas is fully aware that every adjacent forest plans to reduce motor access.

Comment 24

Action: Cumulative/Combined Effects

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. G. Failed to Address User Misplacement

Referring back to the NVUM question, 'where would you go instead?' The Forest Service response is…no answer at all. The Plumas DEIS has failed to address the cumulative effects of such a sweeping Region-wide reduction in NFS land access.

CFR Regulation defines effect to include

…ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.

In sum, the Forest Service has not addressed the long-term effects of this dramatic reversal of historic, lawful forest access for everyone regardless of which of the action alternatives are selected. The PNF provides no alternative that will answer this problem.

It appears as though the PNF expects a lot of people to "go elsewhere for the same activity." Except that in Region 5, there is no "elsewhere" to go. All the Forests will be closed. All the Forests will become more roadless. All the Forests will concentrate visitors in under-funded, poorly maintained developed sites. All the Forests will concentrate motor vehicles on a vastly reduced transportation system.

Response

Section 3.2.4 Affected Environment has been updated to include driving for pleasure. When motorized uses are combined, including OHV use, and driving for pleasure, the approximated number of visits is 190,300 or 28.5% and the main activity is 23,350 or 3.5%. Most of the driving for pleasure occurs on system Roads. Most of the

non-motorized users travel to their chosen recreation area on system roads. Interviews occurred at major access points leading to the forest.

Comment 25

Action: User Conflict

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2 .H. Overuse

Concentration

What happens when we concentrate too many people in small areas? The Forest Service is silent. Yet accurate information based on experience, not theory, is readily available;
- Sanitation declines,
- Health and safety problems crop up,
- Garbage accumulates,
- Thefts occur,
- Dogs bark, fight, and bite people (usually kids),
- People fight with each other, and in surrounding area
- We have an expanding zone of severely altered forest environment.

Response

4500 miles of Plumas National Forest System roads and trails will be available for public use following implementation of this project.

Comment 26

Action: Traffic control and safety

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

2 .H. Overuse

Traffic Increases

What happens when vehicle traffic increases on any given route, in any transportation system? The Forest Service is silent on this issue, yet the road research cited in this very DEIS is replete with answers;
- The route becomes degraded,
- It requires more maintenance,
- Maintenance causes increased erosion,
- Smooth, recently maintained roads increase vehicle speeds, and
- Increased vehicle speeds cause minor safety issues to become major safety problems.

Response

4500 miles of Plumas National Forest System roads and trails will be available for public use following implementation of this project.

Comment 27

Action: Cumulative/Combined Effects

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2 .H. Overuse

Shift in Responsibility

What happens to the government liability situation in this severely restricted designated route system? The Forest Service is telling the public, you must use only these routes or be prosecuted. This is an enormous shift in

responsibility: from a public that formerly was expected to take care of itself, to the government requiring specific behavior under penalty of law. In matters of motor vehicle transportation, this seems like a change that cannot be disregarded.

We [California Off Road Vehicles Association] do not have the time or resources to list or even guess at the potential for extremely negative cumulative impacts of this action, when considered alongside the same action occurring in the same time frame (temporal space) on every Region 5 Forest. The Forest Service may believe that the effect will be beneficial, but the Forest Service has not actually examined the matter. In fact, the Forest Service has not even considered it.

Response

4500 miles of Plumas National Forest System roads and trails will be available for public use following implementation of this project.

Comment 28

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. J. Resolution

Here is what will satisfy our issues:

Please state in clear and plain words,

"Dispersed sites are accessed by roads and spurs that were lawfully created by the repeated passage of vehicles in the 'open to cross-country travel' Forest during the past 50 years."

Comment 29

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. J. Resolution

Here is what will satisfy our issues:

Please remove the unsupported (speculative) claims that visitors who prefer dispersed camping enjoy activities that conflict with other visitors.

Comment 30

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. J. Resolution

Here is what will satisfy our issues:

Please remove the unsupported claim that using OHV's conflicts with other visitors. This is impossible---according to this DEIS, every motor vehicle is an OHV.

Comment 31

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. J. Resolution

Here is what will satisfy our issues:

Please include in the DEIS, an analysis of the effects of this outcome:

"50% of all Forest visitors will have their preferred recreation opportunity reduced by 66 to 80 percent75%."

Comment 32

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

2. J. Resolution

Here is what will satisfy our issues:

Please use the correct terms for the trails and roads that exist: that term is "existing."

Comment 33

Action: Cumulative/Combined Effects

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

2. J. Resolution

Here is what will satisfy our issues:

Please analyze the cumulative effects of this Region-wide reduction in National Forest recreation opportunity. We [California Off Road Vehicles Association] listed some of the known effects in this comment.

If the DEIS writers do not wish to analyze these effects, please add this statement to the FEIS:

One predicted outcome of the preferred alternative is that approximately half of all Forest visitors will no longer be able to pursue recreation activities such as camping, fishing, hunting, hiking, and so forth, in any National Forest in California. However, the Forest Service has elected to disregard the consequences of that outcome. A number of other predictable outcomes include declines in sanitation, safety, and site degradation due to crowding. The Forest Service has elected to disregard these consequences also.

Response

4500 miles of Plumas National Forest System roads and trails will be available for public use following implementation of this project.

Comment 34

Action: NEPA Process General

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

3. Misrepresentation of CEQ Regulations

We [California Off Road Vehicles Association] would like several corrections to the DEIS before the FEIS is published.
3. A. Non CEQ Compliant 'Higher Level Decision'

Defining Significant Issues

Please refer to page 8, paragraph 1 of the DEIS:

Significant issues were defined as those directly or indirectly caused by implementing the proposed action. Non-significant issues were identified as those: (1) outside the scope of the proposed action; (2) already decided by law, regulation, the Forest Plan, or other higher level decision; (3) irrelevant to the decision to be made; or (4) conjectural and not supported by scientific or factual evidence. The Council on Environmental Quality (CEQ) NEPA regulations explain this delineation in Sec. 1501.7, "…identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)…

Other Higher Level Decision Error

This is in error. CEQ Section 1501.7 does not say "or other higher level decisions." It says:
Identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review. (Emphasis added)

[Section] 1501.7 says nothing about
1) outside the scope of the proposed action; (2) already decided by law, regulation, the Forest Plan, or other higher level decision; (3) irrelevant to the decision to be made; or (4) conjectural and not supported by scientific or factual evidence.

[Section] 1501.7 does say that the decisions which the PNF intends to use to eliminate some issues from detailed study must be covered by a prior environmental review. The standard in this case, is a NEPA compliant document complete with public participation and either a FONSI or a ROD. Please correct this misrepresentation. "Higher level decisions" is not a CEQ term, nor is it in compliance with the disclosure requirements of a CEQ compliant document.

Standards Implementing Criminal Penalties

We find the text of [section] 1506.3 dangling at the end of paragraph one page 8, with one provision that the PNF obviously hopes to utilize:

[Section] 1506.3 Adoption.

(a) An agency may adopt a Federal draft or final environmental impact statement or portion thereof provided that the statement or portion thereof meets the standards for an adequate statement under these regulations. [[sic]]
The vague and undefined 'Higher Level Decisions' do not meet the standards required for new regulations which will cause forest visitors to be subject to new criminal penalties. Any proposed action which causes any person to be subject to new criminal penalties is held to the highest standards of public review.

3. B. Secretive Higher Level Decisions

What higher level decisions? Made by whom? We will remind the Forest Service that it does not have a private right to act in these matters. When proposed new regulations will impose new criminal penalties upon any person, "higher level decisions" are not admissible. NEPA is the single last protection the electorate has to protect itself from unilateral, arbitrary or capricious decisions made by individuals under the color of their authority as Executive branch employees.

[Section] 1501.7 does say that the issues eliminated by prior environmental review must be identified. The DEIS fails to do so. In fact, by calling out the CEQ regulation, and then disregarding it, the DEIS is concealing the prior reviews.
A reasonable person might wonder why. Our contention will be, but not limited to or by, the speculation that there are no prior environmental reviews that eliminate any of the issues (i.e., the 1,109 miles of inventoried roads and trails) from consideration. The PNF wants reviewers to think there are, because it says so on page 8 of the DEIS, but if there are, why not simply comply with the CEQ regulation at 1501.7 as cited by the DEIS writers?

3. C. No Prior Decisions to Reference

Why do we suggest that there are no prior decisions that meet the standard? Because the PNF is an "open" forest. No forest visitor has ever been restricted to even the existing trails.
In fact, the DEIS never provides an explanation or a definition that differentiates the "system" roads and trails from the "unclassified" roads and trails.

Phrases like "authorized by the Forest Service" and "included in the NFTS" do not satisfy any reasonable requirement for the definition of what a "system" road or trail is.

The DEIS does not tell us how (what process, standard, or criteria was used) for any particular road or trail to be selected for inclusion in the NFTS. If there is a difference, the DEIS would tell us that difference. The DEIS does not.

3. D. Resolution

What the Forest Service can do to resolve this comment:
1. Remove the above claim about "higher level decisions."
2. Dis-associate from the CEQ regulations cited the following statements:

(1) outside the scope of the proposed action; (2) already decided by law, regulation, the Forest Plan; (3) irrelevant to the decision to be made; or (4) conjectural and not supported by scientific or factual evidence,

3. Comply with 1501.7 by providing in the Travel Management FEIS the name, EMS identifier, Federal Register publication date, and the issues covered by every single prior environmental review that is pertinent to the 1,109 miles of unclassified routes called out in this DEIS.
4. Explain clearly and succinctly why and how these decisions eliminate the issue in question from detailed study in

this DEIS.
5. If the PNF has no prior decisions which fulfill the cited CEQ standards, please add the following statement:

"At 1501.7, the Forest Service is required to identify issues which have been covered by prior environmental review, and to explain why they have no significant effect and why they are not studied in detail. The PNF has no prior environmental reviews that would eliminate any of the 1,109 miles of unclassified routes from detailed study in this DEIS. Therefore, we will withdraw this draft document and prepare a supplemental EIS, in which the single most significant issue, the subject of this analysis (the 1,109 miles of inventoried roads and trails) is studied in detail."

Comment 35

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

4. Research Corruption aka Gaines Lie

4. A. Misrepresented Research

In the short time allowed for review of the Plumas DEIS, we have uncovered an unfortunate situation. We [California Off Road Vehicles Association] have confirmed two incidents of misrepresented research, and we have confirmed one incident in which the "best available information" is completely disregarded, and replaced by conjecture.

Examples from DEIS

We will start with several quotes from the DEIS.
Page 165 of the DEIS, Table heading:

Table 52. Road and trail-associated factors with disturbance and activity type and affected wildlife group.

Table 52 is then footnoted:
Based in part on Wisdom et al 2000 In Gaines et al 2003. [sic]

Page 166,
3.7.4.1 Wildlife Analysis Assumptions

All vehicle types result in approximately the same amount of disturbance effect to wildlife.

Page 170,
3.7.5.3.1 Effects Common to All Wide-ranging Species
.... For this analysis, it is assumed that all vehicle types result in the same disturbance to wildlife....

Page 178 of the DEIS:
3.7.9.3 Analyzing for Cumulative Effects
….This analysis assumes all motorized routes or trails have the same impact on old forest species.

Page 184 of the DEIS:
3.7.11 Spotted Owl: Environmental Consequences
Gaines et al. (2003) reviewed studies on the Northern spotted owl and determined that road and trail associated factors that were likely to affect spotted owls were collisions, disturbance at a specific site, physiological response, edge effects and snag reduction.

We will call these a sufficient sample.

4. B. Actual Gaines Research

Each of these statements cites Gaines et al as the source research for the assumption that all routes, roads and trails cause an equal amount of disturbance.

Since any reasonable, disinterested person can see the differences between a road and a trail, we thought we should check the Gaines research.

Here is an excerpt from what Gaines et al actually says. Since goshawks and spotted owls receive considerable discussion in the DEIS, we chose those table excerpts for our example.

At page 26 of Gaines:

Table 11—Road- and trail-associated factors for late-successional habitat-associated focal species

Gaines Misrepresented and Misused

Perhaps you see what we are getting at by now; the assumption that roads and trails have the same effect is not what Gaines says. In fact, Gaines takes great pains to separate the differences between the effects of roads and trails, and the list (Table 11) confirms that there are significant differences between roads and trails. The entire

table is on page 26. We suggest that the Forest Service read it.

Perhaps we can make our point clearer by reprinting Dr. Gaines' intentions for his synthesis. At page 30 of the Gaines 2003 synthesis he says:

Monitoring and Adaptive Management

Until additional research becomes available, the assessment processes identified should be considered as working hypotheses on which monitoring could be designed to test their validity. For example, the influence that roads have on the availability of late-successional habitat structure adjacent to roads as a result of snag cutting and tree felling for firewood or traffic safety could be monitored to determine the validity of the habitat loss index. In addition, the concept of security habitat could be evaluated by monitoring the demography of focal late-successional species in areas identified as security habitat compared to those in areas that are not security habitat.

The importance of this statement cannot be emphasized enough: Gaines is telling us that the purpose of his synthesis and case study is to show individual Forest staff specialists how to find out what the assumptions should be. It is not the source research for the assumptions themselves.

This research synthesis was never intended to be a project planning tool, yet in the DEIS that is exactly how it is being used.

4. C. Corruption of Scientific Method

Why is this wrong? Because in the PNF DEIS, the Forest Service has taken the hypothetical and made them fact. They are not fact, and Gaines states this in very clear terms at the conclusion of every chapter in his synthesis. Shifting his concept from a monitoring model, to a project planning tool, with the intention of "screening out" any activity that lies within the hypothetical polygons, is a gross mis-use of the report and it is an appalling corruption of scientific method.
It appears that the Forest Service needs an English language lesson: "Hypotheses" is not synonymous with "planning." "Monitoring" is not synonymous with trail "designation standards." "Testing a hypothesis" is not synonymous with "project implementation."

Invention of Effects is Un-supported by Science

Yet the misrepresentation of the monitoring model is not even the worst of the problems this DEIS has with its use of the Gaines synthesis; The Forest Service has chosen to omit the most important findings in the Gaines synthesis. In none of the studies in Gaines' synthesis is there a correlation—no causal relationship-- between any of the trail-based recreation activities and irretrievable loss, and there is no evidence that the "effects" are even negative.

That is why Gaines does not even call them "effects." He calls the "interactions," precisely because no one knows. That is to say, if a hiker or a cyclist causes an animal to move 350 feet, so what? Many biologists ask this question (Dill and Frid, 2002 Human-caused stimuli as a Form of Predation).

4. D. Problems in DEIS related to Gaines Misrepresentation

This causes some complications for this DEIS:
1. The Forest Service is making fundamental assumptions that are not supported by the cited research.
2. The research cited by the Forest Service shows an explicit and significant difference in effects between roads and trails.
3. In fact, the tables from Gaines et al have two completely separate categories for roads and for trails. Thus, the assumptions upon which the analysis for effects on wildlife are based, are not only incorrect, they are falsely presented.
4. This causes the Assumption on page 166, which the DEIS uses for the basis of its analysis, to be false.

Analysis has no Rational Connection to Facts

To put it bluntly, building the wildlife effects analysis upon false assumptions causes the wildlife effects analysis to be flawed. We mean "flawed" in the context of, causing the conclusions of the analysis to have no rational connection to the facts before the agency.

Regulatory Misconduct

Two regulations relating to this rather egregious misrepresentation come to mind:
1) 40 CFR 1502.24 Scientific integrity.
2) 5 CFR Ch. XVI 2635.902(v) Prohibitions against fraud or making false statements in a Government matter.

How many more examples would we find if we had more time?

4. E. Disregard of Cited Research

Searching for the word "unknown" in the wildlife effects analysis, we find an interesting statement at page 171 of the DEIS:

Although the tolerance of Sierra Nevada red fox to the presence of humans is unknown, it is evident that the non-native red foxes thrive in human-altered environments (Lewis et al. 1999, Kamler and Ballard 2002). In addition, urban development within the range of Sierra Nevada red fox may pose a risk to the species through an increased risk of predation from domestic pets, disease transmission, automobile collisions and other human-wildlife conflicts.

The Forest Service is saying that it does not know, but cites the research that is available (best available information); which tells us what we actually do know-- the red fox thrives in human altered environments. Then the Forest Service proceeds to tell us that "in addition" (in addition to what? Maybe we should check the research?), human-altered environments "may pose" a risk to the native red fox populations anyway. On the other hand, maybe the Forest Service means that the mere presence of humans is the risk, and altering the environment has nothing to do with it.

Flowing from that complete disconnect, the Forest Service disregards the cited research and instead lists a potpourri of "possible" human-caused risks to red fox populations, which happen to be the same risks the Forest Service claims that humans have on everything else that lives in the forest, which are all bad. The "side effect" of this Forest Service pattern of "risk" listing is the devaluation, and subsequent disregard, of real risk.

4. F. Conjectural Listed Effects

And still the Forest Service won't quit; continuing further down this road of irrationality, all of this discussion is pursued even though the "best available information" already told us that the red fox populations that we do know about - thrive in human-altered environments, and we are not analyzing "human altered environments (i.e. urban developments). We are analyzing trails in a forested environment whose effect on the habitat types needed by the red fox are entirely conjectural. We contend that all of this is purely conjectural, as defined in CEQ section 1502.22.

Why are these listed effects conjectural? Because the analysis does not distinguish between roads 25 feet wide and trails one foot wide.

Another random check--and another Forest Service claim, that runs counter to the best available information.

4. G. Constraint of Public Scrutiny.

This may explain why the Forest Service has chosen to disregard Section 6 of the NFMA, which requires a minimum of three months for public review for all LRMP planning documents including LRMP amendments and resource plans, as well as 40 CFR [section] 1506.10 (b) (1) b)

No decision on the proposed action shall be made or recorded under §1505.2 by a Federal agency until the later of the following dates: (1) Ninety (90) days after publication of the notice described above in paragraph (a) of this section for a draft environmental impact statement.

It appears as though the Forest Service has a very specific need for constraining public scrutiny.
4. H. Random Checks Result in Integrity Questions

Checking one reference in this DEIS, at random, is similar to checking the oil level in your vehicle (pardon the association). You can't be looking at the oil level all the time, but if it is okay when you do check, it is safe to assume it is okay all the time between checks.

In the case of this DEIS, the first one we checked was not okay. We checked again, and again, we found the Forest Service carrying on with elaborate discussions in complete disregard of the research it cites. If the DEIS were a vehicle, we would take it to a mechanic and have it overhauled, because the random samples we documented above is exactly like finding your vehicle with no oil. The vehicle is seriously damaged.

In this DEIS, the assumptions upon which the entire wildlife effects analysis is based are so egregiously wrong, it calls into question the very foundations of how roads and trails were analyzed in this DEIS. It casts doubt upon the integrity of the entire analysis.

4. I. Resolution

As a responsible and cooperating participant, CORVA prefers to provide feasible solutions to the concerns we raise in our comments. However, the above documented frauds are too fundamental to the analysis to accept the document as it is currently published. We want the Forest Service to withdraw this document as an instrument to change the authority of the Plumas National Forest and as an instrument to fulfill the requirements of the TMR.

Response

Lumping of Road and Trail associated factors from Gaines, et. al. 2003:

The FEIS does refer to table 3 on page 6 of Gaines, et al. The commenter references Gaines, et al at page 26 which provides a table that separates out road associated factors and motorized trail associated factors related to a suite of wildlife species. The FEIS will be edited to reflect the table on page 26 and the table in the appendix of Gaines, et al 2003. Motorized trail associated factors will be used in analyzing the direct and indirect effects from the alternatives, while road associated factors will be used in analyzing the cumulative effects for wildlife species.

Monitoring and adaptive management and corruption of the Scientific Method:

We agree with the commenter that factors identified in Gaines, et al 2003 are potential effects and not conclusive effects. Thus, the factors are used as indicators in the FEIS which provide a quantified method of comparing the relative differences between alternatives and assessing coarse magnitudes of effects. In most cases, Gaines et. al was used as a reference or guide, not an absolute analysis tool. The Wildlife Analysis reviewed information from Gaines and other researchers, but in most cases settled on existing Forest Plan standard & guidelines to arrive at evaluation criteria to analyze the effects of route designation. For example; effects to breeding goshawks were

analyzed within a 0.25 mile distance from known activity centers (e.g. standard & guideline 76, 77 and 82). This evaluation criterion was used to analyze and disclose the potential effects of designating routes on breeding Goshawks. Evaluation criteria used in the wildlife analysis was not solely based on Gaines, et al 2003, but Gaines was referenced based on the habitat parameter evaluated or the habitat needs of the species evaluated.

The commenter states that "This research synthesis was never intended to be a project planning tool" when references the Gaines et al. 2003 paper. However, in the Gaines, et al 2003 summary, the author states "The information provided in this review, and subsequent development and application of cumulative effects models, improves the knowledge base that can be used to evaluate project proposals and make informed decisions." Further, Gaines et al. 2003 continues "The findings of our review agree with the findings of other reviews." Thus we disagree that we've inappropriately referenced or used the literature-based elements from Gaines et al. 2003.

Sierra Nevada Red Fox:

The commenter is misinterpreting the text on page 171 of the DEIS with regards to the native Sierra Nevada red fox and the non-native red fox. It is the non-native red fox that was imported into California that is known to thrive in human-altered environments. The text reads correctly in the DEIS, yet the commenter mis-read or misinterpreted the text. The FEIS will separate the discussion between the native red fox and the non-native red fox as to not confuse the commenter in the FEIS.

Constraint of Public Scrutiny:
The Plumas NF Travel Management EIS is not a forest plan amendment or resource plan, therefore no minimum three month public review standard applies.

The forest respectfully disagrees with the commenter statements that suggest the wildlife analysis is so flawed that it should be withdrawn and re-done. Based upon clarifications of the commenter's errors (e.g. native vs. non-native red fox) in interpretation and errors in fact, we did not find a need to consider withdrawing the analysis; however the commenter did raise some issues (e.g. road vs. trail associated factors) that will be corrected in the FEIS.

Comment 36

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

5. Orwellian Swap

We [California Off Road Vehicles Association] want to point out to you a serious mistake in the construction and language of the PNF Travel DEIS.

5. A. All Routes are Currently Legally Open

The current management situation is that the public use of all forest roads and trails is 'open to everyone' there is no prior or underlying agreement or decision that a road or trail is by "default" not designated for motorized use. The normal designation for every route in every Forest was and still is -- it is open to everyone.

The Forest Service must take a separate, discrete action to "un-designate" a route in order to stop motorized use.

Background Reference
To understand the background for our comment, please refer to the following:

1. Page 1 of the Plumas Travel Management DEIS:
Unmanaged motor vehicle use, particularly OHV use, has resulted in unplanned roads and trails,

2. Page 1 of the Plumas Travel Management DEIS:
..Region-wide effort to "Inventory and designate OHV roads, trails...

3. Code of Federal Regulations: Title 36 – Parks, Forests, And Public Property:
...-Prohibitions, Subpart A (36 CFR 261.13) of the final rule prohibits the use of motor vehicles off designated roads, trails and areas, as well as use of motor vehicles on roads and trails that are not consistent with the designations.

4.Now please refer to the maps of the routes open to motor vehicles during PNF temporary closure 18-08: In the map legend, we are directed to use the inventoried non-System routes.

5. Now please refer to the Programmatic Agreement Among the U.S.D.A. Forest Service, Pacific Southwest Region, U.S.D.A. Forest Service,

Intermountain Region's Humboldt-Toiyabe National Forest, California State Historic Preservation Officer, and Advisory Council on historic preservation regarding the process for compliance with Section 106 of the National Historic Preservation Act for designating motor vehicle routes and managing motorized recreation on the national forests in California (aka R5 and SHPO programmatic agreement) at chapter ii, designating motor vehicle routes:

The inventory, evaluation, protection, and management of historic properties under the Regions' multi-year program to designate Motor Vehicle Routes from their inventory of Forest Service system roads and trails, unclassified roads, non-system trails, and off-route use areas in California…

At page 2 of the PNF DEIS:

The Plumas National Forest has 999,521 acres currently open to cross-country travel by motor vehicles.

At page 3 of the PNF DEIS:
[....and the] Roads Analysis Process (RAP) ..... resulted in decommissioning 56 miles of system roads and 91 miles of unclassified roads.

5. B. New Definition is Invented

However, on pg. 2 of the 2009 PNF Travel Plan DEIS, the routes inexplicably, and for the first time ever, become something different:

On National Forest System (NFS) lands managed as open to cross-country motor vehicle travel, unrestricted, repeated motor vehicle travel has resulted in unplanned, unauthorized routes and areas (roads, trails and areas).

Why do we say for the first time ever? Because in addition to the background outlined above, a brief review of the documented history and engineering analyses of roads and trails on NFS lands never calls motor vehicle use "unauthorized."

Examples:
- PNF Land and Resource Management Plan (LRMP) pg. 3-6:
ORV use occurs throughout the Forest except on that 13% closed for resource protection needs.
- PNF LRMP pg. 4-3:
This desired future condition is embodied in the following goals: Allow use of off-road vehicles wherever user conflicts or unacceptable resource damage is unlikely.
- PNF LRMP page 4-63, 'Wilderness Prescription/Description/Recreation':
Allow no motor vehicle use. Post boundaries and establish physical controls to prevent motorized entry.
- PNF LRMP pg 4-83 Rx-5. Recreation Area Prescription

Description: Recreation Areas: [lists 11 areas totaling 48,400 acres]:

Administer facilities to accommodate large numbers of motorized vehicles. Confine vehicle use to interior roads and spurs. Allow ORV use of trails that lead to adjacent off-road vehicle routes or acceptable cross-country areas.

From page 6 of the NATIONAL FOREST ROAD SYSTEM AND USE (Washington Office Engineering):

Other Forest Roads, or "non-System" roads, include public roads (state, county, and local jurisdiction), private roads, and un-inventoried roads....Un-inventoried roads are a complex mixture of un-engineered travel ways not claimed by a public road agency and not needed for forest management. These include remnants of short-term roads associated with fire suppression, timber harvest, and oil, gas or mineral activities, as well as travel ways resulting from off-road vehicle use.

Assumption of Public Use is Shattered

In every single one of these documents, the basic assumption about the public use of all forest roads and trails is "open to everyone." We have no indication, either at the Forest level, Region-wide, or nationally, that non-system routes created by repeated use of a way or path, in areas presently open to cross-country travel by motor vehicles, is in any way "unauthorized." Rather, it is presented as the existing, lawful condition. Even when the LRMP describes Wilderness restrictions, the word "unauthorized" never appears.

5. C. No Prior Decision to Change Default Designation

The point of these examples is to illustrate the fact that there is no prior or underlying agreement or decision that a road or trail is by "default" not designated for motorized use. The normal designation for every route in every Forest was and still is -- it is open to everyone. The Forest Service must take a separate, discrete action to "un-designate" a route in order to stop motorized use. In recent years the Forest Service has created many lawful ways to do this, but that does not change the historical and legal facts illustrated by our examples.

Unlawful Change of Route Designations

In 2009, however, the Forest Service appears to have dispensed with lawful methods for changing the designation of a road or trail; in this 459 page document, the fully spelled-out word "unauthorized" is used to describe non-system roads and trails over 450 times!

This may seem like a small distinction, perhaps just a simple linguistics issue. It is most definitely not. This DEIS is not analyzing routes unauthorized for motorized use. There is a class of route that has been designated non-motorized or removed from the motorized road/trail inventory (the Wilderness), and where the LRMP has restricted motor vehicle use to designated roads and spurs (within developed recreation sites), and designated certain (unidentified) trails around developed recreation sites so the vehicle users can access the open Forest.

The roads and trails in this analysis are not in any of those categories. The relentlessly repeated use of the term, "unauthorized for motorized use" changes the nature and intent of this analysis. This change is not subtle. It strongly conveys the clear statement that the analysis is examining the effects of illegal activities.

This change in terms, from "unclassified" to "unauthorized," is the essence of arbitrary and capricious.

5. D. Orwellian Transformation

In genuinely Orwellian fashion, a presently lawful activity is transformed into an unlawful activity. The Forest Service is changing the name of one element in the Forest landscape for the sole purpose of enhancing the Forest Service's ability to change that element's legal status. This is a stunning disregard for the rule of law.

Now, with the activity called out as illegal, it matters not whether there are any negative effects on the environment.

Changing the name of all the existing, lawful routes from "unclassified" to "unauthorized" enables the Forest Service to separate the Decision from the analysis.

In other words, every resource specialist may conclude that the roads and trails have no negative effect, but the Forest Service has, via this Orwellian transformation, given itself the authority to close the roads and trails anyway.

Why do we call it Orwellian? Because the activity is called out as illegal every single time the routes under analysis appear in this document.

Determination to Use Awkward Phrase

The Forest Service always uses acronyms for all of its awkwardly-named programs and teams and record-keeping system--but the PNF never uses an acronym for the awkward phrase "unauthorized for motorized use." The PNF spells those words out every single time the roads and trails under analysis are called out in the document. Even when the words don't fit, as in every table, every map, and every chart.

Orwellian Defined

What is the definition of "Orwellian?" The term derives from the name of George Orwell, pen name of Eric Blair, educated at Eton and in 1938 after his participation Spanish Civil War, Orwell expressed disillusion with Communist Party deceit and intellectual dishonesty. After that point, Orwell declared that all of his writings were directed against totalitarianism in all forms, and this commitment is manifested in his two most famous novels, Animal Farm and 1984.

1984 was intended, and has since been recognized, as a satirical reminder of what could happen. It was intended as a warning. The terms "Big Brother" and "The Plot" derive from Orwell's 1984. The novel satirized the deceit of a fictional government whose principle tactic was to change the nature of a thing—any thing—by giving it a different name, and relentlessly using the new name, until it achieved general acceptance as the reality.

Under the color of the NEPA, the PNF has attempted to do exactly this.

5. E. Illegal Modification of Authorized Activities

Language is important, and what we call things is important. To call an activity that has been legal for 100 years suddenly "not authorized," is the essence of "Orwellian." It is the essence of Orwell's 1984.
Is it illegal for the government, via the agency of the Forest Service, to do this? We contend it is. The relentless use of the term "unauthorized" throughout this analysis regardless of actual lawfulness, does in fact go to the intent and purpose of this DEIS. The Forest Service very clearly wants the reviewers of this document to believe that that motor vehicle use is almost universally "not authorized" on the Plumas National Forest.

5. F. Resolution

To resolve this comment:

Please call the roads and trails in this DEIS by their proper name, according to all national and historical terms: unclassified, un-inventoried, or non-system. This will require hundreds of revisions. Then we can begin an ethical and lawful analysis.

Comment 37

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

6. NFMA

6. A. Misrepresentation of Regulations

We [California Off Road Vehicles Association] would like to call your attention to an error in the description of the guiding authorities for this DEIS. Please refer to page 37; The first law listed is the NFMA of 1976:

3.2.2 Analysis Framework: Statute, Regulation, Forest Plan, and Other Direction

National Forest Management Act (NFMA) of 1976. Specifically for Off-Highway Vehicle management, NFMA requires

that this use be planned and implemented to protect land and other resources, promote public safety, and minimize conflicts with other uses of the NFS lands. NFMA also requires that a broad spectrum of forest and rangeland-related outdoor recreation opportunities be provided that respond to current and anticipated user demands.

This is incorrect. The NFMA has no instructions regarding recreation or OHV use. The NFMA is aimed at managing timber harvest such that all resources, including recreation, are given due consideration.

Actual Objectives of NFMA
The objectives of the law are clearly stated:

Findings - The Congress finds that -
"(1) the management of the Nation's renewable resources is highly complex and the uses, demand for, and supply of the various resources are subject to change over time;
"(2) The public interest is served by the Forest Service, Department of Agriculture, in cooperation with other agencies, assessing the Nation's renewable resources, and developing and preparing a national renewable resource and program, which is periodically reviewed and updated;
"(3) to serve the national interest, the renewable resource program must be based on a comprehensive assessment of present and anticipated uses, demand for, and supply of renewable resources from the National Forest Management Act of 1976.

Headings of NFMA subparts:
http://www.fs.fed.us/emc/nfma/includes/NFMA1976.pdf

Select NFMA Subpart Descriptions

Section 8, Transportation System,

Describes the disposition of roads associated with future timber harvest. We should not have to tell the DEIS writers that this means it was never the intent of Congress for this Act to provide the authority to open, close, or otherwise designate the uses of the existing road and trail system on the Plumas N.F.

Section 6, National Forest System Resource Planning,

Mentions recreation only to accommodate the stated objectives of the Act, which is to conduct timber harvest and reforestation projects such that the "interrelatedness of all resources is considered." as quoted below:

"(2) Exceptions to these standards for the harvest of particular species of trees in management units after consideration has been given to the multiple uses of the forest including, but not limited to, recreation, wildlife habitat, and range and after completion of public participation processes utilizing the procedures of subsection (d) of this section." (16 U.S.C. 1604)

6. B. NFMA Does Not Address OHV Use

The NFMA does not by any stretch require that OHV use be planned and implemented to protect land and other resources, promote public safety, and minimize conflicts with other uses of the NFS lands.

The Plumas DEIS' interpretation of the NFMA has distorted the authority far past its application to this route designation process. Including disregard of Section 6:

"(d) The Secretary shall provide for public participation in the development, review, and revision of land management plans including, but not limited to, making the plans or revisions available to the public at convenient locations in the vicinity of the affected unit for a period of at least three months before final adoption, during which period the Secretary shall publicize and hold public meetings or comparable processes at locations that foster public participation in the review of such plans or revisions.

A close review of the statutory authorities cited in the DEIS on page 6, Section 1.5, reveals that every law cited reflects the same misrepresentation. The specific demand by the Forest Service for all motor vehicles to use only the exact routes designated is not stated or implied in any of these laws. Only the general authority to manage activities on NFS lands has been delegated by Congress to the Forest Service.

6. C. Limits of Authority

The Forest Service is perilously close to the limits of its authority by creating and implementing the TMR without a national EIS and without any Congressional mandate or approval. Citing the NFMA, or the Organic Act, or the FLPMA17, and so forth18 as the statutory authorities to implement the TMR is misleading and untruthful. These laws give authority to the Forest Service for specific management areas, such as timber management, water rights and delivery, transportation, land management planning for resource allocation, and so forth (please refer to page 6. Reading the text of the laws that the DEIS cites will confirm our position).

There is no statutory authority to create an MVUM,19 nor is there statutory authority to create a "designated" motor vehicle route system and impose criminal penalties upon any person who fails to operate a motor vehicle in compliance. The legal question to be addressed is, do any of these laws extend to controlling individual activity on NFS lands to the extent and detail that the TMR demands? At such great cost? We contend that none of these laws do so.

6. D. Resolution

Changes to the EIS that will resolve our comment:

We want the Forest Service to state the facts of the matter in section 1.5 of the DEIS; and avoid creating an

argument where there needs to be no argument. Therefore, we want the FEIS to be revised as follows:
1.State clearly in the FEIS that the NFMA is not the statutory authority for regulating "OHV" activity.
2. State clearly in the FEIS that none of the cited laws provide statutory authority for controlling individual activity on NFS lands at the detailed level that the TMR demands.
3. State the origin of the authority for the TMR: it is a product of the administrative rulemaking process, absent a national EIS to determine its effects, and the TMR is not an obvious or logical outcome of the authority assigned to the Forest Service by Congress.
4. We would accept the phrase,

"The TMR may not seem to be an obvious or logical outcome of the authority delegated by Congress to the Forest Service."

Thank you for your attention to this matter.

Comment 38

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

7. Concealing Visitor Numbers

We [California Off Road Vehicles Association] would like to point out several very serious omissions in the DEIS, which unfortunately call into question the accuracy of the entire analysis.

7. A. Referenced Text

DEIS (mis)Interpretation of NVUM

Please refer to page 40, where the DEIS references the Plumas National Forest National Visitor Use Monitoring (NVUM) survey.

3.2.4.1

The survey was designed to assess existing recreation demand on the Forest by asking visitors what they did during their visit, and visitors could check multiple activities.

The DEIS then explains that the survey shows that visitors participated in more than one activity when in the Forest. It goes on to describe the terms "main activity" and "activities participated in." No other details about the purpose of the NVUM are provided.

Actual NVUM Text
Here is what the NVUM actually said. On page 1 of the NVUM:

Scope and purpose of the National Visitor Use Monitoring program.

The National Visitor Use Monitoring (NVUM) program provides reliable information about recreation visitors to national forest system managed lands at the national, regional, and forest level. Information about the quantity and quality of recreation visits is required for national forest plans, Executive Order 12862 (Setting Customer Service Standards), and implementation of the National Recreation Agenda. To improve public service, the agency's Strategic and Annual Performance Plans require measuring trends in user satisfaction and use levels. NVUM information assists Congress, Forest Service leaders, and program managers in making sound decisions that best serve the public and protect valuable natural resources by providing science based, reliable information about the type, quantity, quality and location of recreation use on public lands.

The question of demand is addressed at the bottom of page 3 in the NVUM.

Note that the results of the NVUM activity analysis do not identify the types of activities visitors would like to have offered on the national forests. It also does not tell us about displaced forest visitors, those who no longer visit the forest because the activities they desire are not offered. [[sic]]

7. B. DEIS Fabricates NVUM Meaning

But that is not what DEIS writers implied in their description. We will not speculate about the DEIS writers' objectives for claiming the NVUM is a study that assesses recreation demand.

On page 38 the DEIS tells us that the NVUM reports on "the most popular non-motorized activities." This is also a misrepresentation.

Why do we say that? Because looking at the DEIS21 this statement is obviously not true. The NVUM reports on all identifiable recreation activities. We find the NVUM reports that 0.1% of visitors came to ride horses; 0.1% of visitors came to do primitive camping; 1.3% came to backpack; 1.6% of Forest visits involved the use of OHV's.

Now we must examine the NVUM more closely since the DEIS writers have shown us twice within the space of two pages that they are not accurately representing the information in the report.

First place to check: Limitations of the Results

...The quality of the visitation estimate is dependent on the sample design development, sampling unit selection, sample size and variability, and survey implementation. First, preliminary work conducted by forests to classify sites consistently according to the type and amount of visitation influences the quality of the estimate.

Page 5 of the NVUM the survey coordinator

Observed that it was hard to hit just the right days and sites to find specialized uses such as hunting and OHV use.

The project coordinator calls out OHV use as hard to count. This is a detail about the survey results that a reasonable person would expect to find in an analysis of OHV use. We will not speculate about the DEIS writers' objectives for omitting such a relevant detail. We will say that it appears to be egregiously disingenuous.

As an aside, a reasonable person might also wonder, what is "OHV?" But that is not the point of this comment.

7. C. Concealment of Number of Visitors

However, this NVUM is apparently the "best available information," so, we assume that the figure "2,000 visits" with OHV as the main activity is extrapolated from the total, as was the figure 10,700 visits with OHV as "another activity participated in."

On the other hand, is it really the best available information? If we check the Project Activity Reports that the Forest must submit to California State Parks OHMVR Division, and the cooperating agency on this DEIS, we find a radically different set of numbers. At page 302 (of 402) of the FY 2006 OHMVR Opportunity Summary (OHV Form D), the number of OHV visitor days reported by the Plumas National Forest is 166,750.

We are quite sure that the PNF will explain this difference away. We are not interested in having it explained.

(See) Table 1. Claimed Visitor User Days for Plumas National Forest

What we are noting is, on-the-record visitor information that was reported to the Forest Service's cooperating agency in this DEIS, and directly related to route designation, was omitted from the analysis. This is beyond disingenuous. It looks a bit more like intentional concealment.

7. D. Consideration of Omissions

This omission could be construed many ways.
- Failure to disclose legally binding and readily-available information available about OHV visitation.
- Failure to use, or even consider, the cooperating agency's standards and guidelines. The PNF has been reporting visitor numbers to the OHMVR for many years. This places the fact that the OHMVR has been a Forest Service partner for many years beyond any doubt.
- CEQ standards are quite specific about cooperating agencies in the preparation of EIS's.
- Or, we could point a finger at the way the PNF set up its NVUM survey sites: why, exactly, would it be so hard to find people who came to the Forest to ride their trail bikes?
- How is it that "OHV" seems to be such a fungible term? Are they talking about trail bikes? ATV's? Rock Crawlers? Pickup trucks? The DEIS never discloses.
- Perhaps the survey sites were misplaced?
- The PNF provided the cooperating agency with a visitor number that is 80 times larger than the 2,000 estimated by the PNF NVUM. Giving the Forest Service the benefit of the doubt, we could say the PNF report to the cooperating agency was 15 times higher than the DEIS claims, if we use the category of visitors whose visit "involved the use of OHV's" (not the "main activity").

Mileage Reports

The cooperating agency (California OHMVR) asks for total miles open for OHV use on an annual basis. The report distinguishes between motorcycles, ATV's and 4WD, however, the PNF response for FY 2006 reports the exact same mileage for each. Yet the PNF DEIS purports to analyze and allocate routes for three different types of vehicles. If the ID Team did not know the difference before, it would certainly be obligated to find out, in order to appropriately designate the different types of routes.

Disabled Visits

The NVUM also tells us that 12.2% of visitors had a disability. Yet OHV-related use was only 1.6%.

(See) Table 32. Accessibility of Plumas National Forest Facilities by Persons with Disabilities (NVUM FY2005 data)

Do we have to tell the Forest Service that there is a very strong correlation between OHV users and people who have a disability? Do we have to point out that we consider this yet another substantial omission?

7. E. Credibility is Blown with Obviously False Data

It must be obvious by now, that these omissions call into question the credibility of the entire DEIS. CORVA, as a responsible cooperator and participant in the process, wants the Plumas National Forest to produce a thorough, complete, and accurate analysis. Failing to report all the relevant data about visitor activities is worse than a substantial omission. The PNF is concealing "best available information."

Would the disclosure of the omitted information change the outcome? By itself, it may not. Why? Because

recreation allocation in the National Forest is not a "majority rules" undertaking. Tiny numbers of people engage in a diversity of activities.

Nonetheless, we will take pains to point out that if only 2,000 people ride motorcycles on the trails each year, and there are 5,282 miles of recreational trails, it is impossible to claim any measurable effects at all. In fact, the effects would not even be noticed. Why? Because:

If everybody showed up on the same day to ride, we would have only 3/10ths of one rider per mile of available route. That's impossible of course, so we must extrapolate: based on the six-month season; with riding occurring mostly on weekends, calculates to 48 riding days per year....2,000 riders divided by 48 days is 41 riders per weekend per year, spread out over 5,282 miles of routes. So on any given weekend, we have .0077 riders per mile of available route. Impossible again, so, collect the .0077 into the next whole number...1,000 times .007 would result in one whole person. Is it necessary to continue this to the bitter end to prove our point? Which is…

The Forest Service has inserted obviously false information into the DEIS.

This particular false information affects every resource report in the entire DEIS.
Fraudulent Statements to OHMVR

We refer you, the Deciding Officer, and the comment review team, to 5 CFR Chapter XVI Subpart A, 2635.902(v) "The prohibition against fraud or false statements in a government matter."

To continue, the above assumes that the PNF is reporting all of the open mileage of trail, including the approximately 800 miles of unclassified (unauthorized) trail disregarded by this analysis. We suspect that the PNF does indeed report to the state OHMVR division that this "unauthorized" trail mileage is in fact "authorized."

Apparently the Forest Service's cooperating agency, the State of California OHMVR Division, is not aware that these 1,109 miles of routes that already exist in an "Open" Forest, and are reported as available opportunity, are unauthorized for motor vehicle use.

The disregard of the vast majority of the existing mileage in the Open Forest in this analysis will cause the loss of that mileage. The acreage of Open Forest will drop to zero.

Suffice it to say that it appears that the Forest Service intends to take its partner agency and the fee-paying OHV public, "to the cleaners."

We challenge any objective reviewer to determine from the published data, how many miles of motorized routes of which type, qualify as the OHV "problem" described in the Purpose and Need statement for this DEIS.

Concealment of Relevant Data results in Fatally Incomplete and Unethical DEIS

We contend that the concealment of relevant visitor-use data, and the DEIS's disregard for ~800 miles of routes directly associated with the concealed visitor-use data, causes the analysis to be fatally incomplete and fatally unethical.

We will also contend that this incident of concealing relevant data is so serious that the DEIS must be withdrawn as an instrument to comply with the TMR and as an instrument to change the authority of the Plumas National Forest. It is, on its face, unlawful.

7. F. Resolution

To correct this, the PNF will have to prepare new EIS which does disclose all key data, and revises the outcomes accordingly.

Thank you in advance for your commitment to accurate and ethical NEPA documents.

Comment 39

Action: Adequacy of Studies (Best Available Science)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Coppoletta, M. 2008. Biological Evaluation, p. B-1

8. Weed Lie

8. A. Accuracy and Scientific Integrity Issues

We [California Off Road Vehicles Association] would like to call your attention to a pattern of omissions and misrepresentations in the DEIS which call into question the accuracy and scientific integrity of the entire analysis.

Trail Designation is not Ground Disturbing
The following assumptions, found in the DEIS on page 335, were used in the analysis of noxious weeds in addition to those listed at the beginning of Chapter 3.

3.9.3.3 Assumptions Specific to Noxious Weed Assessment.

1. This project is assumed to be a ground-disturbing activity, which requires a weed risk assessment.

No statement follows describing the specific Forest Service standard, or "trigger," which makes such an assessment necessary.

We are fully aware that the Forest Service has specific standards that trigger such assessments. The purpose of the standard is to prevent individual employees from representing as Forest Service legal obligations what is actually the individual employee's personal standard, and to prevent disparate treatment of lawful activities if Forest-level or Regional disapproval for a specific activity is out of compliance with national direction.

This appears to be the case for the noxious weeds "risk assessment."

FSM Standard in 2081.03

Why do we say that? Because the DEIS does not disclose the specific standards that trigger the assumption on page 335. The DEIS only says, "FSM 2081.03."

Here is the standard: FSM 2081.03

Policy. When any ground disturbing action or activity is proposed, determine the risk of introducing or spreading noxious weeds associated with the proposed action.

1. For projects having moderate to high risk of introducing or spreading noxious weeds, the project decision document must identify noxious weed control measures that must be undertaken during project implementation.

2. Make every effort to ensure that all seed, feed, hay, and straw used on National Forest System lands are free of noxious weed seeds. (FSH 6309.12, sec. 42 and 42.1).

3. Where States have enacted legislation and have an active program to make weed-free forage available, Forest Officers shall issue orders restricting the transport of feed, hay, straw, or mulch which is not declared as weed-free, as provided in 36 CFR 261.50(a) and 261.58(t).

4. Use contract and permit clauses to prevent the introduction or spread of noxious weeds by contractors and permittees. For example, where determined to be appropriate, use clauses requiring contractors or permittees to clean their equipment prior to entering National Forest System lands."

The Manual provides no definition of 'ground-disturbing' because the phrase 'ground-disturbing' is a self-evident description. The FSM standard does not say that the designation of existing trails is a ground disturbing activity. The FSM does not say that designating existing trails is a moderate to high risk.

In this DEIS, every trail and road already exists. Yet, the Forest Service insists on presenting it as ground-disturbing. From page 335:

3.9.3.2 Field Surveys.

To date, field surveys have been conducted on approximately 287 miles of proposed trails (Vollmar 2007, USDA Forest Service 2007, USDA Forest Service 2008 a, b and c). An additional 66 miles of proposed trail and 10 miles of existing system trails...

This is a stunning case of linguistic deception; the Forest Service calls the "system" trails existing, and calls the existing unclassified, trails "proposed;" when in fact the "proposed" trails already exist, exactly the same as the system trails.

Gosh, now it sounds like there is a ground disturbing activity. If the weed section of this DEIS were to be separated from the rest of the document, for example--cited out of context, a reviewer would never know that the "proposed" trails are already there, and no ground will be disturbed.

The trails have been in place for years, many of them for decades.

Failure to Show Risk

The Forest Service declines to provide an explanation of how closing 78 percent of the existing unclassified trail mileage is a high risk proposal, or even a moderate risk proposal.

The omission of this explanation conceals the negative cumulative effects-- Every one of the action alternatives will dramatically increase traffic on the remaining trails. Why do we say this increases the risk? Because the DEIS tells us it will on page 335:

"A high risk of spread or introduction was assigned based on the presence of infestations of a route or proposed trail that was heavily used,..."

Failure to Look at Existing System

Furthermore, the Forest Service has not even looked at all of these "proposed" existing trails. We are certain that the Forest Service will claim that it does not have the resources to do so. We contend that the Forest Service should have thought of that when it created for itself the authority set forth in the TMR.

8. B. Unknown vs. Worst Case Scenarios

The Forest Service presents no evidence or explanation that the assumption on page 335 is appropriate, or even lawful:

"High Risk: A high risk of spread or introduction was assigned [[..where...]] unauthorized route inventories were [[....]] incomplete. A high risk of spread was assumed when there was no information on weed populations."

Unknown means, unknown. "Unknown" does not equal "worst case" in any scientific analysis. CEQ allows for unknowns and gaps in knowledge. In this allowance, the agency is not given the option of assuming the worst just because it does not have all the information:

[Section] 1502.22 Incomplete or unavailable information.

When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking.

(b)..... the agency shall include within the environmental impact statement:

1) A statement that such information is incomplete or unavailable; (2) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment; (3) a summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment, and (4) the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, "reasonably foreseeable" includes impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.

In other words, CEQ expects the Forest Service to provide substantial evidence that assuming the highest risk simply because there was no information, is not purely conjectural. Yet the Forest Service does not even acknowledge this requirement.

Of course it is impossible for the Forest Service to use factual evidence to support the claims that weed spread will increase where ever the Forest Service has no information about a trail. Why? Because the DEIS provides no factual information about the known rate of spread, i.e. the date first recorded, how many acres had weeds in 2005, or 2000, or 1998, such that a reviewer or a professional may determine the rate of spread. It is not possible to provide an informed estimate on the rate of spread in unknown areas when the agency has no information on the rate of spread in the known areas.

On page 338, it confirms 700 acres as the actual affected acreage. So, the percentage of the land base affected is really just .07 percent (.07%), or seven one-hundredths percent, of the 997,000 acres.

Nowhere in the DEIS or in the research cited do we learn that weeds will metastasize and destroy the entire forest. What we do learn from the DEIS and the supporting research is that grazing, Forest Service and California Dept. of Forestry "preventative" fire-lines from the 1950's through the 1980's, and wildfires, are the worst vectors for the introduction and spread of weeds.

Scale of Problem

The Trombulak and Frissell work cited (DEIS p334) is a synthesis of the effects of paved, ditched, culverted, and heavily traveled roads. It has only one short section on weeds, and this is as follows: Trombulak and Frissell, 2000:

Some exotic plants establish themselves preferentially along roadsides and in other disturbed habitats.

Tromulak and Frissell do not confirm that roadside weeds spread to the interior of the forest. They only spread to other, similar disturbed sites, because conditions do not support the weed.

That is why the present infested area covers just seven ten-thousandths of one percent (.07%) of the PNF land base.

Yet the Forest Service declines to disclose the scale of the problem. 700 acres sounds like a lot. Seven one-hundredths-of-one single percent, sounds substantially different.

Narrative Suggests Opposite what Scientist Suggests

The Forest Service narrative causes reviewers to perceive that weeds alongside the road will inevitably take over unroaded sites. (p335)

3.9.3.1 Geographic Area Evaluated for Impacts on Noxious Weeds

- Direct and indirect effects from noxious weeds under the four action alternatives were assessed using the area within 100 feet of proposed trails. In general, weed infestations located in close proximity to the proposed trails (i.e. within 100 feet) will have a high risk of spread to areas along the trail and to other parts of the Forest.

From Trombulak and Frissell, 2000:

"Some exotic plants establish themselves preferentially along roadsides and in other disturbed habitats."

Why do we use only one quotation from the Trombulak and Frissell research? Because that is all they have to say

about weeds and roads. If we follow one of the research cites in the Trombulak article, at B. Greenburg, the results are the same. Weeds transported by vehicles into National Parks via roads establish themselves in the "verge" which is the part of the roadside that leaves the maximum amount of disturbed soils regardless of whether the road is paved or a maintained native-surface road. These weeds do not inevitably move into the rest of the natural landscape because the natural landscape conditions will not support the weeds.

List of Omissions

It is the omissions at issue here.

1. The Forest Service omits the word "existing" from the unclassified trail descriptions.
2. The Forest Service omits the explanation for how designation of existing trails becomes a high risk proposal, or even a moderate risk proposal.
3. All comparative "rate-of-spread" data is omitted.
4. The proportion of the total land base affected is omitted (the scale of the problem).
5. The explanation for how simple designation becomes a high risk proposal, or even a moderate risk proposal, is omitted.
6. The explanation for how closing 78 percent of the existing unclassified trails are a ground-disturbing proposal, or a high or even a moderate risk proposal, is omitted.
7. The fact that weeds that establish themselves in the disturbed road "verge" do not spread to other types of sites is omitted.
8. The CEQ regulation for the disclosure and treatment of unknowns is not only omitted, it is completely disregarded.
9. The fact that Trombulak and Frissell do not include trails in their synthesis is omitted.
10. The portions of the research reports revealing that the absence of maintenance by heavy equipment eliminates this disturbed roadside verge in which the weeds can take hold, is omitted (Greenberg, from Trombulak and Frissell).
11. The physical difference between a "system" road or trail and a "non-system" road or trail is omitted.
12. The cumulative effects of the preferred alternative are not fully disclosed.

Anomaly between Unauthorized Routes and System Routes

Omission #11 is especially pertinent, because Table 142, reveals a ridiculously lopsided dataset. For reasons left unexplained by this analysis, the "unauthorized" routes have more than ten times the rate of infestation than the "system" routes.

Yet, the only distinction between the two types of existing routes is administrative.

Figure 1. Plumas National Forest Public Motorized Travel Management DEIS (p340)

This sort of lopsided result is suspicious in a scientific analysis. A professional field researcher would call this an outlier, or an anomaly, and standard scientific protocols require that the anomaly be investigated and explained as fully as possible. Yet the DEIS has no such investigation or explanation. In fact, the DEIS will not even admit to not knowing why this is so. This silence raises more suspicions than it settles.

If we had time we would conduct an in-depth analysis ourselves, and provide the answer that the Forest Service is so reluctant to reveal. However, because five DEIS's for the Sierra Forests have been released between October 31 2008 and February 28, 2009, we cannot possibly uncover these answers.

Random Example

We can try one random selection of weed infestations near what appears to be a dead end "unauthorized" trail. When we look at only the lines, with no topographic features or landmarks, it does indeed appear that the "unauthorized" trail has an excess of weed infestation (Figure 2). However, when we add the USGS background, we see that the trail originates at the railroad right-of-way on the Forest boundary at Quincy Junction, and that the infestation lies between the railroad, Quincy Junction, and Mount Hough Highway (Figure 3).

Of the five infestations that appear to be within 100 feet of the "unauthorized" trail, three are also within 100 feet of either the railroad, the highway, or Quincy Junction. Thus, the trail cannot be assumed to be the vector.

Missing Forest Service Analysis

This causes the Forest Service silence on the anomaly shown by Table 142 to be highly suspect. In fact, this calls into question Table 142 in its entirety. It appears that no other vectors that are also within 100 feet of the "unauthorized" trail were considered, nor was a trail surrounded by other obvious and far more acute vectors, removed or even adjusted, to determine the causative elements of the infestation.

Our truncated investigation into this strange data table reveals that the GIS data layer for weeds has a "null" entry in the fields where the plant status and distance to water should be entered. It has a "date first collected" and a "most recent date collected," yet the two dates are the same for every single entry! In other words, there is no baseline data for this assessment. In terms of scientific integrity, the assessment is void. We could begin an assessment with this data, but we cannot assess the future risk with this data, because we do not have any information about the rate of spread of these plants. We only know they are currently present at these sites.

Weed Assessment is Useless Bulk

In the very limited time allotted for review of this DEIS, we will supply many statements from the DEIS which clearly state, repeatedly, that these routes already exist. No new construction is proposed. We are fully aware that the maintenance and repair of existing routes does not require a risk assessment for the spread of noxious weeds.

For example:

The addition of unauthorized routes to the NFTS would not increase the percentage of land disturbed because these routes already exist on the landscape.

... As stated above, the vast majority of soil and water resource effects of the unauthorized routes and areas that are proposed for addition to the NFTS have already occurred since these routes currently exist on the landscape.

The entire set of existing, unauthorized routes described in the No-action alternative (totaling approximately 1,109 miles) was not surveyed for existing condition because actions are not proposed for all of these routes.

Long-term (25-30 year) benefits to soil and water resources would occur under Alternative 4 because motorized traffic would be prohibited on 969 miles of inventoried existing, unauthorized routes that are currently open to motorized traffic.

Aside from the dishonesty of the page 335 assumption, a brief reading of Title 40, part 1500 through 1508 tells us that in this case, a weed risk assessment qualifies as "useless bulk," and the "accumulation of extraneous data," and a failure to "emphasize the relevant issues."

The implications of the omissions and misrepresentations concern us far more than the CEQ violations. If this obviously false assumption was so easy to find, what else would we find if we had the time and resources?

This certainly explains the Forest Service refusal to allow the full 90 days as set forth in the NFMA for public review of land management plans and amendments. This certainly explains why the Forest Service is releasing multiple Region 5 DEIS's almost simultaneously. The Forest Service clearly does not want the public to scrutinize this analysis too closely.

8. C. Resolution

While we realize that the Forest Service has a legal obligation and a number of agreements which require attention to invasive plants, this does not qualify as a subject requiring nine full pages and thirteen different tables in this EIS (at least not according to the CEQ regulations).

Thus, what would resolve this concern:

1. We want the DEIS to clearly state that according to FSM 2081.03,
"This DEIS is evaluating a low-risk proposal, because all of the trails already exist. No ground disturbing actions are proposed."
2. We want the disclosure and treatment of what is not known to be done in accordance with CEQ regulations. In other words, we want the Forest Service to delete the assumption that unknowns are assumed to be high risk.
3. We want the DEIS to revise the "Cumulative Impacts" section for noxious weeds to include the following:
"There may be slight differences estimated between the action alternatives. However, the most easily predicted cumulative impact (based on this assessment and the research) will be as follows: "The preferred alternative reduces the trail mileage by 78 percent. The increased amount of traffic on the remaining trails will be significant. This causes the proposed action to be a very high-risk endeavor, even though no ground disturbance is proposed."
4. We want the "Noxious Weed Assessment" to be revised and edited accordingly.
5. In the revised assessment, the scale of the problem must be accurately represented.
6. In the revised assessment, the fact that the Forest Service has no baseline for the assessment must be disclosed.
7. Remove Table 142 from the analysis.

Does this sound irrational? Yes, it does.

The Forest Service can straighten out the contradictions by including the omitted information, following the CEQ regulations, and correctly representing the research it cites. Then, based on this full disclosure and full CEQ compliance, the Forest Service will find that a rational connection between the proposal and the cumulative effects is quite obvious.

Thank you in advance for your interest in accurate ethical environmental analyses.

Response

FS is rationally and reasonably interpreting "ground disturbing activity" to include OHV activity (riding quads and motorcycles disturbs ground). The DEIS discloses (p. 13) other ground disturbing actions to be used as mitigations. The assumption is disclosed on p. 335 of the DEIS. Page 334 of the DEIS and Page B-1 of the BE present the specific direction that makes the assessment necessary.

The FS does not claim that closing trails is a high risk proposal or even a moderate risk proposal. The risk is in the activity (OHV use) that the designation authorizes, not in closing trails.
The intent is to err on the side of caution to prevent the spread of a very serious threat to public lands. Inventories are lacking on 25 miles of unauthorized trails.

The DEIS discloses on p. 335 that 25 miles of proposed trails have not been surveyed.

See the Appendix B of the BE for :Habitat vulnerability, types of impacts and increased vectors (including citations) as a result of route designation.

FS does not include CEQ regulations in the DEIS. The requirement of § 1502.22 Incomplete or unavailable information, is met in the Noxious Weed Risk Assessment as shown above.
Preventing mechanical disturbance in known weed sites is generally accepted practice in the scientific community. It is within the rule of reason to assume that OHV activity commonly spreads weeds.

Comment 40

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

9. Alternative 2, Table 3

We [California Off Road Vehicles Association] would like to point out to you that there are four serious violations of the CEQ regulations directing the conduct of an environmental Impact Statement. The violations are so egregious it is hard to perceive them as honest mistakes.

9. A. DEIS Lacks Analysis

1) The single most important element of the Decision will be based on information that is not disclosed in this analysis and was never subjected to public review.
2) The DEIS did not use the information from the Affected Environment or the Environmental Consequences to formulate the Alternatives. Omitting this information has fatally constrained the range of alternatives.
3) We found no evidence that the Forest Service analyzed any trails. The Soils and Hydrology Report for this DEIS does identify trails, and the narrative description of the no-action alternative describes three classes of routes. Yet when we examine the resource specialist analyses in the DEIS itself, the statement that "all routes are considered equal" and/or "all vehicles are considered equal" is repeated in every report. The known differences, and the Forest Service investment in the site-by-site surveys, were discarded. The information was not used in the analysis.

Data Not Used

The comparative tables in Chapter Two of the DEIS pp. 1-29, are not based on the information presented in the Affected Environment and Environmental Consequences, DEIS Chapter 3.

The Tables and discussion of Alternatives in Chapter 2, omit the Chapter 3 data regarding the 742 miles of existing routes that are presently open and lawfully in-use by the public. This is not only an explicit disregard for the CEQ 1502.14 requirement. It also dramatically changes the options available for the Deciding Officer.

When all of the data from Chapter 3--specifically the mileage deleted prior to the analysis is used, in Chapter 2, it produces a stunning change in the outcomes for every alternative.

Here is what we mean when we say all of the data was not used; The Tables in Chapter 2, comparing the differences between the alternatives, all lack one extremely important row: "Miles of Existing Roads and Trails that will be Closed." Why is this important? Because without it, we cannot tell what the magnitude of change will be from the baseline condition.

For example on page 28, Table 3 shows all zeros in the Alternative 1 column and the Alternative 3 column. As it is presented in Table 3, the no-action alternative is at the same end of the 'how much to designate scale' as Alternative 3.

(See) Table 3. Summary Comparison of Alternatives [from DEIS]

We have what appears to be an intentional evasion of the CEQ requirement, that the data from Chapter 3 and 4 be used in the alternatives, considering the Forest Service discarded the alternative at the opposite end of the "how much to designate" scale, which would have analyzed designating all existing routes & trails.

Why intentional? Because we know the Forest Service has the data. We know the Forest Service expended a substantial amount of government resources to gather that data. Yet the Forest Service has omitted it from the most important part of the DEIS.

What a lawful Summary of Alternatives would look like: Fix Alt 6 Explain
(See) [Table 3.] Summary of Comparison Between Alternatives

The DEIS does not reveal in any chapter that the Forest Service is proposing a truly radical change from the present environment. Comparing these two tables clarifies that the real proposal is not shown in Chapter 2. In other words, the Alternatives as they are now constructed, conceal the real proposal.

What is the real proposal?

The real proposal is the closure of 858 miles of the existing 1,109 miles of road and trail that is presently open and in-use for lawful Forest access by the public.

When added to the fact that the Forest Service discarded the alternative at the opposite end of the "how much to designate" scale, which is to analyze designating all existing routes, trails, we have what appears to be an intentional evasion of the CEQ requirement that the data from chapter 3 and 4 be used in the alternatives. Why intentional? Because we know the Forest Service has the data. We know the Forest Service expended a substantial amount of government resources to gather that data. Yet the Forest Service has omitted it from the most important part of the DEIS.

If the real proposal were to be revealed, a reasonable person would wonder whether the proposed action is in balance with the loss of benefits presently enjoyed by the public (the existing situation).

9. B. DEIS Doesn't Allow for Lawful Comment

If the Forest Service had used the data from Chapter 3 Affected Environment and Environmental Consequences section in Chapter 2, as specifically required at 40 CFR 1502.14, we would know what the Forest Service really intends to change; and we would have a lawful opportunity to comment on what the Forest Service plans to change. In this DEIS, that is not possible.

The Forest Service describes "internal discussions" (p.2) as part of the process used for evaluating existing trails and roads. "Internal discussions" do not meet the CEQ standard for information and data that used in an EIS. Internal discussions are by their nature, not reviewable by the public. Internal discussions represent the essence of arbitrary and capricious.

Aside from the "internal discussions," the Forest Service is silent on how it happened that 367 miles were selected for consideration, and 742 miles were not selected for consideration.

No Lawful Description of Decision Making Process

In fact, the Forest Service appears to have no lawful explanation for "not considering" 742 miles of existing roads and trails in this analysis. The Forest Service claims the authority to use prior Decisions---yet does not reveal any of those prior Decisions. Reviewers have with no way to determine the quality, legality, or accuracy of those prior decisions.
Reviewers have with no way to tell whether the decisions were applied consistently. This means that, essentially, no one knows if what the Forest Service actually intends to change is even legal---until after the ROD.

9. C. Requirement to Litigate for Disclosure

Thus, the ROD will be formulated using undisclosed information as a key element. The Forest Service is forcing any party not in accordance with the proposed action to litigate for full disclosure.

9. D. Resolution

This is a serious and fundamental flaw in the structure of this DEIS. Therefore, we have no feasible suggestions for correcting the problem such that this DEIS could get to Decision in a timely way. We request the Forest Service to withdraw this DEIS for consideration as the instrument to change the authority of the PNF, and we want the Forest Service to withdraw this DEIS from consideration for use as the instrument to comply with the Travel Management Rule.

Comment 41

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

10. Soils and Hydrology

10. A. Preable
Pre NEPA Analysis Omission

We [California Off Road Vehicles Association] have identified an omission in the pre-NEPA analysis data that informs this DEIS. The result in a terrible flaw in the analysis, which if not corrected, will be worse than an embarrassment to the Forest Service. It will severely damage the Forest Service reputation for thorough, accurate, and ethical analyses.
This mistake causes the omission of approximately 842 miles from designation, and the "effects" estimates made in the DEIS, to be an error that makes the conclusions in the DEIS wrong, by an order of magnitude.

Roads Analysis Process

At page 33 of the DEIS we find a requirement for a Roads Analysis Process (RAP):

11. Travel analysis is a pre-NEPA planning exercise for transportation planning, which informs travel management. Until new directives are issued, the agency continues to follow existing policy related to transportation planning and analysis. For example, some Roads Analysis Process requirements in FSM 7700 and 7710 are still applicable.

Unfortunately, we do not find the Roads Analysis Process (RAP) available for review in this DEIS.

We can only speculate that the supplementary reports such as the PNF Soil and Water Report, is one of the pre-NEPA planning exercises that statement #11 above intends to use to 'inform' the analysis. Thus, a close examination of the Soil and Water Report is an appropriate exercise in order to provide informed comment on the DEIS.

Further, we remind the Forest Service that the Roads Analysis Process (RAP) is not a Decision document and cannot be used to eliminate roads and trails from a NEPA-compliant Forest-wide analysis of roads and trails, before the actual analysis begins. The RAP is not an appropriate tool for narrowing the scope of the analysis, because doing so would mean that substantial elements of the subject being analyzed by the NEPA analysis would not even be in the analysis.

Response

The Travel Management Rule is comprised of three parts:Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The identification of the minimum road system needed for administration, utilization and protection of NFS lands is contained in subpart A. There is no legal requirement in the regulations that the agency implement subpart A as a pre-condition to, or part of, the current proposed action.

Comment 42

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. B. Hidden Assumptions

This comment intends to show that the Soil and Water Report does not provide an analysis that is useful for the formulation of Alternatives or the Travel Management decisions.

Route Widths are Omitted

Why do we say that? Because despite the importance of "Route Width" in Travel Management and in soil erosion modeling, the Soil and Water Evaluation Report (SWER) makes no such distinctions.

This flaw is carried forward into the DEIS in frequently repeated variations of the statement "all routes are considered equal in impacts." Even though mileages specific to three different vehicle types, full-sized road, 50-inch-wide ATV trail, and less than 50 inch-wide motorcycle trail, is called out in the DEIS many times – the underlying analysis doesn't make the same distinctions.

The Plumas SWER does not discuss route width. Nevertheless, width is not absent from the analysis. Width exists as a hidden assumption and it has a huge effect on the analysis, and resulting Alternative ratings for erosion effects.

Exposed Area

Erosion from a road or trail is a function of the exposed soil area. As every schoolchild is taught in basic geometry, width and length are necessary to determine area.

Without knowing the width of a road, you cannot calculate the route area; and you most certainly cannot estimate the erosion from the road. However, the SWER discussion and analysis of routes is based exclusively on lengths (miles) and totally omits the differences caused by the width of the routes.

Response

The "Field survey methodology" section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Comment 43

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. C. Water Erosion Prediction Project

The importance of the width variable is demonstrated in a WEPP technical document. WEPP (Water Erosion Prediction Project) is the soil erosion modeling and simulation software tool developed by the USFS Rocky Mountain Research Station.

WEPP Formula

The WEPP erosion formula given below shows the sediment yield is a function of three variables: width, length and slope. Remove any one of those variables, and the sediment yield cannot be calculated.

The effective length…of the flow path over the road surface is:

Effective Length = Road Width (Times) Effective Slope over 4%

In order to maintain the correct total road surface area, an effective width of the element is then calculated as:

Effective Width = Road Length (times) Road Width over Effective Length

WEPP Usage Example

We will illustrate WEPP usage with two relevant examples.
WEPP Example 1

WEPP:Road was used to model erosion in the SMOKY CANYON MINE PANELS F and G EIS; this FEIS reaffirms that road erosion cannot be calculated without surface area. (emphasis added)

Seyedbagheri (1996) reported that road size (width, cut/fill lengths, volume of material) affects both unit erosion rate and transport distance.

For this analysis, the specific inputs to the WEPP: Road module were determined based on the following sources: Chapter 2 road design information (road width, fill slope gradient, surfacing; and road shape/ditch configuration);...

WEPP Example 2: Summary of the Proposed Watershed Protection Program
The El Corte de Madera Creek Open Space Preserve proposes to reduce sediment, improve the watershed, and water quality by reducing the widths of routes.

Narrowing road widths to the minimum necessary for patrol, emergency response, and maintenance activities, thus reducing the overall surface area exposed to the weathering and erosive effects of rainfall….

[[Roads]] proposed for conversion to trail-width will be reduced to approximately 4-foot width to accommodate ATV travel.

The actions taken in the El Corte project emphasize the importance of analyzing route width, especially when seeking to reduce erosion.

The Plumas SWER makes a very serious error when it omits any discussion of widths and surface area, and proceeds to analyze all routes as if they are the same width.

Response

Information regarding the USDA Water Erosion Prediction Project (WEPP) model has been added to section 3.5.3.1. The WEPP component for roads does, indeed, incorporate a direct relationship between the width of a road and the amount of erosion leaving the road prism (i.e., in comparing one road that is twice as wide as another road, the amount of eroded material leaving the wider road prism is predicted to be twice the amount of erosion from the narrower road). However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. WEPP modeling is not part of the analysis methodology for trails proposed by this project because field surveyors focused on observing, for each route proposed, whether route drainage was effectively dispersed, whether erosion occurred, and whether erosion entered stream channels rather than on collecting the extensive fill slope and buffer length and gradient data necessary to run the theoretical WEPP model.

Comment 44

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. D. Threshold of Concern

TOC
The Plumas NF uses a watershed Threshold of Concern(TOC) that is 12% of the surface area in a given watershed. Meaning the TOC is reached when over 12% of the watershed area is disturbed or exposed.

Cumulative Watershed Effects (CWE) from these vegetation projects are closely controlled by assuring that the resulting [[Equivalent Roaded Acres]] model outputs for the project watersheds, when expressed as a percentage of total watershed area, do not exceed the prescribed Threshold of Concern (TOC). Predominately, the TOC for Plumas NF watersheds is prescribed to be 12 percent of the watershed area. Since 1999, none of the PNF vegetation management projects have resulted in an exceedance [[sic]] of the TOC for any of the project watersheds.

The SWER goes on to discuss the Cumulative Watershed Effects standard of 12% in its discussion of road density analysis.

For the two watersheds that were determined to have a high risk of CWE in the 1999 HFQLG EIS, watersheds 110114 and 110159 [[....]], Alternative 2 would produce significant reductions in road / route density, resulting in densities of 4.49 and 3.40 mi / mi2, respectively.

The SWER illustrates a Watershed Cumulative Effect ratio of a prior project that had minimal concern.

For Example, for watershed 110038, the total [[Estimated Roaded Area]] increase due to the Watdog Project would still be 0.8%, a minor increase in relation to the watershed's Threshold of Concern.

Determining Actual Route Surface Area

Relevant Definitions

Table 2 Units of Measurement

Formula for Calculating Surface Area:

(Route Width) (times) (Length) = (Route Surface Area) over Surface Area of Square Mile (times) 100 = (Percentage of Surface Area).

Example Surface Area's
(See) Table 3 Surface Area of Route Types

Note:

A road 20 feet wide and 4 miles long occupies one and a half percent (1.5%) of the surface area of one square mile.

A motorcycle trail 3 ft wide and 4 miles long takes up less than three one-hundredths of one percent of the surface area on a square mile.

Miles of Route to Reach TOC

Threshold of Concern (TOC) Formula
The Threshold of Concern is reached when over 3.3 million square feet are covered in routes, per square mile.

(Square Mile surface area) (times) (12%) = TOC
(27,878,400 sq ft) (times) (12%) = 3,345,408 sq ft.

Formula for Calculating Miles of Routes to reach TOC

It would take a whopping 31.68 miles of 20 ft road within one square mile to expose the soil surface of 12% of one square mile, and 211 miles of Motorcycle Trail to reach the Threshold of Concern.

(Surface Area) (times) (12%) = TOC area (over) (Route Width (times) (Length) = (Route Surface Area) = (TOC in Route Distance)

Miles of Routes to Reach TOC
(See) Table 4 Miles of Route Type to Reach Threshold of Concern

Response

The cumulative effects methodology has been clarified in section 3.5.4. For Forest timber projects, the typical method used to assess cumulative watershed effects is the ERA model. The changes in ERA percentage values presented in Appendix E of the Soil and Water Resource Report, and the assigned threshold of concern for the watershed presented in Table 23, are reported only to describe existing condition. Section 3.5.4 recognizes that the total area of motorized routes in a watershed, and the area of existing unauthorized routes, comprise a small and likely insignificant fraction of the TOC. The effect of greatest concern to watershed condition is not the area disturbed but, rather, the general effect of motorized roads and trails concentrating natural runoff patterns and often channeling runoff to a point that leads to excessive erosion of the route and adjacent landscape. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Comment 45

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. E. Forest Surface Occupied by Unauthorized Routes

The DEIS and the SWER never ask (or answer) what percentage of the surface area is occupied by roads and trails.

So we posed the following questions.
- What is the Actual Percentage of Forest Surface Occupied by Unauthorized Roads and Trails?
- Is Proliferation of Unauthorized Routes a Serious Problem?
- Does the Surface Area Occupied by Trails Approach or Cross the Threshold of Concern?

Formula Inputs

According to the DEIS there are 5,027 miles of existing roads and routes (p84); of those, 1,109 miles are the inventoried unauthorized routes.

The Plumas National Forest has 999,521 acres currently open to cross-country travel by motor vehicles. In 2005, the Plumas National Forest completed an extensive inventory of unauthorized routes on NFS lands open to cross-country travel as described in the MOI. Approximately 1,109 miles of unauthorized routes were identified.

The existing National Forest Transportation System (NFTS) is described at page 6:

The PNF currently manages and maintains approximately 4,137 miles of NFTS roads and 123 miles of NFTS motorized trails.

In the No-action Alternative the DEIS says:

Over 1,109 miles of unauthorized routes would receive continued use. Of these, approximately 725 miles are suitable for all vehicles, 159 miles are 50" or less in width and 225 miles are suitable for motorcycles only. Routes would continue to proliferate.

Calculating Route Density and Proliferation

Putting these pieces together a true picture of the overall situation emerges concerning route density and proliferation of trails and roads over the entire life of the Plumas National Forest.

(See) Table 5 Area Occupied by Unauthorized Routes in Study Area

Assumptions and Facts

Route Proliferation

SWER Assumption: Unauthorized roads and trails cover a significant area and are causing damage to watersheds. Routes are proliferating at a rate that is a threat to the Forest.

Fact: The 'unauthorized' routes cover less than 0.19 percent of the area. That includes the total amount of 'proliferation' that has occurred over the entire life of the Forest ---even though the number of "OHVs" in use has increased many hundreds of percent (DEIS p1).

Fact: Forest Service could designate all 'unauthorized routes' and the net increase in road/route density would be an increase of less than .2 of one percent.

Fact: The percentage of forest surface occupied by roads and trails is so tiny, that if the Forest admitted to it, they could not plausibly argue the routes have any significant impact.

Recommendation: The DEIS should be redrafted with an alternative that would close cross country travel and designate all the unauthorized roads and trails.

Designating Routes Causes Adverse Effects
SWER Assumption: Designating existing roads and trails will increase Cumulative Watershed Effects (CWE).

The entire road density discussion in the SWER is presented as if designating existing routes would add new disturbance and raise the CWE.

All new proposed NFS routes under Alternatives 2 (Proposed Action), 4 and 5 have been field surveyed. These two [[sic]] alternatives include all unauthorized routes that are proposed to be added to the system under any of the action alternatives. The focus of these surveys is to determine the risk for potential soil and water resource effects, due to each individual unauthorized route. The goal of these surveys, and subsequent field visits and discussions, is to make one of four ratings of soil and water impacts for each proposed route:

Fact: Impacts from existing routes are already factored into the CWEs. The Plumas already has assessments of all the watersheds and has given them CWE ratings. Those ratings include whatever effects are generated by the existing routes. Measurements for sediment load and erosion already have the existing roads factored in.

Fact: Designation of existing routes does not add any new impacts. Designating existing routes does not increase the CWEs; it has zero effect because it adds zero impacts.

The addition of unauthorized routes to the NFTS would not increase the percentage of land disturbed because these routes already exist on the landscape.

Additionally, The Plumas' own assessment is that watershed health is

…stable since 1999 and some aspects have improved.

Response

The cumulative effects methodology has been clarified in section 3.5.4. This section recognizes that the total area of motorized routes in a watershed, and the area of existing unauthorized routes, comprise a small and likely insignificant fraction of the TOC. The effect of greatest concern to watershed condition is not the area disturbed but, rather, the general effect of motorized roads and trails concentrating natural runoff patterns and often channeling runoff to a point that leads to excessive erosion of the route and adjacent landscape. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

As described in section 3.5.6.2, for Alternative 2 – and for all action alternatives (2-5) - the cumulative effect to watershed condition at the analysis watershed scale would be beneficial as a result of passive recovery of unauthorized routes currently open to motorized traffic, mitigations performed on routes added to the NFTS, and protection of areas that are currently untracked. The analysis recognizes that the addition of unauthorized routes to the NFTS as trails would not increase the percentage of land disturbed and would not increase adverse effects to soil and water resources over existing levels because these routes already exist on the landscape. Unlike alternatives 3, 4 and 5, the analysis states that adverse soil and water effects would exist at a site-specific scale for alternative 2 because 51 miles of trail proposed are rated “Extreme,” meaning that those adverse effects cannot be feasibly mitigated and would persist in the future.

Comment 46

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. F. Erosion Rating System in DEIS

Section 3.5.3.1 Geographic Scope of the Soil and Water Resource Analysis, which begins by describing a rating system applied to roads and trails is summarized in Table 6 below. This system determines a Potential Maximum Erosion Hazard Rating (EHR) to each ‘unauthorized’ route. At the end of the chapter the DEIS summarizes the expected resource effects (Figure 4). This erosion rating system was used to determine suitability of a route for designation.

(See) Table 6 Summary of Erosion Rating System

Combining Rating Systems

There is nothing in the SWER to show that adding a fraction of a percent of disturbed surface makes any significant increase in the Cumulative Watershed Effects (CWE). Additionally, there is no numeric or quantitative rating given for the CWEs for each watershed. They are rated only as Low, Medium, High see ‘Table 3’ below (Figure 5). (discussed below)

The SWER commits the scientific 'sin' of trying to combine two entirely different rating systems in Table 3. The route density analysis is a number, the CWE rating is not a number. The SWER provides no explanation for how a number can be 'added' to a rating described as Low, Medium and High. 'Risk Rating 'M' plus Road Density of 3.73 equals…what?"

‘Table 3’ Tells us nothing about how road and trail density affects the risk rating
Example:

Select the highest road density shown (top line in above table); conservatively assuming that all the routes for Watershed 110067 are 20 foot wide roads, 6.53 miles of roads per square mile would take up less than 3 % of one mi2.

If the routes in a Watershed were not only roads, but rather a combination of road, ATV trail and motorcycle trail, the occupied surface would be far less than 3%. To expand the example, assume there are really 4 mi of road, 4 mi of ATV trail, and 4 mi of motorcycle trail within this square mile. The total surface area disturbance for these 12

miles of routes is 0.0209, approximately 2 percent.

(See) Table 7 Surface Area Disturbance for 4 miles of Road, ATV, and Motorcycle Trail (12 miles total)

Response

Section 3.5.4 has been revised to clarify the use of the Erosion Hazard Rating (EHR) analysis indicator. While similar in nomenclature, the "Low", "Moderate", "High", and "Very High" categories that result from the EHR assessment are distinct from the "Low", "Moderate", "High", and "Extreme" soil and water resource effect ratings that are determined for each trail proposed for addition to the NFTS. The purpose of the EHR indicator is to give a broad description, for each alternative, of how the prohibition of cross-country motorized vehicle travel would affect the number of miles of motorized roads and trails located in areas at risk of accelerated erosion. The EHR categories are not used to make site-specific determinations of soil and water resource effects for individual trails proposed for addition to the NFTS.

The "Low", "Moderate", "High", and "Very High" risk of cumulative effects ratings from the 1999 HFQLG FEIS, presented in Appendix E of the Soil and Water Resource Report and in Table 23, are reported only to describe existing condition. Motorized road and route density is the indicator used to analyze cumulative watershed effects for this project.

Comment 47

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. G. Manufactured Conclusion

Watersheds with more than 4.0 miles of route per 1.0 square mile are considered at risk of detrimental watershed effect in the PNF SWER.

…for the purposes of this project analysis, Forest watershed staff have determined a road / route density threshold of 4.0 miles per square mile. Watersheds with motorized road and route densities that exceed this threshold are at risk of detrimental cumulative watershed effects.

Known Inputs

- The SWER analysis chose the same route width standard for all routes.
- The SWER analysis uses the chosen threshold for road/route density of 4.0 miles/1 sq. mile in conjunction with the Plumas National Forest's standards for assessing watersheds.
- This measurement standard is the Cumulative Watershed Effects (CWE). The standard is that if CWE exceed the Threshold of Concern (TOC), it is assumed that there are negative effects to the watershed.
- A Cumulative Watershed Effect (CWE) change of 0.8% is not significant.

Conclusions Belie Statements

Accurate calculations for surface area of roads and trails have been presented in this comment, which show that unauthorized roads and trails occupy (disturb) less than one-fifth of one percent of the surface.

The SWER analysis clings to the assumption that its road density threshold of 4.0 miles of route per miles of area adds significantly to surface disturbance, despite the calculations contradicting the conclusion; and statements indicate what it constitutes an insignificant impact.

If the Plumas NF believes an impact at eight-tenths of one percent is not significant, then why does the SWER insist that ATV and motorcycles routes present dire threats to the watersheds?

Example

Here is how the SWER conclusion was manufactured, and how it has affected the structure of the DEIS.
SWER Discussion

The SWER discussion for Watershed 110041 states that deleting a few miles will make a significant difference. When we look at Watershed 110041 on SWER Table 3(Figure 5), we find that even under the No Action Alternative 1, the watershed has a road density of only 4.57 miles per square mile. Even if all those miles were 20 ft wide roads, they would represent less than 2% of the surface area.

With our new understanding of how little area the roads and trails really take up, the discussion looks absurd.

SWER Mistakes Transfer to DEIS
Here is an example of how mistakes in the SWER become wrong statements in the DEIS.

For the two watersheds with the greatest increase in past ground disturbance from 1999–2007, watersheds 110041 and 110192, Alternative 3 would produce significant reductions in road/route density, resulting in densities of 2.93

and 1.75 mi/mi2, respectively. Alternative 3 would add no new trails to the NFTS and would prohibit motorized traffic and allow for the passive restoration of 7.1 and 23.1 miles of routes (respectively) that currently exist in these watersheds. None of the reasonably foreseeable actions presented in Appendix C are proposed within these two watersheds.

For the two watersheds that were determined to have a high risk of CWE in the 1999 HFQLG S, watersheds 110114 and 110159, Alternative 3 would produce significant reductions in road/route density, resulting in densities of 3.96 and 2.68 mi/mi2, respectively.

Faulty SWER Analysis Become Erroneous DEIS Conclusion

The faulty analysis in the SWER has become an erroneous conclusion in the DEIS, which is that the roads and trails are having huge negative impacts, and the Alternatives with the fewest open routes get the best scores. However, the numbers prove that the impacts from roads and trails are insignificant because they occupy a tiny percentage of the surface area.

Response

The cumulative effects methodology has been clarified in section 3.5.4. The changes in ERA percentage values presented in Appendix E of the Soil and Water Resource Report, and the assigned threshold of concern for the watershed presented in Table 23, are reported only to describe existing condition. The density of proposed roads and trails open to motorized traffic, not ERA in relation to TOC, is used as the indicator for cumulative watershed effects of the project alternatives. For all action alternatives (2-5), the cumulative effect to watershed condition, at the analysis watershed scale, is stated to be beneficial.

Comment 48

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. H. Summary of SWER Errors

The SWER rating system in its current form does not disclose any pertinent information about what exists on the ground, and makes the following errors:

- There is no mention about scale, type, size or amount of impact; nor supporting data that establishes that a "rut more than 2 inches deep" represents even the remotest possibility for irretrievable losses. Trails, roads, and ruts in trails and roads, are not now, and never have been considered, an irretrievable loss or an irreversible commitment of resources.
- There is no definition for 'adverse.' What is the difference between 'less adverse', and 'more adverse'? Where does this fall on the NEPA scale of irretrievable losses?
- The ratings include considerations that are not part of a soil and water analysis. All speculations about 'safety considerations' and what is or is not 'economically feasible' are inappropriate for a soil and water analysis.
- No consideration is given to total route length compared to the amount of 'problem area' on it.
- No consideration is given to actual use conditions and 'Surface Preparation.' For Example non-motorized users also on the routes have contributed to impacts, and will continue to contribute after motorized used is stopped (Ziegler 2001).
- The "Timeframe for the Analysis" estimates passive recovery of existing unauthorized routes not proposed for designation is twenty to thirty years. In other words, no improvement at all will occur anytime in our generation. However, the DEIS provides no evidence that any of the non-motorized trail activities will stop after the road is closed to motor access. If there is any "improvement", ever, it will rely on total abandonment of the route including no non-motorized use; no cattle movement using these routes, nor recreational stock use, nor hiking, nor bicycling, nor administrative use, and 100% compliance by the motoring public. The DEIS does not address this.

Response

Section 3.5.6.2 states that adverse effects to soil and water resources due to some of the proposed trails consist of delivery of route-generated sediment to stream channels or capture of a stream channel by the route. Section 3.5.3.1 has been modified to clarify that mitigations available within the scope of the analysis for the FEIS do not include substantial relocation of a proposed trail because the new trail location usually would involve ground outside the geographic area surveyed and analyzed by PNF specialists for this FEIS.

Comment 49

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

10. I. Incorrect Conclusions leading to Severe Omissions

1. Pre-NEPA discussions led to an unknown amount of mileage being omitted from analysis, without public input.
2. The Conclusion of Cumulative Impacts produced negative ratings which went into the DEIS, contributing to the DEIS statements enormously inflating the severity of impacts.
3. This misinformation from the Soils & Water Evaluation Report, influences the writing of the DEIS to such a degree that over half the known inventoried 'unauthorized' routes have been left out of all the alternatives and eliminated from consideration.
4. Then a new Erosion Hazard Rating system has been devised to further filter out routes, with stringent guidelines, also not publicly reviewed.

Scientific Integrity problems

The SWER does not provide the pre-NEPA analysis that this DEIS needs to comply with CEQ standards. Using the SWER results in the DEIS does not fall into the 'unknown information' category, nor does it fall into the 'conjectural' category. It falls directly into the 'scientific integrity' category. That is, the Forest Service knows the differences, but declines to use the correct data to arrive at its conclusions.

The Failure to Use Standard Soil Erosion Modeling Formulas Is an Egregious Omission

Response

Section 3.5.4 has been revised to clarify the use of the Erosion Hazard Rating (EHR) analysis indicator. The EHR categories are not used to make site-specific determinations of soil and water resource effects for individual trails proposed for addition to the NFTS.

Comment 50

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

10. J. Resolution

As a responsible and cooperative participant, CORVA usually prefers to offer feasible requests with our comments, in order that the Decision is made in a timely way. However, the use of the SWER conclusions in the DEIS, as demonstrated in great detail in this comment, cause such severe data errors in the analysis that we would like the entire Soils and Hydrology section of the DEIS revised. Flowing from that, the Forest Service will have to add one more alternative, which is to designate all 1,109 miles of unauthorized routes and prohibit cross-country travel.

Letter 241

Attributes

Attribute	Value
Early Attention	Provides proposals for new alternatives
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

ROC [Recreation Outdoors Coalition] has, in general, been very supportive of route designation. We believe a well designed and managed, sustainable off-highway vehicle (OHV) program is necessary to provide quality riding experiences on the Plumas National Forest (PNF). After review of the DEIS, we recommend the development of a new action alternative that will provide a better balance between motor vehicle access and environmental stewardship.

Comment 2

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Please insert a glossary in the FEIS. There are many acronyms and terms throughout the DEIS that we are not familiar with.

Response

We have tried to be diligent about addressing acronyms and terms when they are first introduced.

Comment 3

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

The January 3, 2008 Notice of Intent/Proposed Action (NOI/PA) stated there were 1,073 miles of unauthorized routes on the PNF of which 375 were proposed for designation or approximately 35 percent. The DEIS Proposed Action states approximately 364 miles of unauthorized routes will be added as motorized trails out of 1,109 miles that were inventoried. Please explain the discrepancy in mileages between the NOI/PA and DEIS PA.

Response

With accurate survey information, several routes were determined to not exist or were actually system roads. Two trails were dropped because we did not have the needed right of way to access those trails.

Comment 4

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Significant Issues

The purpose of scoping is to identify the significant issues that will be analyzed in the Final Environmental Impact Statement. Regulations issued by the Council of Environmental Quality state:

"Agencies shall reduce excessive paperwork by: (g) using the scoping process, not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the environmental impact statement process accordingly."

"(2) Determine the scope and the significant issues to be analyzed in depth in the environmental impact statement.

Forest Service regulations specify the following in developing and analyzing alternatives.

"The EIS shall document the examination of reasonable alternatives to the proposed action. An alternative should meet the purpose and need and address one or more significant issues related to the proposed action.

"Reasonable alternatives to the proposed action should fulfill the purpose and need and address unresolved conflicts related to the proposed action. Be alert for alternatives suggested by participants in scoping and public

involvement activities.

Three significant issues were identified in the PNF's DEIS as a result of public scoping for the Proposed Action. The first dealt with "Access and Recreation Opportunity."

"The proposed action unreasonably restricts motorized recreation use. The prohibition on cross-country travel will severely limit recreation opportunities and access, and the addition of only 364 miles of motorized trails to the National Forest Transportation System (NFTS) provide insufficient public access to PNF lands and unfairly limits motorized recreation.

There is no alternative that responds to this significant issue, which is a serious procedural and regulatory error in the PNF's analysis. Instead of considering an alternative that adds more miles to the NFTS, all the other alternatives propose less miles. The No Action Alternative maintains the status quo, but does not designate any miles to the NFTS. The No Action Alternative is inconsistent with the 2005 Travel Management Rule and Forest Service directives to designate routes and small riding areas. This alternative cannot be selected as it is unfeasible to implement.

No alternative addresses the Purpose and Need to:

"Provide motor vehicle access to dispersed recreation opportunities (camping, hunting, fishing, hiking, horseback riding, etc.). Provide a diversity of motorized recreation opportunities (4x4 vehicles, motorcycles, ATVs, SUVs, passenger vehicles, etc.)."

ROC [Recreation Outdoors Coalition] would like to work with PNF staff to develop another action alternative that considers substantially more miles for designation as motorized trails to comply with NEPA and meet the objectives of your Purpose and Need.

Response

35 miles of additional routes were surveyed based on scopping comments following the release of the Propsed Action. 10 miles were added to Alternative 5 based on those surveys. The purpose and need of the project includes providing access to dispersed recreation. The recreation section of Ch 3 Section 3.2.5.1 Indicator Measure 4 analyzes these effects. The alternatives presented in Ch 2 provide a range of access opportunities. Expansion into the designation of dispersed camping areas goes beyond the scope of the current proposal as well as the capacity of the forest program of work at this time. This action was triggered by the need to implement the TMR and as a result the focus is on motorized access to dispersed recreation. As a result of comments received during scoping, the Alternatives 4 and 5 were modified to increase this opportunity.

Comment 5

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Purpose and Need

One of the Purpose and Need statements says:

"1. There is a need for regulation of unmanaged motor vehicle travel by the public. The proliferation of unplanned, unauthorized, non-sustainable roads, trails and areas created by cross-country travel adversely impacts the environment."

We [Recreation Outdoors Coalition] believe many of these routes are actually temporary Forest Service roads, skid trails or constructed NFTS roads from information found elsewhere in the DEIS such as:

"Many of the existing unauthorized routes were user-created or created for temporary use during the dry summer season."

"Culverts currently exist at stream crossings for many of the existing unauthorized routes."

"Temporary roads, trails and areas built to support emergency operations or temporarily authorized in association with contracts, permits or leases are not intended for public use."

The DEIS states unmanaged OHV use is the reason for the existence of many of these routes. However, we believe most of them were never closed by the Forest Service after logging and other management activities. If you have historical information on which routes were created for management purposes, please identify these mileages in the FEIS.

Response

We do not have this information. The majority of motorcycle routes on the Plumas National Forest were user created. The remaining routes utilized overgrown skid trails, temporary roads and old railroad grades that had been

decommissioned after use but were reopened by the public because the forest was open to cross country travel.

Comment 6

Action: Alternative 2 (Proposed Action Alternative)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternative 2 – Proposed Action

This alternative proposes to add 364 miles of existing unauthorized routes to the NFTS. However, if you review Appendix A, 86 miles of routes have "extreme" resource effects that are outside normal mitigation and require additional environmental analysis. These routes are not proposed for designation. Appendix A lists other trails with "high" resource effects, which require the completion of site-specific mitigation prior to adding them to the NFTS. This affects an additional 91 miles. Other trails have "moderate" resource effects, which also must be mitigated. A total of 171 miles fall in this category.

In actuality, only an estimated 33 miles rated with "low" resource effects will be designated if the Forest Supervisor adopts Alternative 2 (and lesser miles if she selects a different action alternative). Please state this in the description of each action alternative and display a table with the number of miles rated as extreme, high, moderate or low for each alternative, so readers have a better understanding of what will be displayed in the first issuance of your Motor Vehicle Use Map (MVUM). Also include a schedule when all mitigation measures will be completed for each alternative and how they will be funded. The current information on proposed routes is very misleading and almost deceptive as to your real intent.

Response

There is a need to improve the condition of these routes before they are placed on the motor vehicle use map. The extreme resource rating was used to indicate trails that required reroutes and new construction that was not surveyed with this project and is outside the scope of the EIS. Trails with high resource mitigation needs will need to be mitigated before they are made available for use. This may be as simple as trail outsloping to as costly as new trail bridges. There are no trails with high or extreme mitiagtions in Alternative 4 and 52 miles of high mitigations and no extreme mitigations in Alternative 5. Trails with low or moderate mitigations will be placed on the MVUM. Coordination with user groups will occur on trails with high mitigations to determined where we want to work to obtain grants and organize volunteer work parties to complete work necessary to allow these trails to be added to the MVUM.

Comment 7

Action: County or Municipal Laws, Policies, etc.

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Motorized Mixed Use on Other Public Roads through the Plumas National Forest

A key objective of travel management planning is: "To coordinate travel planning and analysis on NFS lands with federal, state, county and other local governmental entities and tribal governments and to allow the public to participate in the designation of NFS roads, NFS trails, and areas on NFS lands for motor vehicle use."

Collaboration with other road management agencies is critical for the development of sound NF travel management plans. ROC [Recreation Outdoors Coalition] is working with affected counties to designate all unpaved county roads through the PNF for mixed use unless an exception exists for public safety, past accidents, resource impacts, user conflicts or other considerations that cannot be mitigated. Our goal is to have an interconnected transportation system for non-highway legal vehicles using unpaved county and NFS roads. If County Boards choose to designate mixed use on their unpaved roads, please review the PNF's designations to provide a seamless transportation system for the riding public.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links. New routes to benefit these networks may be analyzed in the future, but are beyond the scope of the existing routes analyzed by this effort. Further consideration of mixed use on Level 3 roads may be analyzed.

Comment 8

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Access Over Private Lands

The lack of a formal or legal road agreement across private ownerships should not eliminate unauthorized routes from designation. The public can still travel on them through NFS land and the landowner may have given users implicit permission to pass if not gated or signed at the private land boundary. Please summarize your discussions with private landowners for proposed routes that cross their ownerships in the FEIS. If forest routes to private land have existed for decades, now is not the time to close them simply because of the private land issue. They may still have value for firewood collecting, hunting, or other recreation activities. Private landowners can post their property if they wish to restrict public access.

Response

The final rule requires responsible officials to recognize rights of access in designating roads, trails, and areas (§ 212.55(d)). Rights of access include valid existing rights and rights of use of NFS roads and NFS trails under § 212.6(b). This final rule does not affect reciprocal rights-of-way between the Forest Service and private landowners. Some property owners also may possess reserved or outstanding rightsof- way or other rights providing access across NFS lands, which may or may not require a written authorization from the Forest Service. Those rights must be recognized under § 212.55(d). Although many private private landowners allow recreational use of their lands, it is at the iscretion of the landowner what public access, if any, occurs on their lands. The Forest Service does not have the authority to dictate the use of private lands by private landholders within or adjavcent to the forest boundary, and does not have the authority to display any lands without ROWs on the MVUM or to direct the public to cross private lands where a ROW does not exist.

Comment 9

Action: State Rules, Plans, etc.

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

Motorized Mixed Use on Unpaved National Forest System Roads

Under Alternatives 4 and 5, motorized mixed use is proposed on 11.3 miles of passenger car roads. ROC [Recreation Outdoors Coalition] asserts all unpaved NFS roads should be designated for motorized mixed use unless a rare exception exists. Our analysis of the Region's mixed use policy and the California Vehicle Code supports this recommendation.

California Vehicle Code:
The Pacific Southwest Regional Forester has said all NFS passenger car roads (maintenance level 3-5) are "highways" under the California Vehicle Code (CVC). This conflicts with the December 19, 2007 letter from the California Highway Patrol (CHP). Please note, there is no definition for a "highway" "public highway" or "forest highway" in Forest Service Manual 7700, except in FSM 7741.1, which states:

"Forest highways are a special classification of forest roads. They are specifically designated State or local government roads that meet the criteria listed in 23 CFR 660.15. The designation of forest highways is not intended to form a 'system' of roads. Instead, the purpose of the designation is to identify State and local government roads that qualify for construction and reconstruction funding under the forest highway program. To qualify for designation as a forest highway, a forest road must: 1) be a State or local government road that is open to the general public. A forest development road may have the designation of a forest highway, provided that the Forest Service assures the Federal Highway Administration that a State or local government agency will assume jurisdiction and maintenance responsibility upon completion of improvements."

"Road" is the only term used throughout the FS directive system. By its own manual direction, the Forest Service manages roads, not highways. Any link to the CVC term "highway" is incorrect. Only State and local agencies manage highways.

Unpaved NFS roads (regardless of maintenance level) are not considered "highways" under CVC 38001, which states: "For the purposes of this division, the term 'highway' does not include fire trails, logging roads, service roads regardless of surface composition, or other roughly graded trails and roads upon which vehicular travel by the public is permitted." CVC 38026 only applies to paved highways. OHV travel on unpaved county and NFS roads is legal.

The Deputy Commissioner of the California Highway Patrol sent a clarifying letter to the R5 Regional Forester on December 19, 2007, which said in part:

"We are not familiar with all the ML 3 Forest Service roadways, but if they are gravel or other dirt or unpaved roads that have been operating as mixed use roadways for years, it is our belief these roads would fall under the "roughly graded trails and roads upon which vehicular travel by the public is permitted" portion of Section 38001 VC and would, therefore, be eligible for your mixed-use definition." (Underline added for emphasis.)
FS maintenance levels are irrelevant to the CHP and the public. The most distinguishing characteristic of a road is its surface composition. Is it paved or not? Unpaved NFS roads are not "highways" under the CVC.

ROC understands the FS definition of maintenance level (ML) 3, 4, and 5 roads as being passenger car roads. However, our interpretation of current FS Manual and Handbook direction is this: Prudent drivers of standard passenger cars, in nearly all cases, stay on ML 5 (paved) roads. We believe all paved (asphalt, chip seal, etc.) roads should be ML 5 roads. Nearly all ML 3 and 4 NFS roads are unpaved.

Most NFS passenger car roads are unpaved, single lane with design speeds less than 25 mph and low average daily traffic counts (Source: FS INFRA Roads). NFS passenger car roads provide important links to the PNF's maintenance level 2 road system and motorized trails. "Share the road" information, maps, speed limits, and/or road signs will greatly enhance visitor safety on all unpaved ML 3-5 roads designated for mixed use.

Based on a traffic survey ROC did on 72 miles of ML 3-4 roads on the Lassen National Forest in 2005, we believe almost all traffic on NFS passenger car roads is high clearance vehicles (pick up trucks, sport utility and trail rated vehicles). It is a misnomer for the FS to continue to refer to unpaved ML 3-5 roads as "passenger car roads." On the Lassen National Forest, only 10 percent of the use on ML 3-5 roads was actually passenger car. The rest were high clearance vehicles or non-highway legal vehicles.

The DEIS states:

"The Forest undertook a transportation planning effort in the 1920's with a focus on access for fire protection, but little road construction actually occurred. The Civilian Conservation Corps built some roads in the 1930's. In 1935 another Forest transportation study was conducted, again with the goal of enhancing fire protection, but little road construction occurred until America entered World War II, when emphasis was directed towards developing access to strategic mineral deposits.

In the late 1940s, America demanded timber to support its building boom. Congress appropriated large road budgets to develop an infrastructure for removing timber from previously remote areas. Main roads were designed and constructed by the Bureau of Public Roads, now the Federal Highway Administration; these roads were normally constructed to highway standards. The Forest Service was responsible for providing a long-term, sustainable flow of timber. Development of a system of lower-volume project roads, such as the roads within timber sale areas, fell to the agency.

The majority of the roads on the Forest were constructed from 1960 through 1990 in support of a robust timber program, which averaged 203 million board feet of timber from 1974 to 1990. Road construction programs were large.

By the mid-1980s, the amount of new road construction began to taper off. The timber program was fluctuating, and the majority of the arterial and collector road system was in place. New road construction was primarily limited to short spur roads needed to access individual timber stands."

In ROC's view, most PNF roads are logging, fire or service roads and fall under the exemption from a "highway" in Section 38001 CVC:

"For the purposes of this division, the term 'highway' does not include fire trails, logging roads, service roads regardless of surface composition, or other roughly graded trails and roads upon which vehicular travel by the public is permitted."

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3,4 and 5 Roads.

In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the

Plumas NF is consistent with this direction.

Comment 10

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Motorized Mixed Use Policy for the Pacific Southwest Region:

The Region 5 motorized mixed use policy cites the CVC for prohibiting non-highway legal travel on ML 3-5 roads. However, agencies may propose "combined use" on highway segments if the procedures in Section 38026 CVC are followed and the CHP concurs. Since the Regional Forester says ML 3-5 roads are subject to the CVC, and then the correct term to permit non-highway legal vehicles on NFS "highways" is "combined use", not mixed use. If a Forest Supervisor assumes supremacy over the CVC in the management of NFS passenger car roads, the correct term would be mixed use. If the Regional Forester accepted CHP's interpretation that the CVC does not apply to unpaved ML 3-5 "roads", then the correct term to permit non-highway legal vehicles on these roads is also mixed use.

Response

The Regional Forester has authority to align mixed use on ML 3-5 roads with language in the California Vehicle Code.

Comment 11

Action: Consider Additional Information

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Engineering Analyses:

Under the Region's current policy, Forest Supervisors are constrained from designating passenger car roads for "combined use" if road segments are greater than three miles (Section 38026 CVC). Forest Supervisors may exceed this length if they assume supremacy over the CVC in accordance with 36 CFR 212.5(a) (1) and the response to public comments to the 2005 Travel Management Rule, which says:

"Under the current rule, traffic on roads is subject to State traffic laws where applicable, except when in conflict with the Forest Service's prohibitions at 36 CFR part 261. If there is a conflict, the agency's prohibitions preempt State traffic laws. To ensure that the agency's intent with respect to designation of roads, trails, and areas is fully effectuated, the proposed and final rules also provide for preemption of State traffic laws when they conflict with those designations."

Per Forest Service national direction, an engineering analysis is required to assess the probability and severity of crashes on roads proposed for mixed use. Where the criteria in FSH 7709.55, 30.3 are met, the PNF may prepare an engineering judgment instead of an engineering report. These three criteria are:

"When all of the following conditions exist, a qualified engineer may document engineering judgment that an engineering report is not needed to designate a road for motorized mixed use:

- The proposed designation is consistent with State and local law (and it is for unpaved NFS roads regardless of maintenance level according to the CHP).
- The road being considered for designation currently has motorized mixed use.
- There is no documented crash history involving motorized mixed use on the road or similar roads in the vicinity."

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

Comment 12

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

The Regional Forester's January 13, 2009 motorized mixed use letter of direction to the Forest Supervisors is a concern to ROC [Recreation Outdoors Coalition]. The Region's mixed use policy invalidates mixed use proposals on passenger car roads greater than three miles unless you:

- Lower the maintenance level;
- Assume supremacy over the CVC on these roads; or
- Disregard the CVC.

In the DEIS, the PNF is proposing to designate 11.3 miles (three roads) as "combined use" pending the results of your engineering analysis. All of these roads are greater than three miles. Please explain in the FEIS how the Regional Forester can cite the CVC to prohibit motorized mixed use on NFS passenger car roads, but then allow it on certain roads or road segments that are greater than three miles in conflict with Section 38026 CVC. It appears the Forest Service is applying as well as ignoring the CVC at its own discretion. This inconsistency is confusing to the public.

Proposing "combined use" designations requires conformance with Section 38026 CVC and review by the CHP. Segments must be less than three miles, which will prohibit non-highway legal vehicles on hundreds of miles of roads in the PNF. We doubt the CHP has the personnel or funds to review many of these analyses.

The Regional Forester's January 13th letter also describes the steps for reclassifying a ML 3 or 4 roads to ML 2. These steps are both time consuming and expensive, and impose a significant burden on Forest Supervisors. Few are likely to be considered.

Please analyze a new alternative that designates all unpaved PNF ML 3-4 roads for motorized mixed use (510 miles), and prepare engineering judgments when the three criteria above are met. Explain why mitigations would not be effective if a road is not designated for motorized mixed use. Include all engineering reports in an appendix so the reader understands why some roads are not recommended for non-highway legal vehicle travel.

If the PNF chooses to designate all 510 miles of ML 3-4 roads for mixed use, the Regional Forester's Team (RFT) must concur with your proposal. Isn't the RFT about 50+ people? Will many proposals be approved? ROC believes the Regional Forester's January 13th letter is doomed to fail the OHV community as not many mixed use or combined use proposals will be submitted.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads and how to apply consideration of mixed use or combined use on roads of any length.

Comment 13

Action: NEPA Process General

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

ROC [Recreation Outdoors Coalition] disagrees NEPA is triggered when there is "any change to current restrictions or prohibitions regarding motorized travel by the public (for example: prohibiting cross-country travel, changing management—changing vehicle class or…setting road maintenance levels and changing maintenance levels are administrative and not subject to NEPA. However, changes in allowed vehicle class, season of use, access, and proposals to reconstruct facilities are subject to NEPA." Adding a vehicle class to existing ML 3-4 roads does not induce additional physical or biological effects that trigger NEPA. The incremental increase in noise, dust, traffic volume, etc. above current road uses is insignificant.

Response

We agree that changing road maintenance levels are administrative and not subject to NEPA.

Comment 14

Action: Traffic control and safety

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Public Safety on Mixed Use Roads:

ROC [Recreation Outdoors Coalition] asserts the Forest Service does not have enough mixed use accident data from Region 5 national forests to adopt a regional policy that prohibits motorized mixed use on thousands of miles of unpaved passenger car roads in California. We found Region 5's mixed use accident information does not substantiate the agency's concern about public safety. In the past 15 years, there have been 11 mixed use accidents on 41,501 miles of FS roads in California. Three accidents involved FS employees running into an OHV (one on the PNF); one involved a County Deputy Sheriff hitting an OHV. The data does not indicate the road maintenance level where these accidents occurred. ROC asserts unpaved ML 3-4 roads should be open to all vehicle classes unless an exception exists for some road segments due to public safety, past accidents, resource concerns, user conflicts or other considerations that cannot be mitigated. The Regional Forester should follow Forest Service national direction and the agency's own guidebook for analyzing mixed use on FS passenger car roads.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

Comment 15

Action: Mitigation/BMPs

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Minor Operators on Mixed Use Roads:

The CHP, State Off-highway Motor Vehicle Recreation Division and ROC [Recreation Outdoors Coalition] share equal concern with the Forest Service over the safety of minors driving non-highway legal vehicles on NFS or other public roads. However, we believe State requirements for minor operators are sufficient. The answer is not to eliminate this use, but to mitigate it in the best way possible. As an example, the FS does not prohibit hiking, mountain biking, skiing, snowboarding, rock climbing, hunting, firearm use, driving with street legal vehicles or other recreational activities on the national forests. There are risks associated with all of these sports and, yes, some fatalities. The Forest Service should manage OHV risk, not eliminate the activity or prohibit youth under 18 or 16 years from participating. (Even FS employees have motor vehicle accidents!)

There are numerous safety training programs for youth offered by the State, vehicle manufacturers, state-wide OHV organizations, and local OHV clubs. If there are continued safety concerns, the FS should approach the California Highway Patrol and State OHMVR Division to see if State safety requirements for minors need to be strengthened.

The Forest Service should impose temporary road closures for certain vehicle classes (i.e. OHVs) when commercial traffic is present, such as log haul during timber sales. This is an appropriate mitigation measure for public safety.

Response

The State establishes regulations that apply a different standard for motorized vehicle operation than for other recreational activities. State laws regarding minor operation of OHVs is beyond FS jurisdiction.

Temporary road closures are appropriate in certain circumstances.

Comment 16

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Mixed Use and the Highway Safety Act:

ROC [Recreation Outdoors Coalition] has reviewed and commented on several environmental documents for travel management from other Region 5 national forests. They state passenger car roads are subject to the Highway Safety Act (HSA). Please note, roads subject to the HSA have to meet certain safety standards as defined in FSM 7733 and FSH 7709.59 (2/09). The HSA, however, does not prevent the Forest Service from designating these roads for travel by non-highway legal vehicles. Please do not cite the HSA as a reason for prohibiting motorized mixed use on NFS roads on the Plumas National Forest.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads. Consideration of the Highway Safety Act in determining this direction is the discretion of the Regional Forester.

Comment 17

Action: Seasonal Closures

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Seasonal Restrictions

The Travel Management Rule allows the FS to adopt seasons of use and emergency closures. "Seasons of use" should also be considered for other NFS roads and trails when you develop your alternatives to prevent vehicle damage when road surfaces are wet and to reduce your road maintenance costs. However, wet weather closure plans should be based on weather-related criteria (rainfall, soil conditions, etc) and not set dates. However, this is how you manage your fuel wood program – the dates and times when cutting is permitted change every year based on weather conditions. We recommend the same approach for seasonal road closures. ROC [Recreation Outdoors Coalition] assumes any "season of use" for specific roads applies to everyone, including Forest Service vehicles. Please respond to that assumption in the FEIS.

Response

A legal opinion from the Office of General Council was used to form Regional policy that dates would be used to establish closure seasons. Dates define the most consistent criteria that can be enforced on the basis of the Motor Vehicle Use Map. Other considerations for using dates, from the standpoint of feasibility, include the personnel and resources required to assess soil and weather conditions on an ongoing basis and timelines to prepare, publish and inform Forest Orders, that are likley to exhibit variance across the Forest topography. The Forest has sought to minimize closure seasons on the basis of typical annual conditions, however, it is understood that circumstances within any given year may allow or require changes to season length by Forest Order, once this decision is implemented.

The agency has discretion to establish different criteria for administrative and recreational use of Forest Service roads.

Comment 18

Action: Enforcement/Funding/Staffing

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Affordability Analysis and Road Maintenance Levels

The FSM states: "Consider maintenance and administrative obligations and capability in the context of future budgets and staffing. Administrative units and ranger districts should avoid adding routes to the forest transportation system unless there is adequate provision of their maintenance. Grants, agreements, and volunteers may be used to extend Forest Service resources".

ROC [Recreation Outdoors Coalition] is concerned about the Agency's liability due to the lack of maintenance of NFTS roads. The PNF has approximately $154,000,000 in deferred road maintenance.
Table 12 displays the Forest's annual estimated road maintenance costs. The cost to maintain a ML 3 road is almost 20 times the amount to maintain a ML 2, high clearance road ($2,718 vs. $136 respectively). The annual maintenance cost for a ML 4 and 5 roads is 26 times more expensive than a ML 2 road. All alternatives require over $2.3 million annually to maintain the PNF's road system compared to an average budget of $1.9 million. "The remaining short fall means that some roads are not maintained on a yearly basis and maintenance is completed on roads with the most use."

Please describe in the Affected Environment section of FEIS how many miles of roads are maintained to their objective maintenance level in accordance with Forest Plan standards and guidelines. Describe how this may change under each alternative. The DEIS states:

"A significant portion of the road system initially developed to facilitate timber harvest now accesses lands where timber harvest is either not permitted or is not the primary management emphasis. This means that the road system will receive very limited amount of maintenance funding from timber harvest in the future."

Response

The Facilities Section of Chapter 3 has been modified to reflect current contract costs. Road maintenance is based on need and on a general time schedule. There will be no difference between alternatives on how much is spent on road maintenance.

Comment 19

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Reducing objective road maintenance levels should be seriously considered to bring your road maintenance program in alignment with the PNF's expected out year budgets. "Setting road-maintenance levels and changing maintenance levels are administrative, and not subject to NEPA." Since passenger car travel will not be prohibited and operators can choose to drive their passenger cars on ML 2 roads, NEPA is not required. It makes little sense to maintain roads to a higher ML if passenger cars are a minor component of the traffic. ROC [Recreation Outdoors Coalition] believes "prudent drivers in standard passenger cars" with P-rated tires almost always stay on paved roads. The primary vehicle class using the road should drive the assignment of objective road maintenance levels and not vice versa. ROC does not consider the PNF's unpaved ML 3 and 4 roads to be passenger car roads or "highways." They are "roughly graded" and becoming more so over time. The lack of road maintenance is a serious liability issue for the Agency.

As an option to reduce your maintenance costs, temporarily raise the operational ML of a road to provide more economical commodity haul (or for some other management purpose), then lower the operational ML when the activity has ended. Consider converting some ML 2 roads with low use to motorized trails to further reduce your maintenance costs. Assign your objective maintenance levels commensurate with your use.

Response

Decisions involving analysis and changes to individual system roads, whether new roads, road decommissioning or maintenance level reclassification were not part of this analysis. Exception was made to address several roads in discretionary consideration of mixed use. Road system changes may be considered in the future.

Comment 20

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Please provide information in the FEIS about the traffic volume and vehicle classes using PNF passenger car roads. This will help the public understand the PNF's need to maintain 638 miles of passenger car (ML 3-5) roads.

Response

Analysis of maintenance level classification of system roads was not required by the purpose and need of this FEIS.

Comment 21

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

When motorized mixed use is designated on a road in California, State OHV Trust Funds may be used to maintain the road. They will help reduce the PNF's backlog of road maintenance if the FS chooses to apply for these grants. This is another reason for lowering your maintenance levels and allowing mixed use.

Response

Reclassification of system road maintenance levels on the basis of State OHV Trust Fund distributions was not part of this analysis.

Comment 22

Action: Volunteer Groups and Partnerships

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please address the opportunity to use volunteers to maintain roads if they are designated for mixed use (e.g. remove vegetation encroachment). Describe your current OHV volunteer program and its potential to assist with the Forest's future road and trail maintenance through such programs as Adopt-a-Trail or Adopt-a-Road.

Response

Trail maintenance will be dependent on volunteer programs. Trails with low or moderate mitigations will be placed on the MVUM. Coordination with user groups will occur on trails with high mitigations to determined where we want to work to obtain grants and organize volunteer work parties to complete work necessary to allow these trails to be added to the MVUM.

Comment 23

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Parking and Dispersed Camping Off Roads
Describe whether big game retrieval, parking or dispersed camping off designated roads, trails or areas will be allowed. The DEIS is ambiguous about this, except to say "ongoing management of individual dispersed campsites provides resource protection, and there was no immediate need limit or regulate dispersed camping."
Later in Chapter 3, the DEIS states:
"Motor vehicle access to dispersed recreation opportunity is reduced in all action alternatives (Table 10). The action alternatives result in a relative decrease in the number of dispersed recreation opportunities within 300 feet of proposed OHV trails by between 66 to 80%, compared to Alternative 1. In all action alternatives, access to dispersed sites located within 300 feet of water has decreased by 63 to 89%. This distance, while highly desirable to recreationists, corresponds with the extent of riparian habitat conservation areas (RHCAs) for perennial streams, lakes, and ponds, which are provided with protections in the Forest Plan and the Sierra Nevada Forest Plan Amendment."
Please note the percents above are incorrect according to Table 10. Under Alternative 3, no access is provided within 300 feet of proposed motorized trails or within 300 feet of water. For this Alternative, access is decreased by 100% as no unauthorized routes are proposed for designation.
Of the 91 inventoried dispersed campsites accessed by an unauthorized route, we believe the following table is more accurate according to your data.

Alternative - Sites w/in 300' of proposed trails - Sites w/in 300' of water - # of sites w/decreased motor vehicle access
1 unknown 35 0
2 31 13 44
3 unknown unknown 91 (all)
4 18 4 22

5 28 10 38

Please clarify this discussion in the FEIS as it appears a significant number of dispersed campsites will have no direct motor vehicle access. The Sierra Nevada Plan Amendment does not prohibit recreational or motor vehicle use within Riparian Conservation Areas (RCAs); it says to evaluate new activities for consistency with riparian conservation objectives. As a baseline, describe the total forest acres within Riparian Habitat Conservation Areas (RHCAs), how many acres of existing NFTS roads are within RHCAs, and the incremental increase in acres from unauthorized routes accessing dispersed campsites. Describe how many unauthorized routes and dispersed camps are hydro logically connected to a stream or lake or have diversion potential to them. Explain why mitigation would not be effective. In relation to your NFTS and total RHCA acres, it seems to us, there will be very minor effects on RHCAs, and soil and water quality from these designations.

Response

The proposed trail mileage for Alternative 4 and 5 have increased based on public comments. Dispersed recreation opportunities were updated to include sites that are available from system roads. Trail access to dispersed sites may be added in the future. 3.2.5.1 Indicator Measure 4 displays the impacts to disperse sites. The assumption made is that the dispersed recreational activities are not restricted only the way you access those sites. The recreation section shows the dispersed sites that are accessible by motorized vehicles. The inventory of dispersed sites is a sample of sites that can be found on the Plumas National Forest.

Comment 24

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

ROC [Recreation Outdoors Coalition] recommends continued access to all historically used dispersed campsites. At some campsites, please consider designating an area for vehicle parking to protect riparian areas, meadows or other sensitive resources. Monitor these sites to determine if other mitigation is required.

Response

See Recreation Section 3.2.5.1 Indicator Measure 4 for specific information on reduced dispersed camping opportunities. Additional trails can be added in the future to access dispersed camp sites that were not included in this analysis.

Comment 25

Action: Goals and Objectives/LRMP Consistency

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

ROC [Recreation Outdoors Coalition] recommends parking be permitted within 30 feet from any designated road, trail or open OHV area when it does not cause damage to national forest resources or facilities. This is consistent with the new FS travel management directives found in FSM 7716.1. Regulations in 36 CFR 261.15 allow FS officers to issue violation notices for damage to national forest resources. Monitor use and determine if this length needs to be modified in some areas.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Comment 26

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

ROC [Recreation Outdoors Coalition] recommends other dispersed camping (separate from the historically used

campsites) be permitted within 100 feet of a designated road, trail or OHV area when it is feasible to do so and does not cause damage to national forest resources or facilities. (Refer to FSM 7715.74 and FSM 7716.13.) Monitor impacts to see if access needs to be modified in some areas.

Response

See Recreation Section 3.2.5.1 Indicator Measure 4 for specific information on reduced dispersed camping opportunities. Additional trails can be added in the future to access dispersed camp sites that were not included in this analysis.

Comment 27

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

ROC [Recreation Outdoors Coalition] recommends the PNF seasonally allow cross-country travel with all-terrain vehicles for the specific purpose of big game retrieval (barring any wet weather, fire-related or other off-road closures already in place). See FSM 7715.74 and FSM 7716.13 for designations for big game retrieval. This is a reasonable accommodation to hunters. Vehicle operators causing damage to national forest resources can be cited.

Response

The Plumas National Forest is considered to be a heavily roaded forest, providing ample opportunity to retrieve game without traveling cross-country. Therefore, designating areas for cross-country travel for big game retrieval was not identified as part of the purpose and need for this project and is outside the scope of this project.

Comment 28

Action: Cumulative/Combined Effects

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Environmental Consequences of the Alternatives

General Comments: ROC [Recreation Outdoors Coalition] believes the overall impacts from adding unauthorized routes is so minor, that when aggregated with other impacts occurring across the forest landscape (existing roads/trails, vegetation management, wildfires, mining, grazing, etc.), they are imperceptible and discountable. Because the PNF has not described the affected environment where all these activities take place, the additive or cumulative effect from designating unauthorized routes has been taken out of context. These routes are already in place and are being used. Impacts have already occurred and will likely remain the same if designated. The adverse effects from route designation are minor compared to the impacts from cross-country travel, which will now be prohibited.

The environmental consequences section should consider the designation of unauthorized routes in relation with existing NFTS roads and trails. For example, Table 62 on page 187: How many miles of NFTS roads and trails are within .25 mile radius of spotted owl Protected Activity Centers? How many miles of NFTS roads and trails are within 0 to 800 meters of bald eagle territories? How many miles of NFTS roads and trails are within RCAs or Critical Aquatic Refuges or intersect willow flycatcher habitat? When you add the miles of unauthorized routes, what is the cumulative effect? How many nest sites, habitat areas or riparian acres do not have any roads, trails or unauthorized routes? We believe the effects from the unauthorized routes are almost indiscernible if you provide the context of what is actually happening. Failure to do so is a serious flaw with this DEIS.

Response

No road density calculation, which would have included NFTS Roads, were factored into the Owl, Eagle, or Willow Flycatcher analysis. NFTS roads were included as part of the existing condition for these species, whereas unauthorized routes and proposed trails were evaluated for direct, indirect and cumulative effects.

Comment 29

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Soils and Water: Please explain what the numbers mean in Table 23, page 105.

Response

Table 24 is a summary of the soil and water resource effects indicators. The meaning of these indicators is described throughout section 3.5.

Comment 30

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Terrestrial and Riparian Species: We [Recreation Outdoors Coalition] are unclear why you are discussing Pacific fisher, wolverine and Sierra Nevada red fox when no detections have occurred anywhere on the PNF. We recommend you delete these kinds of discussions from the FEIS. The reintroduction of fisher is speculative unless there has been a "Proposed Action" issued to do so.

Response

Although the commentor is correct that no fisher, wolverine or red fox have been detected on the PNF, the Forest Service under Forest Service Manual Direction at 2670, is requried to assess the effects to suitable habitat for these species that are listed as Forest Service Sensitive.

The decision to reintroduce Fisher onto SPI lands has not been finalized by the Department of Fish & Game, however, the Department does have a proposed action and is planning to issue a Negative Declaration in the near future (Fall 2009). Whether the Fisher disperses onto Forest Service lands is purely speculative at this time, as noted by the commentor and cannot be analyzed in detail in the FEIS. It is unknown whether the fisher will disperse onto the Plumas NF and how they maybe affected by ongoing uses on National Forest System Lands. However, in presentations made by the Department, Sierra Pacific Industries and Dr. Roger Powell (principal investigator), the Sterling Tract re-introduction is designed to test and evaluate the effects of forest management on the Fisher. This approach will allow researchers to learn how forest management affects Fisher occupancy, home ranges, movements, etc. Should fisher occupy National Forest System lands in the future, management of National Forest System lands will follow direction in the 2004 Sierra Nevada Forest Plan Amendment and associated standard & guidelines for the Fisher.

Comment 31

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

There are numerous incorrect table references throughout this section, which is confusing.

Appendix A: List of Routes and Resource Impacts

Please display this resource information for all 1,109 miles unauthorized routes in the FEIS so the reader understands why some are not proposed for designation.

Response

This information does not exist.

Comment 32

Action: Alternatives General (add, change, delete)

Resource(s): Land Designation and Management

Disposition: Resolved: Other (SEE RESPONSE)

ROC's [Recreation Outdoors Coalition] Proposed Alternative

Please consider a new action alternative that provides a better balance between access and environmental protection. This alternative has the following elements:

- Assume supremacy over the CVC and designate all unpaved ML 3-4 roads for motorized mixed use unless a rare exception exists that cannot be mitigated. Designation of these roads will provide important connectors to your ML 2 road and motorized trail systems. The Granite Basin area is a good example. Most of 23N18 is an unpaved ML 3 and 4 road, single lane, with a traffic service level of C (flow interrupted, use limited). 23N95Y is an unpaved, single lane, ML 3 road with a traffic service level of D (slow flow or may be blocked). Unless designated for motorized mixed use, restrictions on roads like these will significantly reduce loop opportunities for operators of non-highway legal vehicles. ROC also notes both of the above roads are labeled as Potential Forest Service Roads (PFSR). ROC understands PFSR roads are potential Forest Highways and another local agency will assume jurisdiction over them when they are improved. Is there concurrence from the county to assume jurisdiction over your PFSR roads? Few counties we have spoken with want to add more roads to their system as they cannot maintain the ones they have now. Until then, manage PFSR roads as NFTS roads.

- Include all engineering analyses in an appendix to the FEIS so the public understand why some routes are not recommended for mixed use.
- Provide access to all historically used campsites.
- Implement seasonal restrictions based on wet weather criteria, not on specific dates that have no relation to actual conditions on the ground.
- Collaborate with local OHV organizations, the Sierra Access Coalition, and ROC to analyze additional unauthorized routes desired by these groups. Segments of some paved passenger car roads for motorized mixed use may also be needed for connectors. Include the resource analysis of these routes in an appendix to the FEIS and why mitigation would not be effective if any are not proposed for designation. The DEIS states under 2.3.2 Implementation Strategy:

Begin working with a collaborative group of public stakeholders within six months of the final decision. This group would work together with the Forest Service to implement the designated system…

ROC recommends PNF staff spend more time collaborating with the public on upfront planning for your system. Work with interested users and organizations on the development a new alternative that has greater acceptance and the balance of opportunities we seek.

Response

The Plumas National Forest is following Regional policy with respect to ML 3-5 roads.

Analysis of ML 3-5 roads was a discretionary part of this analysis in consideration of mixed use. Consideration of all ML 3-5 roads and whether there should be additions, decommissions, or reclassifications was not required for this decision. This decision does not prohibit future consideration of system road reclassifications for either mixed use or maintenance level.

Consideration of future jurisdictional issues is beyond the scope of this analysis.

The implementation strategy includes further public collaboration.

Letter 242

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 1

Action: Enforcement/Funding/Staffing

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

On hikes in Plumas and adjacent Lassen National Forest, I too have noticed a dramatic increase in Off Highway Vehicles and signs of OHV use even in the most remote and difficult to access locations. I have seen gates torn down, trees and very large logs cut through, stream banks eroded; vegetation crushed, and wheel tracks along and crossing even the Pacific Crest National Scenic Trail into Research Natural Areas and Spotted Owl Habitat Areas. It is not unusual to find beer cans, shotgun shells, and signs shot up almost anywhere, showing that many Forest visitors have little fear of being caught doing prohibited activities. The area that the Forest Service manages is too large for your personnel to oversee alone, without a lot of help from user groups and conscientious individuals who also enjoy our public lands.
You have a daunting task in trying to "ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands", as directed by the November 9, 2005 Final Rule in the Federal Register.

Comment 2

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Though many participants in this process view the primary issue being one of maintaining public access, more roads and motorized trails are not always compatible with other Forest values such as clean water, the vitality of forest and aquatic species, and enjoyment of quiet, non-motorized recreation of many sorts. As you know, not every location must be managed for multiple uses. OHV enthusiasts claim too much of the forest was inaccessible even before it was closed to cross-country motorized travel, but outside of Wilderness much of the Forest already has more than 2 miles of National Forest Transportation System roads and motorized trails per square mile.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Difficult terrain seems to draw many OHV users wanting a challenge or seeking solitude, as is evident by the 1109 miles of unauthorized routes you found. That you have determined that only up to 364 miles (32.8 %) of those routes are suitable be added to the NFTS, shows a great need to get better cooperation from OHV users and better education and acceptance of where OHV use is appropriate and where it is not. While examining the DEIS alternatives maps, it appears to me that new routes are proposed to be added to the system mainly where user-created routes are most densely found, probably because those areas are where it would be most difficult to exclude OHVs. That the Biological Evaluation and Biological Analysis for this DEIS found significant benefit from closing most user-created routes, however, seems to indicate that even many of the places where new routes are proposed to be added are important habitat for forest species. In my opinion, that does not mean that those species, some of which are threatened, endangered, or sensitive, are equally comfortable where road density is high, but instead that road density over most of the forest is overall quite high, leaving little obvious choice of travel direction even if those animals strive to avoid the noise, lack of cover, and other adverse effects that roads bring, not the least of which is an influx of hunters during hunting season.

Response

Threatened, Endangered and Sensitive species were analyzed in the DEIS and FEIS under Chapter 3, Terrestrial Wildlife Section. Road densities were considered in the evaluation of effects to wildlife species and were analyzed in detail for Mule Deer and Forest Carnivores.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

More System Roads Must be Included in This Analysis

You have determined that existing National Forest Transportation System roads and trails will not be considered for repair, reconstruction, or decommissioning as part of this proposal. I think that is a major omission. Since you are considering the downgrading of some roads to allow loop drives and better access by green-sticker vehicles to dispersed recreation sites, you are considering changes to the NFTS.

There are already 4,137 miles of National Forest Transportation System roads and motorized trails on Plumas NF, yet you are proposing to add up to 364 more miles of user-created routes to the system. This is proposed even though your Travel Management Biological Evaluation / Biological Assessment states that, "route density thresholds for wildlife have not been established on the Plumas National Forest" (page 14). You state that therefore road density and "the number of miles of motorized routes is used to measure relative disturbance potential to terrestrial wildlife species on the Plumas National Forest" (page 15).

In the DEIS, Table S-3, Summary of environmental consequences by alternatives, you rank Alternative 1, the no-action alternative that would allow cross-country motorized travel to continue and leave 1109 miles of user-created routes in use, as having 5 times the negative effect to terrestrial biota as would Alternative 3, which adds no new routes to the NFTS. Wouldn't this same logic indicate that reducing the miles of system roads by 26.8% (1109 miles divided by 4137 NFTS miles) would have 5 times the benefit to terrestrial biota as leaving all existing system roads in use?

Judging by your estimate that all 4 alternatives analyzed for reducing the miles of unauthorized routes on Plumas National Forest would significantly reduce direct and indirect negative effects to habitat connectivity for Threatened, Endangered, & Sensitive species over the no-action alternative, analyzing some system roads for closure would have significantly greater benefit to those species you are charged with protecting.

Response

To clarify, the rank that was provided to each alternative (1-5) was based on a simple rank of 1 to 5, and not as a mulitplier effect as suggested by the commenter. In no way did the biologist use the flawed logic presented by the commenter in his/her analysis. In addition, system roads were analyzed in the cumulative effects sections for those species where system roads posed a cumulative effect. In addition, the 4,137 miles of system road are also part of the exisitng condition on the Plumas NF, and were considered in the context of existing distribution and occurrence for the species analyzed.

Comment 5

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Allow More Vehicle Types on More System Roads, but Close More Redundant and Poorly Located Roads

OHV enthusiasts will probably argue that allowing more routes to be used for motorized transportation will better spread such use over the Forest and thus reduce the impacts associated with any one route. This may be true in some areas; but in much of the Forest the density of even just the authorized NFTS routes is greater than 2 miles per square mile. There are already plenty of OHV route choices existing on the Forest without adding more; and even green-sticker ATVs and motorcycles could be accommodated by allowing those on more of the existing NFTS roads, even if many of the redundant system roads were decommissioned. That seems like a better compromise than what is proposed. Let the ATV and motorcycle users utilize more of the whole Forest road network, but close a lot of those system roads, especially routes in sensitive wildlife habitat and wherever there are now relatively low-road-density areas connecting such habitat, to allow for more unimpeded wildlife migration and genetic renewal of the species living in our National Forests.

You state in the DEIS that "Decommissioning occurs on an ongoing basis when roads and trails are no longer needed or are relocated for resource protection. Typically this occurs as part of vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects." That same document, on page 3, states, however, that with such previous projects, with the Plumas National Forest Land & Resource Management Plan itself, and with the Roads Analysis Process, only 56 miles of system roads and 91 miles of unclassified roads have been decommissioned on Plumas NF!

Table 52 in the DEIS lists ten road-and-trail-associated effects to wildlife that apply to system roads as well as to user-created OHV routes. The last two listed effects, disturbance and physiological response, involve the noise generated by vehicles. Though ATVs and motorcycles utilize a smaller track and do not usually travel as fast as vehicles on maintained roads, the noise from such vehicles is often greater, and expanding the areas where such vehicles may legally be used would increase the range of road and trail associated effects from those vehicles in those areas.
To reduce vehicular noise conflict with wildlife habitat desirability, shouldn't the goal be to remove most roads from areas we want wildlife to frequent, and to direct OHV users elsewhere?

Response

The responsible official, at the start of the project, determined a purpose and need for the project to implement

subpart B of TMR through the prohibition. As a result of this action they also determined a need to take actions to address access and motorized recreation opportunities that would otherwise be limited through the prohibitiion. Given this scope, the responsible official determined that existing programs and actions on restoration (stream restoration, road decommissioning, habitat improvement, abandoned mine reclamation etc.) are adequate, and that ground disturbing activities would be outside the scope of this project. These activities involve a different, broader set of considerations and resource impacts than the scope of this project (administrative needs such as fire, fuels, veg, special use permit, non motorized, etc).

Comment 6

Action: Alternatives General (add, change, delete)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

The Alternatives Analyzed Do Not Sufficiently Protect Deer Herd Migration Routes

What specific road density threshold is the Forest using to protect critical deer herd migration routes, winter range and fawning areas? Apparently no road density thresholds have been established! Because the Plumas National Forest Land & Resource Management Plan as amended requires only "bioregional-scale habitat and distribution population monitoring for mule deer" (page 20, Project Management Indicator Species Report) only obvious generalizations are made about the effect of this Travel Management project on this Management Indicator Species. This report states that data, from the California Department of Fish & Game, "indicate that mule deer continue to be present across the Sierra Nevada, and current data at the range-wide, California, and Sierra Nevada scales indicate that although there may be localized declines in some herds or Deer Assessment Units, the distribution of mule deer populations in the Sierra Nevada is stable." That is hardly reassuring about conditions on Plumas National Forest!

As I mentioned in my scoping letters and reflected in maps that I included with the Route Designation Feedback Forms that I previously submitted, allowing OHV use during the critical deer wintering season causes a significant disruption to the wintering deer population and really should be prohibited from November 1 to April 30. Additionally, roads may alter mule deer movement patterns. Preliminary studies by Sawyer et al., 2004, on the impacts of natural gas development in Wyoming, suggest that extensive road networks have affected mule deer distribution patterns. [[Sawyer, J., Nielson, R., McDonald, L., and Strickland, D. 2004. Sublette mule deer study (Phase II): long-term monitoring plan to assess potential impacts of energy development on mule deer in the Pinedale Aticline Project Area. Western Ecosystems Technology, Inc. Cheyenne, WY.]]

According to Bertram (1984), the effects of motorized routes on mule deer extend well beyond their physical footprint and the increased mortality resulting from road kill and poaching. [Bertram, R. 1984. North Kings Deer Herd Study. California Department of Fish and Game.] According to Lutz, et al. (2003), "roads can pressure mule deer into using less-preferred or lower-quality habitat and this could negatively affect an individual's energy balance "and ultimately decrease population productivity especially on winter range." [[Lutz, et al. 2003. Impacts and changes to mule deer habitat. Pages 13-61 in: de Vos, J.C. Jr., M.R. Conover and N.E. Headrick, Eds. Mule Deer Conservation: Issues and Management Strategies.. Jack H. Berryman Institute Press, Utah State University, Logan, Utah.]]

As you probably know, the ridgelines used by migratory deer were also used by prehistoric hunters of those deer, and over time many of those routes also became major mountain roads and flats where people found it easiest to build homes. Our migratory deer herds are subsequently now in decline. According to the Bucks Mountain / Mooretown Deer Herd Management Plan, "Road kill can cause a considerable loss. For both herds, a road kill exceeding 34% of the reported buck take is estimated."
Effects associated with roads also take a high toll. "From 1.5 to 6+ acres of habitat are destroyed for each mile (12 to 50+ feet wide) of road construction. Although the road mileage of the range is unknown, it is great enough to account for several thousand acres of land. Vehicular disturbance further reduces habitat utilization. Roads significantly compound the poaching problem by causing easy and widespread access to deer." [[Bucks Mountain / Mooretown Deer Herd Management Plan]]

In a presentation to the Butte County General Plan Citizens Advisory Council on 2/28/08, Fish & Game Biologist Henry Lomelli reported that the migratory deer herds are subject to poaching and being run over by the ever-increasing number of motor vehicles found in the mountain forest and foothill chaparral, especially along their ancient migration routes. It is not the resident herds eating ornamental yard bushes that are threatened. It is the herds that migrate up to 100 miles, twice a year, that are threatened by increased human presence. Critical deer herd winter range is generally on south and southwest facing slopes from 3000 feet in elevation down as low as 500 feet, especially where the land has not been subdivided into smaller parcels with scattered houses and prioritized fire suppression. Unfortunately the foothills are about 90% private property; and ideal deer habitat there is also favored as building sites. Mr. Lomelli told us that dogs allowed to run loose take a high toll on migratory deer. The Department of Fish & Game allows free-running dog packs to be shot. Stress from loose dogs chasing them is one of the top 3 factors causing increased deer mortality.
Shortening the hunting season would have little effect in preserving migratory deer herds because it is not the bucks that need protection. Current hunting restrictions leave plenty of bucks for breeding. The Forest Service has an opportunity on our large National Forests, not available on aggregate, smaller private parcels, to try to reverse the decline of migratory deer on its extensive lands. The cautionary principle should be followed and access restrictions applied, unless on a case-by-case basis vehicular access is shown to have no or easily-mitigated effect in specific locations.

In the Butte County General Plan 2030 Habitat Conservation Plan January 2009 draft document Conservation

Preserve Design Criteria for Planning Species, it recommends large patch sizes for managing black-tailed deer habitat. "Mule deer home ranges are large and variable in size (96 - 7,112 acres [[Kie et all 2002]]). Minimum patch size for purposes of managing this landscape should be correspondingly large. Preserved patches should be at least 300 acres and contiguous with other protected habitat areas to allow for unobstructed movement through the plan area. The location and configuration should be based on proximity to high resident deer use areas or known migratory routes."

After painstakingly examining maps provided my Fish & Game biologist Henry Lomelli showing where hunting tag data indicate deer migration routes are found, I was glad to see that no new roads or motorized trails were proposed along three of the major deer routes and winter range, those ridgelines now having the Oroville Quincy Highway, Lumpkin Road, and Forest Service Primary Route 94. I suggested two places on Plumas National Forest where a proposed increase in road and motorized trail density could conflict with preservation of deer herd migration routes.

It appears from the alternatives mapped, however, that along only one of those two ridge routes, Concow Road from Flea Mountain to Granite Ridge, was a user-created road, 4M02, dropped from the two alternatives, 4 & 5, that propose some new roads but less than the 364 miles of user-created routes proposed to be added to the system with Alternative 2, the proposed action. The fifth deer route I asked be considered, however, west of but roughly paralleling FSPR 28, still has many user-created OHV routes proposed with the preferred Alternative 5, though most of those routes would be open only May 1 through December 1. Perhaps in deference to hunters, that would still allow vehicular conflicts with migratory deer during the month of November. It appears that only with Alternative 4, emphasizing natural resource protection, and Alternative 3, that adds no new OHV routes, is the deer migration route, west FSPR 28 and roughly paralleling 22N83 from Hungry Hunt Peak to Coyote Gap, given consideration. Unfortunately, there are already more than 2 miles of NFTS roads per square mile within the 3 deer migration routes that appear to have been given consideration by having no new user-created roads proposed. All deer migration routes are thus important to the viability of our local herds.

Response

Road Density Thresholds - The Mule Deer section within the Terrestrial Wildlife Analysis was updated to show the cumulative effects of roads and road densities to deer herds within the Plumas NF. See Mule Deer section in the FEIS (Table 98, page 268). The threshold for road densities used in the FEIS was 2 miles/sq mi (see page 257). Road densities were used in the cumulative effects section for Mule Deer since the proposed action and alternatives will not add new roads or increase existing road densities to the NFTS.

Deer Winter Range – Effects to deer winter range were analyzed in the FEIS and considered on a route by route basis (Appendix A). Routes were dropped from Alternatives 4 and 5 due to winter range and critical winter range issues (routes dropped from consideration in critical winter range; 10M20B, 10M21C, 10M35 and 10M36A, routes dropped from winter range; 9M59A, 9M59C, 9M59D, and 9M59E). In addition, seasonal closures for hydrology (e.g. winter closures for Flea Mountain area Jan 1st to March 31st, French Creek Basin Jan 1st to April 30th) and aquatic species (e.g. French Creek watershed Oct 15th – May 1st) were also considered as benefits to Mule Deer winter ranges as well (see Appendix A). Sawyer et al. 2004 was considered, but was not considered applicable to the FEIS since extensive road networks related to oil & gas development are not comparable to the designation of routes the Forest considered in the FEIS.

Bertram (1984) and Lutz (2003) – The commenter cites these two studies in reference to deer avoiding routes and displacement of deer to less suitable habitat. In regards to Bertram, 1984, the Plumas NF analyzed the same effect (effects extend beyond the physical footprint of a motorized route) mentioned in the Bertram study by using a 200 meter zone of influence, however this distance was based on the Rost and Bailey (1979) study. In regards to Lutz (2003), the Plumas NF did consider the information in this publication as cited by the commenter; however the Plumas NF cited this publication correctly in the FEIS as deVos et al. 2003.

Bucks Mountain-Mooretown Deer Herd Management Plan – The commenter references loss of deer from road kill and loss of habitat from road construction. None of the alternatives in the FEIS propose road construction, and the loss of deer from road kill within the Bucks Mountain-Mooretown Deer Herds occur on state highways or paved roads. Neither of these roads types (state highways, paved roads) are proposed under the FEIS or its five alternatives.

The Forest has been in contact with Henry Lomelli (CDF&G unit biologist) in regards to the Bucks and Mooretown Deer Herd. The Plumas NF is currently in the process of finalizing a Challenge Cost Share Agreement with the Department of Fish & Game and Unit biologist Henry Lomelli for a deer herd study within the Deer herd units and Butte County. The study will look at deer movement and identify holding areas, fawning areas and opportunities to evaluate current and future management actions and direction on the Plumas NF.

The Butte County Plan is outside the scope of Forest Service management, however, the Forest, as noted above, does work with the CDF&G who manages the deer populations to ensure activities occurring on the Forest are compatible with Deer management objectives.

In regards to 4M02, the route was dropped, as cited by the commenter from Alternatives 4 and 5. This route was dropped due to watershed concerns and sediment discharge into the creek. However, dropping of the route for watershed concerns also benefits Deer in this case. Many additional routes that were dropped for other higher resource concerns also benefited wildlife as well. In regards to route 5M04 near Forest Route 28, and paralleling forest service road 22N83, this route is a motorcycle only route, which is at most 12” wide. The Plumas does not feel that this route type (motorcycle) will affect deer migration across Hungary Hunt Peak ridge. Road affecting deer migration are typically state highways due to their width, vehicle speed and placement of jersey barriers.

Comment 7

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Allow Fewer Motorized Routes Where TE&S Species Need Habitat Connectivity

Of course, deer aren't the only species adversely affected by a high density of roads. According to page 5 of the Plumas National Forest Travel Management project Biological Evaluation / Biological Assessment for Terrestrial Species, "Wildlife often avoid habitats in the vicinity of roads because of repeated disturbances along the corridor (Jalkotzy, et al. 1997)." "Havlick (2002) documented numerous studies that show that wildlife, including birds, reptiles, and large ungulants, respond to disturbance with accelerated heart rate and metabolic function, and suffer from increased levels of stress. These factors can lead to displacement, mortality, and reproductive failure. Wildlife was also reported to avoid areas with high levels of disturbance." That definitely includes disturbance by noise. "Effects of noise can cause physiological responses in wildlife including increased heart rate and altering metabolism and hormone balance." Behavior responses can include escape behavior. "Together these effects potentially can lead to bodily injury, energy loss, decrease in food intake, habitat avoidance and abandonment, and reproductive loss." [[BE/BA p.5]]

According to Joslin & Youmans (1999), OHV use has been shown to cause stress in many animal species and often results in major changes in animal behavior and reduced reproductive success or survival. [[Joslin G. and H. Youmans. 1999. Effects of recreation on Rocky Mountain wildlife: a review for Montana. Committee on Effects of Recreation on Wildlife, Montana Chapter of the Wildlife Society]]
The cautionary principle should dictate that OHV routes should not be designated where "take" of an endangered or threatened species is likely to occur. In addition, OHV routes should not be designated in ESA designated critical habitat for threatened or endangered species, either terrestrial or aquatic. The Endangered Species Act (ESA) makes it unlawful for any person to "take" a listed species. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct" and includes "significant habitat modification or degradation that kills or injures wildlife by impairing essential behavioral patterns, including breeding, feeding, or sheltering." [[16 U.S.C. 1532]]

Page 169 of the DEIS (and page 15 of the BE/BA) states that, "Motorized routes have a Zone of Influence within which habitat effectiveness or suitability is reduced and wildlife population densities are lower (Trombulak and Frissell 2000, Gaines et al., 2003). The effects to wildlife extend beyond the immediate road prism itself, into what can be referred to as a Zone of Influence adjacent to motorized roads and trails. The degree of effect of the various factors associated with roads and trails can be evaluated more effectively when considering the amount of a given species habitat that occurs within this Zone of Influence of motorized routes. Wildlife species behaviors and habitats are modified within various distances from motorized routes. The distances of the Zone of Influence for individual species that are used in the analysis of effects are based upon the best available science in the literature."

In the DEIS (Table 7 on page 25) you compare each alternative using a 200 meter (approximately one-eighth mile) Zone of Influence on species associated with late-successional forest, then, assuming all types of motorized routes have the same negative effect, state that the no-action Alternative 1 would have by far the most impact, on 126,276 acres of late-successional forest habitat, as compared to Alternative 3 which would add 364 miles of user-created routes (because under Alternative 1 cross-country, off-road motorized travel would continue). However, you are not allowed to choose Alternative 1; and the number of illegal routes that might be created under that alternative is merely a guess. The only meaningful comparison in Table 7 is between the other alternatives, with 0 new acres of impact on late successional habitat under Alternative 3, which adds no new miles of routes; 38,431 acres with 364 miles added in Alternative 3; 27,451 acres from adding 251 miles with the preferred Alternative 5; and 16,741 acres from adding 141 miles with the natural resource protection emphasis Alternative 4. Thus, even your alternative that supposedly reflects the better natural resource protection would see a very significant reduction in late successional forest habitat utilization.

I confirmed this while comparing the DEIS alternatives maps with maps (that you thoughtfully provided me) of the Plumas NF Draft Carnivore Network previously managed to sustain habitat connectivity for American marten, a Sensitive species associated with late successional forest. That comparison shows that, even with Alternative 4, both hot spots, where new OHV routes are densest and an enlargement of those Granite Basin and La Porte Area hotspots is shown, are located in the middle of carnivore network corridors, the West corridor and the South corridor respectively! The whole Draft Carnivore Network is already highly fragmented by system roads; and between larger blocks of late successional habitat, many of the connecting corridors are already quite narrow and thus probably unlikely to be utilized by marten.

Response

The Draft Carnivore Network on the Plumas NF is not a land designation, but an evaluation tool used to determine and disclose impacts to habitat connectivity. Tables 76 and 77 disclose the impacts to habitat connectivity based on the acres of habitat affected within the Draft network. The idea that the Draft Carnivore Network is already highly fragmented by system roads is an interesting point of view by the commenter, since the Draft Carnivore Network when established by the Plumas in 1996 considered and factored in the existing road system at the time the network was established, including the West and South corridors. In addition, the Granite Basin and LaPorte areas

do not have marten occupying those areas. Based on the Zielinski et al. 2008 study, their results indicated that the level of OHV use witnessed did not affect occupancy and, therefore, did not appear to be contributing to fragmentation. The Plumas NF expects this to be the case with routes on Forest, due to route widths and the low level of use currently experienced on the Forest.

Comment 8

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Expand the Carnivore Network Connections to Late Successional Habitat by Reducing Road Density

This year, the Sierra Club has endorsed a Resilient Habitats Initiative to help wildlife adapt to a changing environment by protecting critical habitat and creating corridors that will allow for migration as temperatures rise. This would require the creation of interconnected networks of large protected areas and corridors where non-climate stresses such as habitat fragmentation would be limited. The Sierra Club's other guidelines regarding Off Highway Vehicle use include considering environmental impact and user interference, analyzing whether allowing motorized routes are appropriate for the overall area, closing all but one of several closely parallel routes, and where possible choosing route boundaries that are naturally self-enforcing. I suggest that, at the least, in steep-walled canyons, where only the most experienced 4-wheel-drivers dare to drive, you should strictly enforce Vehicle Restricted Area prohibitions against off-road travel, or completely close those areas to vehicles until site-specific management plans are implemented. This process should include ongoing analysis as to the effectiveness of any attempted mitigations as well as methods of closure.
The BE / BA for this DEIS states (p. 30) that because detailed analysis would be difficult and complex, and data is lacking in the amount of use received by all the routes within Plumas National Forest, all motorized routes are treated equally. I submit that detailed analysis must be done in areas where we hope to allow better habitat connectivity, especially for shy species like the American marten.

Response

The Draft PNF Carnivore Network was developed in 1996 as a tool to evaluate habitat connectivity at the project scale. The Draft Network was not developed to be modified or expanded based on a project by project analysis, nor is it a land designation under the Forest Plan or its subsequent amendments. Habitat connectivity for wide ranging carnivores is addressed in FEIS in relation to the proposed action and its alternatives (2-5). Analysis for the Marten is provided in the FEIS. Effects to the Marten were disclosed by Alternative, where Alternative 3 presented the least risk to habitat connectivity and the Marten, and Alternative 1 presented the highest risk. Along this scale, Alternatives 4, 5 and 2 fell between Alternatives 3 and 1 respectively. Detailed analysis of route specific data (amount of use) is not feasible, nor needed. The level of detail requested by the commenter was not needed in this analysis, since the majority of the routes evaluated were 50" or less in width. This width does not provide high risk for marten or habitat connectivity. The Marten and habitat connectivity are at high risk as a result of paved roads and highways that are wider and provide for higher vehicle speeds. When analyzing effects to habitat connectivity and maintenance of linkages and corridors, researchers currently working for the Forest Service focus on roads that are maintenance level 3 and above. All routes evaluated in the EIS fall below the level 3 road maintenance category.

Comment 9

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Enhance Old Growth Forest Habitat Value By Expanding Vehicle Prohibited Areas

So as to better protect late successional forest habitat, and also to minimize conflict between motorized and non-motorized human users, larger areas of late successional forest habitat should be managed to encourage use by the species needing that habitat, by reducing road density, not increasing it.

Perhaps not coincidentally, the non-motorized Pacific Crest National Scenic Trail follows some of the Draft Carnivore Networks on our National Forests and connects many Vehicle Prohibited Areas, Wilderness Areas, Roadless areas, and other late successional forest habitat areas such as Spotted Owl Habitat Areas and Protected Activity Centers for spotted owls and the goshawk. Roadless areas tend to become refuges for human-shy wildlife. Were non-motorized networks expanded to allow better late successional habitat connectivity, which would also give hikers and equestrians more areas to enjoy quiet recreation in majestic surroundings? Such wider distribution of the solitude-seeking hikers and equestrians would thus also enhance an area's desirability by human-shy wildlife.

Response

All the action alternatives (2-5) significantly reduce impacts to late successional forest habitat. Impacts to other species that utilize Old Forest Habitat are disclosed in the FEIS. The expansion of Vehicle Prohibited Areas was not analyzed in FEIS, since it was not included as an action item in the alternatives. Significant portions of late successional forest habitat already fall under protected land designations (i.e. SOHA, Spotted Owl PACs, Off-based and deferred, LSOG) under the Herger Feinstein Quincy Library Group program, making the expansion of vehicle prohibited areas unnecessary for the protection of late successional forest habitat.

Comment 10

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Enhance Old Growth Forest Habitat Value By Expanding Vehicle Prohibited Areas
In the BE/BA for this project all TE&S species are expected to benefit where road density is lower. Page 22 cites Gaines et al. (2003) as conducting "a literature review where 71 late-successional forest associated wildlife species were identified that were negatively impacted by a variety of road and trail-associated factors. These impacts include habitat loss and fragmentation, road avoidance or displacement, harassment, and others.... In addition, studies have shown that species within this group are sensitive to disturbance." Four California Wildlife Habitat Relationship types and six vegetation types are identified as important for late-successional / old forest associated species, generally stands of trees with diameters at breast height (dbh) equal to or greater than 11", with greater than 40% canopy cover.

I'm going to quote some more of your own document back to you, here, because I think it needs emphasis: "In addition, the Sierra Nevada Forest Plan Amendment provides broad management direction for Old Forest Emphasis Areas where they are 'managed to maintain or develop old forest habitat in areas containing the best remaining large blocks or landscape concentrations of old forest and areas that provide old forest functions (such as connectivity of habitat over a range of elevations) to allow migration of wide-ranging old-forest-associated species.' "[Public Wheeled Motorized Travel Management Biological Evaluation / Biological Assessment - June 2008, p.22]

Though many of those species have partially nocturnal habits that would not be as disturbed because OHVs aren't usually operated at night, those same species do hunt during daylight hours as well, especially if their prey choice is active during daylight. I have seen a marten capture a chipmunk during mid-day on the banks of Soda Creek, where few humans are found because of the lack of roads into that canyon. The marten was so intent on capturing the chipmunk it didn't hear nor see us coming. Our presence instead helped the marten capture its prey by startling and distracting the chipmunk momentarily. The chipmunk might even have been drawn to the vicinity of the hiking-and-equestrian trail we were on by the scent associated with dropped trail mix and other campsite edibles. If we had been operating noisy vehicles or equipment, however, the marten would likely have heard us coming and avoided that area, where a human-accustomed chipmunk might still have sought refuge. Perhaps whether specific marten adopt a nocturnal habit depends upon when the most abundant prey species usually forage. According to Wikipedia, marten are most active at night, early morning, and late afternoon.

The fact that collisions with vehicles are a known source of mortality of spotted owls (BE/ BA p. 30) would seem to indicate that California Spotted Owls are not exclusively nocturnal, either. That in turn means that owl mortality from hunting is likely to be higher, too, as hunters don't generally hunt after dark.
A very significant additional effect of road and trails is that these more-open-canopy, early-seral-vegetation road and motorized trail corridors provide access for predator competitors that would not otherwise be found. Hawks, for example, are more accustomed to hunting in forest openings.

Response

The Plumas NF is not planning any routes in Soda Creek. Please consult the Lassen NF for routes in the Soda Creek area.

The commenter is correct in that Spotted Owls are not exclusively nocturnal. Spotted owls are partially active during the daytime, especially during the breeding season.

Comments regarding hunting are unfounded and not supported by published literature or fact.

Comment 11

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Since the Forest Service considers noisy human activities greater than one-quarter mile from spotted owl nest sites to have little potential to affect spotted owl nesting (BE / BA p.30), I assume that within a quarter mile of such nest sites no system roads are constructed and no user-created vehicle routes will be allowed to remain. I worry that some hunters would purposely shoot spotted owls and other old-growth-associated species in the hope that if exterminated; those species would no longer exist as a reason to exclude vehicles. I think the Forest Service is wise not to label, on your widely distributed use maps, why some areas are administratively withdrawn from vehicle entry.

Response

The 0.25 mile buffer distance for evaluating impacts to owl activity centers was used to determine effects and to disclose those effects to the public. The 0.25 mi distance was not used as criteria to eliminate routes or roads that fell within that distance from activity centers.

Comments regarding hunters are unfounded and not supported by published literature or fact.

Comment 12

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Increase the Likelihood of Marten Migration Between Large Blocks of Old Growth with Low Road Density

Since marten are highly territorial within about a 2-square mile range, very large blocks of connecting habitat would be needed to allow genetic dispersal. Young marten normally disperse out of their home territory in late summer or early fall to establish their own territories. In American Marten Recovery Plans, the Forest Service in Wisconsin has adopted a self-sustaining population goal of 300 marten. [[Excerpt from The Endangered & Threatened Vertebrate Species of Wisconsin, from the website of the Wisconsin Dept. of Natural Resources, http://www.dnr.state.wi.us /org/land/er/factsheets/mammals/Marten.htm]]
Animal Diversity Web [[http://animaldiversity.ummz.umich.edu/site/accounts/information/Martes_americana.html]] reports that American marten tend to be found in structurally complex, mature forests, and can occur at all elevations where such habitat exists. "They hunt most at dawn and dusk when prey animals are most active." Though somewhat arboreal, "they do most of their hunting on the ground."

Response

Thank you for the comments regarding Marten in Wisconsin. Based on our knowledge of Marten on the Plumas NF, Martern occur in different forest types from Red fir to more open rocky subalpine forest habitat. Marten have been surveyed for across the Plumas for the last decade with over 2,000 survey stations. To date Marten have been found in a limited area within the Lakes Basin area on the Beckwourth Ranger District. Currently the Plumas NF is providing suitable habitat for Marten across the forest.

Comment 13

Action: Mitigation/BMPs

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Consider Designating Wider Vehicle Prohibited Areas Along Plausible Marten Travel Routes

In examining National Forest maps for areas where road density is low and there are large areas of late successional forest habitat in relatively close proximity, a plausible migration route for marten becomes evident, that could possibly allow marten from the Soda Creek Research Natural Area on Lassen National Forest to find their way to and from the Lakes Basin in Plumas NF, where marten are still relatively numerous. I will here list that plausible marten travel route, from west to east and north to south, starting at the Lassen / Plumas National Forest boundary northwest of Belden and following sections of the Draft Carnivore Network:

1) The Vehicle Restricted Area from the Lassen NF boundary northwest of Belden, down to Hwy 70 and the North Fork Feather River is the first portion of that route. It includes the Chips Creek canyon, traversed by the Pacific Crest Trail, the eastern portion of the high Lakes Semi-Primitive Non-Motorized area at the NW summit of the North Fork Feather River canyon, and extends northward to Yellow Creek, through the RARE II inventoried Chips Creek Roadless Area on Lassen NF.
Thank you for dropping from all alternatives 6M43 as a motorized trail. That Indian Springs trail has served as the alternate Pacific Crest Trail route when Chips Creek Canyon was closed to slides, is smack in the middle of the

Northwest Unit of the Carnivore Network connection between National Forests, and would have bisected the Chips Creek Roadless Area on Lassen NF and the Vehicle Restricted Area on Plumas NF. Motorized vehicles should not be allowed on 6M43 just because some outlaw OHV users with chain saws have diminished Soda Ridge's desirability as marten habitat. I read a first-hand account of motorcyclists illegally using the Pacific Crest Trail admitting they use 6M43 as part of their loop, which probably causes serious erosion down that very steep Indian Springs Trail in unstable granitic soil, and greatly disturbs wildlife that take refuge in that otherwise non-motorized Chips Creek canyon.

2) Assuming of course that marten can find their way across Highway 70 and the North Fork Feather River, that Northwest Unit of the Carnivore Network on Plumas NF continues up the southeast side of the North Fork Feather River canyon within the Bucks Lake Wilderness. It passes through the Bucks Lake Wilderness, then crosses the Oroville Quincy Hwy and Big Creek Road near Bucks lake, and narrows as it continues south-southeast down into the Middle Fork Feather River Canyon, in the Vehicle Restricted Area between the Pacific Crest Trail and the lower half of Bear Creek. Proposed new motorized routes 8M02, 8M03, and 8M04 should not be added to the NFTS, as they are within that Northwest Unit of the Carnivore Network where it begins to narrow and would thus already be difficult for marten to find.
System roads in that Carnivore Network narrowing, that should also be considered for closure with this project, include 23N06X and its spurs, and also 23N74YA, 23N19G, and 23N19I because of their proximity to the Pacific Crest Trail.

3) From the narrow Middle Fork Feather River Wild & Scenic corridor, the Draft Carnivore Network maps show two possible routes for marten migration, up along the Middle Fork Network Unit, or south within the initially wider South Network Unit. The latter includes the Pacific Crest Trail to Section 16, T22N, R9E, a partially private and partially state-owned parcel, then goes south to Little Grass Valley Reservoir. For that corridor to be more favorable to marten, proposed new route 9M24 should not be allowed, and system roads 23N65YB and 22N56, adjacent to the PCT, should be considered for closure, as well as 22N27 and 22N61.
From Little Grass Valley Reservoir the Draft Carnivore Network (DCN) appears to follow the South Fork Feather River upstream despite the presence of adjacent system roads 22N68 and 22N60 on both sides of and crossing the river and 22N88X crossing the river. Perhaps the entire 22N60 road should be considered for closure since it then goes north and then east adjacent to and crossing the PCT until it meets Hwy 120. Hwy 120 already crosses that DCN South Unit route.
From the Hwy 120 crossing, the DCN South Unit route appears to go east until crossing 23N10. The PCT leaves that marten route just east of Hwy 120, then goes generally southeast to Stafford Mountain, after which it enters the Vehicle Restricted Area adjacent to the Tahoe NF boundary. A wider DCN South Unit corridor is needed in that area between where its more northern branch is now shown and the DCN South Unit that runs north / south just east of 23N10. Perhaps proposed road 10M07, also just east of 23N10, should not be allowed and some of the system roads connecting to 10M07 should be considered for closure.
Further south in that south-trending DCN South Unit corridor, ATV roads 10M50, A, B, & C, connecting 10M07 to the PCT at Stafford Mountain, should also be considered for closure. Why is there a fork in the DCN South Unit just north of the fork in Nelson and East Nelson Creek, before that Unit joins again further south? According to the map you sent showing both the DCN and Old Forest Emphasis Areas, there is late successional forest between those forks of the DCN South Unit; and according to the DEIS Alternative maps there are not many roads there. Perhaps more system roads between those forks should be considered for closure, including 22N70 and 22N41 along Nelson Creek, and 22N16 along East Nelson Creek, that connects to 10M08.

4) You should also drop all motorized routes into the Wild & Scenic corridor of the Middle Fork Feather River, especially 8M07, Deadman Springs Trail, in T23N, R8E, Section 35, which is part of the Pacific Crest Trail and in the middle of the Carnivore Network connection all the way up the Middle Fork Feather River canyon. Other motorized routes into the Middle Fork Feather River canyon Wild & Scenic corridor include 8M05, 9M31, and 10M17, which were also not authorized in the 1970 Wild & Scenic River Management Plan and should also be closed.

5) From the eastern end of the Middle Fork Feather River Wild & Scenic corridor, the DCN South Unit has an arm that appears to start at the mouth of Nelson Creek, and then follows Nelson Creek and East Nelson Creek toward the DCN Plumas Eureka State Park Unit. Existing motorcycle trail 10M08, following East Nelson Creek, should be closed to vehicles so as to encourage use of that narrow riparian corridor by marten.

6) East of Plumas Eureka SP (and the DCN PESP Unit) there are already too many system roads within the DCN South Unit where it widens into the Vehicle Restricted Area adjacent to the Tahoe NF boundary. 11M02 should not be allowed to further fragment that marten habitat. Southeast of PESP, system road 22N08 and motorized trail 11M01 into the Lakes Basin, along the Tahoe NF boundary, should also be considered for closure. Further southeast, just southwest of Gold Lake, motorized trail 12M01 from Gold Lake to the PCT should also be considered for closure; and its continuance, proposed route 12M02, adjacent to the PCT and where marten have been sighted, should not be allowed. As you know, the most marten on Plumas NF currently live in the Lakes Basin. We want to protect existing marten habitat, as well as enable their migration for genetic renewal with marten populations elsewhere.

Response

The Plumas NF appreciates your comments on its Draft Carnivore Network. Alternatives 3 and 4 best address the needs of the Marten, while alternative 5 minimizes effects to habitat fragmentation based on use of the Draft Network analysis tool. Existing Forest Service roads that were in place in 1996 were factored into the development of the Draft Network, therefore the roads you mention were analyzed as part of the existing condition for the Draft Network. The proposed "plausible marten travel route" listed by the commentor has been reviewed and consider by the Plumas NF. However, one large piece of the landscape prevents the plausible marten travel route from functioning properly and therefore makes the route outlined by the commentor unfeasible as a viable route. The large landscape piece that makes this route unfeasible is the 2000 Storrie fire. The 2000 Storrie fire has left a large piece of habitat unusable by the marten and created a void in habitat connectivity between the Lassen and Plumas. This void in habitat connectivity created by the 2000 Storrie fire has been evaluated and considered in our existing

Draft Network.

Comment 14

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Close System Roads and Motorized Trails Into the Wild Middle Fork Feather River Canyon

The narrow corridor of the Middle Fork Feather River canyon is a key component of the Draft Carnivore Network on Plumas National Forest, where even existing motorized trails should be closed to motorized vehicles. I would like to incorporate by reference the letter submitted by Friends Of the River. I am including some of the highlights of their letter here in quotations.

"The Middle Fork Feather Wild & Scenic River was designated by Congress when it passed the National Wild & Scenic Rivers Act (NWSRA), which established the National Wild & Scenic Rivers System in 1968." "In 1970, the Plumas National Forest (PNF) released the Middle Fork Feather Wild & Scenic River Plan, as required by section 3(d)(1) of NWSRA." "In the River Plan, a 27.5 mile segment of the Middle Fork from its confluence with Nelson Creek downstream to Milsap Bar was designated a Wild River. All the motorized routes identified in the TMP are located in this Wild segment." Federal guidelines for Wild & Scenic Rivers were adopted in 1982 by the USDI & USDA requiring that, "Wild river areas will not contain roads, railroads, or other provisions for vehicular travel within the river area." Thus, all roads down into the Middle Fork Feather River canyon should be analyzed for closure; and the Travel Management Process is an appropriate venue to do that.

Response

The responsible official, at the start of the project, determined a purpose and need for the project to implement subpart B of TMR through the prohibition. As a result of this action they also determined a need to take actions to address access and motorized recreation opportunities that would otherwise be limited through the prohibitiion. Existing system motorized trails and roads were not analyzed in this effort.

Comment 15

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Preserve As Much Roadless Area As Possible

As I mentioned in my plausible expanded-carnivore-network-route item (1) above, I applaud your executive closure of the Indian Springs Trail to motorcycles. The Chips Creek Roadless area it would otherwise bisect is vital habitat for many forest species, as are most roadless areas. According to comments provided by The Wilderness Society, however, you are proposing to designate at least 10 National Forest Transportation System (NFTS) roads in agency inventoried roadless areas, 20 NFTS roads in citizen-inventoried roadless areas, and 35 new unauthorized roads in citizen-inventoried roadless areas. I agree with TWS that, "To allow OHV use in these areas would cause disproportionate conflict between quiet recreationists and OHV users and will risk precluding roadless areas from further consideration for Wilderness designation." It would also tend to degrade habitat for forest species.

Response

No proposed motorized trails are within inventoried roadless areas and Alternative 4 drops routes within citizen inventoried roadless areas. The travel management regulations are comprised of three parts: Subpart A, Administration of the Forest Transportation System; Subpart B, Designation of Roads, Trails, and Areas for Motor Vehicle Use; and Subpart C, Use by Over-Snow Vehicles. Subpart A of the travel management regulations includes the provision referred to in this comment. The focus of this action is implementation of Subpart B, which requires the Forest Service to prohibit cross-country motor vehicle travel and designate a system of roads, trails, and areas for motor vehicle use. Subpart B of the travel management regulations was specifically developed to address the growing popularity and capabilities of OHVs and the effects of unmanaged OHV use on forest resources. The Forest Service recognized that "the magnitude and intensity of motor vehicle use have increased to the point that the intent of E.O. 11644 and E.O. 11989 cannot be met while still allowing unrestricted cross-country travel." 70 Fed. Reg. 68264, 68265 (Nov. 9, 2005). The Forest Service developed the current action and alternatives to respond to this new direction. Implementation of Subpart B will have immediate, on-the-ground effects, which are the subject of the analysis contained in this FEIS.

Comment 16

Action: Court decisions (past or pending)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Preserve As Much Roadless Area As Possible
TWS found that the Plumas NF Travel Management DEIS proposes to designate approximately 16 National Forest Transportation System maintenance level 2 roads within Semi-Primitive Non-Motorized areas (with Alternatives 2 and 5). The Plumas National Forest Land and Resource Management Plan (LRMP) states that the Semi-Primitive Non-Motorized (SPNM) prescription "applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation." I suggest you may need to better examine opportunities to preserve all roadless areas. According to the court decision in Center for Sierra Nevada Conservation v. Berry (E.D. Calif. Feb. 15, 2005), "Executive Order 11644 created a policy striking a balance in favor of resource protection." The mandate of Executive Order 11644 applies both to the existing travel system and any new designation.

Response

There are no new trails proposed in Semi-Primitive Non-Motorized (SPNM) areas on the Plumas National Forest.

Comment 17

Action: Classification

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Consider Road-Associated Vegetation Management While Designating Vehicle Routes

Since good marten habitat contains many large standing and fallen snags, rather than removing such hazard-trees adjacent to roads to make those roads safer for humans, close more roads through stands of large trees and discouraged human entry. Allow snag density to greatly increase. After posting them closed, allow large snags to fall across redundant roads within late successional forest habitat, thus further discouraging motorized use and providing more winter travel and hunting pathways for marten. Vegetation management should be considered as part of this process of travel management, especially because roads are the location of shaded fuel-breaks being cut to provide safer access by fire suppression personnel. Such DFPZs at least temporarily alter habitat suitability for species associated with old growth forest by expanding the width of early-seral-stage openings. That road-associated vegetation management is a major reason why many Forest roads disrupt habitat connectivity for marten and other old growth associated species. Not all roads are suitable locations for DFPZs or hazard-tree removal, even though that vegetation management makes safer the use of those roads by humans.

Response

Snag removal and/or hazard tree removal are not actions proposed under any of the five alternatives analyzed in the FEIS. Individual gegetation management actions, such as DFPZ's, are considered and analyzed under seperate NEPA documents. Proposed and Future DFPZ's are considered under cumulative effects and are listed in Appendix C under vegetation management projects.

Comment 18

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Other (SEE RESPONSE)

Hydrologically Decommission More Roads Where They Alter Meadow Hydrology

Where site-specific analysis suggests a lower road density would enhance habitat connectivity for marten, some system roads should not only be closed but also hydrologically decommissioned. As you know, roads alter meadow hydrology and vegetation and can have a negative effect on marten prey abundance. Imagine how much better a chance for survival such old-growth-associated species would have if not just unauthorized routes but all roads within their forest home were analyzed for closure and decommissioning!

Response

Road Decommissioning is a sperate action that was not analyzed under this project. Road decommissioning often occurs during the implementation of HFQLG Vegetation Management Projects and does contribute to reduced road densities on the PNF. As more HFQLG Vegetation Management Projects are implemented, more opportunities are available for road decommissioning and reducing road densities.

Comment 19

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Manage the Pacific Crest Trail For Marten, As Well As For Quiet Recreation

The most common management prescriptions adjacent to the Pacific Crest Trail are ones where human-caused changes to the forest are barely noticeable. Allowing roads to closely follow and cross the PCT does not meet that prescription, instead encouraging illegal vehicular use of that trail. As shown when, at a Travel Management meeting in Oroville, I asked an avid motorcyclist if he'd even been able to drive down into the Middle Fork Feather River canyon and he claimed the Pacific Crest Trail as a driveable route, it is not always now obvious, either on Forest user maps or on the ground, where that trail is closed to vehicles. That is another good reason not to allow vehicle routes into Vehicle Restricted Areas. Since, with this Travel Management process, most of the Forest becomes vehicle restricted; those areas should be re-designated as Vehicle Prohibited Areas.

I reiterate that the Pacific Crest National Scenic Trail connects many types of roadless areas which are refuges for many species besides humans. That very long non-motorized trail could be managed for better wildlife habitat connectivity, as well as for quiet recreation, if many unnecessary systems roads adjacent to or crossing that trail were closed. I suggest that the prescription for such an expanded network of Vehicle Prohibited Areas should resemble Wilderness in that even the noise of a motorized device of any sort would alert law-abiding citizens to notify Forest Service officials that illegal routes are again being cut and /or driven into critical wildlife habitat.

Response

Alternative 4 was developed to address concerns with routes in the Citizen-inventoried Roadless Areas. There are no proposed trails in the CIRA. This alternative also drops all routes in the Jacks Critical Aquatic Refuge, the CIRA as well as all routes that have been determined by resource specialists to have high to extreme effects on natural resources, see Appendix A of the FEIS. Additionally, Alternative 3 adds no proposed trails to the NFTS.

Letter 243

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	Request for full hard copy of Planning Document

Comment 1

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

EPA supports the Forest Service's decision not to select Alternative 2 Proposed Action as the preferred alternative.

Comment 2

Action: Classification

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

While we [U.S. EPA Region IX] acknowledge the benefits of the Alternative 5 Preferred Alternative, we have rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions") due to our concerns regarding the scope of the travel management planning process, and the designation of the Sly Creek open area and various routes associated with existing significant soil and water resource impairment, or located in Critical Aquatic Refuges or serpentine soils. Additional information is also necessary to fully describe seasonal closures, monitoring, and enforcement commitments.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Additional information has been added to the "Soil and water monitoring" section of chapter 2.

Comment 3

Action: Alternatives General (add, change, delete)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

We [U.S. EPA Region IX] urge consideration of an alternative which does not include the Sly Creek open area, with its significant existing adverse water resource effects, nor designation of routes located in Critical Aquatic Refuges or serpentine soils. We recommend elimination of routes with existing soil and water resource impairment located in watersheds with a high risk of cumulative watershed effects or that exceed the 4.0 mile per square mile road density threshold.

Response

Serpentine soils can produce asbestos dust that may cause health concerns. Table 15 of the FEIS depicts the number of miles of trails proposed to be added to the NFTS that traverse serpentine soils and the total miles of serpentine soils traversed by those trails for each alternative. Five trails (5M11, 5M13, 8M11, 8M23 and 8M32) are entirely in serpentine soils. The presence of asbestos in serpentine soils and health risks to trail users has not been determined. The Pacific Southwest Region is developing guidelines for determining the presence of asbestos and the health risks to the public. The Plumas NF will follow the guidelines when they are available and implement mitigation measures required by the Region if health risks are found to be present. Potential mitigation measures are anticipated to include public notice of asbestos hazards, closure of portions of trails to the public, and seasonal closure of portions of trails to the public.

Mitigations for soil and water impacts at the proposed Sly Creek area (described in Appendix F of the Soil and Water Resource Report) would ameliorate adverse effects. PNF watershed staff recommends that this area not be open to motorized traffic until these mitigations are in place.

Comment 4

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

We [U.S. EPA Region IX] acknowledge the constraints of funding and resources; nevertheless, we had hoped the Forest Service would take this opportunity to review and rationalize the NFTS, pursuant to Travel Management Rule direction to identify the minimum road system needed (36 CFR Part 212 Subpart A); to address known road-related resource impairments and use conflicts of both the existing NFTS and unauthorized user-created system; and to align the transportation system with maintenance and enforcement capabilities. We note a similar request has been made by Senator Feinstein (see attached letter).

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 5

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Water Resources

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Route designations are only part of what is needed to reduce the ongoing adverse impacts to water quality and other resources from the NFTS. We continue to believe a more holistic approach to travel management planning, whereby route designations are guided by travel analysis, known locations of resource impairment, and prior determination of the minimum road system needed, would better serve the long-term interests of the public, Forest Service, and National Forest resources.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 6

Action: Scope/Scale of analysis

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Scope of the Alternatives Analysis
Provide information on the minimum Forest road system needed and how this information was used to formulate the alternatives. The scope of this action includes prohibition of motorized vehicle travel off designated routes, the addition of unauthorized user-created roads and trails to the National Forest Transportation System (NFTS) so they may be designated for motor vehicle use, and changes to vehicle class and season of use. The draft environmental impact statement (DEIS) also states that unauthorized routes not included in this proposal are not precluded from future consideration for addition to the NFTS and inclusion on the Motor Vehicle Use Map (MVUM) (p. 3). We [U.S. EPA Region IX] believe a holistic approach to travel management planning, whereby route designations are guided by travel analysis, known locations of resource impairment, and prior determination of the minimum road system needed, would best serve the long-term interests of the public, Forest Service, and National Forest resources.

Recommendations:
The final environmental impact statement (FEIS) should describe the information that was used to formulate the motorized travel management alternatives, and their relationship to the requirement to identify the minimum road system needed for safe and efficient travel and administration of National Forest System lands (36 CFR Part 212 Subpart A, Section 212.5(b)). The FEIS should describe how the minimum road system needed will be identified pursuant to the requirements of the Travel Management Rule (36 CFR Part 212 Subpart A).

The FEIS should describe the factors that would be used in the consideration of future additions of unauthorized routes. We recommend that such factors include travel analysis and identification of the minimum road system needed.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1).

Alternative 3 responds to non-motorized recreation interest in “Citizen Inventoried Roadless Areas (CIRAs)” proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 7

Action: Scope/Scale of analysis

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Expand the scope of the action to include current roads and trails with known impacts.
The current estimate of annual deferred road maintenance is approximately $469,215.00 for the Plumas National Forest (Forest) (p. 53). EPA is concerned with the Forest Service’s ability to adequately address known road-related resource impairments, given the acknowledged lack of maintenance funds and this proposal to add to the NFTS additional miles of roads and trails known to contribute to soil and water resource impairment.

Recommendation:
We [U.S. EPA Region IX] recommend the Forest expand the scope of this action to consider, for seasonal or permanent closure to public motorized use, current NFTS roads and trails with known resource impacts.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation. The cost to implement the action alternatives would be covered by appropriated dollars as well as from volunteer labor and grants for any additional trail maintenance.

Comment 8

Action: Alternatives General (add, change, delete)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Water Resource Concerns
Select a preferred alternative which avoids and minimizes adverse effects to water resources, air quality, threatened, endangered, and sensitive species and their habitat, and human health. Forest watershed staff performed field surveys of every existing, unauthorized route proposed for addition to the current NFTS (p. 69). Based upon these field surveys, proposed trails were given a rating of Low, High or Extreme regarding the potential for soil and water resource effects. Alternative 2 Proposed Action proposes designation of 137 miles of existing, unauthorized routes rated as Extreme (85 miles) or High (52 miles) for soil and water resource effects. Routes rated Extreme for soil and water effects are those routes with current adverse effects where mitigation of these effects is not economically feasible, would not meet safety standards, or would not be effective due to physical constraints (p. 89). Alternative 2 would also include 126 stream crossings observed to either be currently diverting stream flow down the route surface or having the potential to divert stream flow (p. 88).

Recommendation: EPA supports the Forest Service decision not to select Alternative 2 Proposed Action as the preferred alternative. We [U.S. EPA Region IX] support selection of an alternative which avoids and minimizes adverse effects to water resources, air quality, threatened, endangered, and sensitive species and their habitat, and human health.

Response

The preferred alternative, Alternative 5, meets the criteria set forth in the comment. Alternative 5 dropped all routes with an "Extreme" rating, and those routes with a "High" rating will not be added to the MVUM until the mitigations are addressed.

Comment 9

Action: Classification

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Avoid designation of routes with existing resource impairments in watersheds with high risk of cumulative watershed effects or over-threshold road densities. Routes determined to have a High or Low soil and water resource effect would be designated as part of the NFTS under Alternative 5 the Preferred Alternative (p.101). These routes would not be legal for motorized use until identified critical mitigations are in place and proper installation is verified by Forest staff (p. 69). EPA is concerned with the designation of existing, unauthorized trails known to have soil and water resource impairment requiring mitigation, especially given the challenge of enforcing motorized use across a vast landscape and the backlog of maintenance needs.

Recommendation:
We [U.S. EPA Region IX] recommend elimination of routes with existing resource impairments that are located in watersheds with a high risk of cumulative watershed effects or that exceed the 4.0 mile per square mile road density threshold.

Response

Routes that require mitigation will not show on the MVUM until after the mitigation is complete.

Comment 10

Action: Designation of Lands (e.g., Wilderness, IRAs, other specific areas)

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Reconsider the proposal to designate the Sly Creek open area for public motorized vehicle use. Plumas National Forest currently has one motorized vehicle open play area of 4 acres (p. 6). An open area allows motorized vehicle use throughout the designated area. Action Alternatives 2,4, and 5 would designate an additional open area of 36 acres adjacent to the South Fork Feather River just below the dam at Sly Creek Reservoir for year round use for

vehicles 50" or less in width (pps. 15, 130). This open area is within the riparian conservation area and has significant existing water resource effects which must be mitigated before it is open for public use. These existing adverse effects include a steep, rutted access approach which is eroding; and access via an ephemeral channel from the Sly Creek Campground which is causing discharge of traffic-related sediment to and beyond the downstream paved road drainage system (p. 89). EPA has significant concern with the designation of the Sly Creek open area adjacent to a reservoir, in a riparian conservation area, and with existing significant water resource effects.

Recommendation: EPA urges the Forest Service to reconsider the proposal to designate the Sly Creek open area for motorized use. We recommend the FEIS provide additional information regarding the current use and resource effects of the proposed Sly Creek open area. For instance, state whether the Sly Creek Reservoir and adjacent South Fork Feather River serve as drinking water sources or as critical fish habitat.

Response

Information regarding beneficial uses near the proposed Sly Creek area has been added to section 3.5.6.2. Sly Creek Reservoir and the South Fork Feather River, situated adjacent to and downstream of the proposed open area, do not serve as critical fish habitat. South Feather Water and Power Agency manages Sly Creek Reservoir as a source for municipal water supply. Current adverse impacts from the area do not significantly affect Sly Creek Reservoir as a source for municipal water supply and prescribed mitigations would ameliorate these impacts. PNF watershed staff recommends that this area not be open to motorized traffic until these mitigations are in place.

Comment 11

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Factual correction made (SEE CITATION, RESPONSE)

Citation: FEIS Ch.3, Soils and Water Resources--Season of Use Mitigations.

Describe and implement seasonal closures. Provide information on wet weather conditions and related environmental impacts. Appendix A: List of Routes and Resource Impacts includes seasonal closures for specific trails. However, the DEIS does not describe these seasonal closures nor the criteria that would trigger their use. Furthermore, the DEIS does not describe winter or wet weather conditions nor whether wet weather use of existing NFTS and unauthorized roads and trails results in significant environmental impacts. We note that many of the existing unauthorized routes cross ephemeral or intermittent stream drainages with no installed stream crossing structures because they were created for temporary use during the dry summer season (p. 13).

Recommendation:
EPA recommends expanded use of seasonal closures as a means to avoid and minimize adverse resource effects of roads, trails, and motorized use. The FEIS should provide information on winter and wet weather conditions and, if present, any significant environmental impacts caused by wet weather road and trail use.

Response

The Soils and Water Resources Section in Ch. 3 of the FEIS, now includes a lengthy discussion about the "Season of Use Mitigations".

Comment 12

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Naturally Occurring Asbestos: Do not add trails on land "most likely" to contain naturally occurring asbestos such as serpentine soils. The Forest has approximately 56,554 acres of serpentine soils, primarily in bands along the western slopes of the Forest (p. 277). There are 40 miles of existing system trails and unauthorized routes in serpentine areas (p. 283). Alternative 5 Preferred Alternative would designate 6.5 of these miles for motor vehicle use, and Alternative 2 Proposed Alternative would designate 14 of these miles. Five trails are entirely in serpentine soils (p. 54). Disturbance of rocks and soils that contain naturally occurring asbestos (NOA), such as serpentine soils, can result in the release of asbestos fibers to the air and exposure to the public. Asbestos is a known human carcinogen and represents a potential human health risk for those exposed while using roads or trails where it occurs.

The DEIS states that the presence of asbestos and health risks to trail users has not been determined pending development of determination guidelines by the Forest Service Pacific Southwest Region. The Forest will follow the guidelines when they are available and implement mitigation measures required by the Region if health risks are

found to be present.

Recommendations:
Additional miles of native surface roads or trails on land "most likely" to contain naturally occurring asbestos (NOA), such as serpentine soils, should not be added to the NFTS or designated for motorized vehicle use. If such miles are added to the NFTS, the FEIS should provide the rationale for their addition and include data to demonstrate that these additional miles would not significantly increase the risk of adverse health effects:

For heavily used existing roads and trails on land "most likely" to contain NOA, we recommend assessing the potential for exposure to elevated levels of NOA. This information should be provided in the FEIS. We [U.S. EPA Region IX] recommend prohibition of public motorized use and closure of roads and trails where monitoring indicates the potential for significant NOA exposure. The Forest should post signs informing visitors that NOA is present, what the risks are, and how visitors can avoid exposure. These measures should be incorporated into the Preferred Alternative and committed to in the Record of Decision (ROD).

Response

The Serpentine soils can produce asbestos dust that may cause health concerns. Table 15 depicts the number of miles of trails proposed to be added to the NFTS that traverse serpentine soils and the total miles of serpentine soils traversed by those trails. Five trails (5M11, 5M13, 8M11, 8M23 and 8M32) are entirely in serpentine soils. The presence of asbestos in serpentine soils and health risks to trail users has not been determined. The Pacific Southwest Region is developing guidelines for determining the presence of asbestos and the health risks to the public. The Plumas NF will follow the guidelines when they are available and implement mitigation measures required by the Region if health risks are found to be present. Potential mitigation measures are anticipated to include public notice of asbestos hazards, closure of portions of trails to the public, and seasonal closure of portions of trails to the public.

Comment 13

Action: Classification

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Sensitive Habitats
Avoid designation of routes within Critical Aquatic Refuges. The DEIS predicts a moderate to high direct and indirect effect to Critical Aquatic Refuges for the Federally listed threatened California Red-Legged Frog (p. 123) and Forest Service designated sensitive Mountain Yellow-Legged Frog (p. 144). Critical Aquatic Refuges are specifically created to protect vulnerable species and to serve as existing refugia for at risk species (p. 116). With the exception of alternatives 3 and 4, none of the action alternatives will meet all six of the criteria found in the Programmatic Agreement between the Forest Service Pacific Southwest Region and US Fish and Wildlife Service to meet a "No effect, not likely to adversely effect California Red-Legged Frog and their population" determination for public motorized travel management projects (p. 124).

Recommendation:
We [U.S. EPA Region IX] recommend removal from designation all routes within Critical Aquatic Refuges which may adversely affect vulnerable populations of threatened, endangered, and sensitive aquatic species.

Response

The Forest has begun early involvement with the United States Fish and Wildlife Service (USFWS) as of February of 2008, and continues to communicate with the Service on an ongoing basis (pers. comm. K.Squires, 2009). Discussions to date have included the use of the Regional Programmatic Agreement that includes the Motorized Travel Management Project Design Criteria for 'No effect' or 'May Affect Not Likely to Adversely Affect' determination for the California red-legged frog (CRLF) (October 2006). Recommendations include incorporating the six design criteria specific to the CRLF into Alternative 4. Alternative 4 meets all the criteria to lead to a "May affect, not likely to adversely affect" determination for the CRLF.

The Forest Service is currently in formal consultation on the Preferred Alternative (Alternative 5) working outside the programmatic agreement. Currently Alternative 5 does not meet the programmatic agreement because there are proposed designated trails within CARs. However, our Forest Plan does allow for ground disturbing impacts, such as designated trails within CARs, and Alternative 5 complies with our Forest Plan direction (standard & guideline 94, page 62) in this regard. However the regional programmatic agreement failed to consider this standard & guideline direction, which is one of the reasons the Plumas NF felt compelled to consult with the FWS outside the programmatic agreement.

The Forest is also consulting with the USFWS because there is the potential for direct and indirect effect to the CRLF by the preferred alternative. Mitigations have been developed (in consultation with the USFWS) to reduce impacts to CRLF and its habitat, and the Forest Service will comply with any terms and conditions set forth by the US Fish and Wildlife Service in the Biological Opinion.

The Forest has carefully reviewed each route and the associated hydrologic surveys and results of amphibian surveys and site assessments and any route that has the potential to cause increased sedimentation into the

streams will be mitigated. Those routes identified as egregious and classified as extreme were not proposed for the action alternatives. The Forest has identified four bridge locations in the Granite Basin area to protect the MYLF and it's habitat. The Forest has identified three bridge location in the Jack's CAR (French Creek watershed. The Forest has been very conservative in allowing any routes near known TES amphibian locations, and any routes that the potential to directly or indirectly affect these species will be mitigated.

Comment 14

Action: Monitoring, Inventories

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Monitoring and Enforcement
Develop, describe, and implement a Travel Management Plan Monitoring and Enforcement Strategy. It is important that wildlife protection, vegetation management, and erosion control goals be achieved to minimize the potential adverse effects of the Motorized Travel Management Plan. Effective enforcement is especially critical given the proposal to designate trails with existing resource concerns requiring mitigation prior to use (p. IV). We [U.S. EPA Region IX] believe the public and decision makers would benefit if a strategy is developed that includes specific information on funding, monitoring and enforcement criteria, thresholds, and priorities.

Recommendations:
We recommend development of a detailed Travel Management Plan Monitoring and Enforcement Strategy. Such a Strategy should include specific information on the monitoring and enforcement program priorities focus areas (e.g., issues, specific locations), personnel needs, costs, and funding sources. We recommend the FEIS demonstrate that the proposed monitoring and enforcement strategy is adequate to assure that motorized vehicle use will not violate access restrictions or exacerbate already identified road-related resource problems. We recommend the Monitoring and Enforcement Strategy be periodically updated (e.g., annually or biennially).

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

The preferred alternative, Alternative 5 will require mitigation to be complete before roads with effects may be added to the MVUM. Appendix A shows an asterisk next to each route that will require mitigation. All routes determined by resource managers to be "Extreme" have been dropped from Alternative 5. See Ch. 2 of the FEIS, Monitoring section for a complete list of monitoring.

Comment 15

Action: Classification

Resource(s): Climate

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Climate Change
Address climate change and its potential effects on proposed route designations. A number of studies specific to California have indicated the potential for significant environmental impacts as a result of changing temperatures and precipitation.2 Climate change effects and the need to adapt to climate change are emerging issues which should be considered in this action. According to the Government Accountability Office (GAO) report entitled, "Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources" (August 2007), federal land and water resources are vulnerable to a wide range of effects from climate change, some of which are already occurring. Roads and their use contribute to species stress through habitat fragmentation, increased disturbance, and introduction of competing invasive species, and increased fire risk; which may further exacerbate species' ability to adapt to the changing climate.

Recommendations:
The FEIS should include a discussion of climate change and its potential effects on the Forest as they relate to the route designation decision and final National Forest transportation system. Of specific interest are potential cumulative effects of climate change and the NFTS on the connectivity of wildlife and threatened and endangered

species habitat, air quality, water quality, fire management, invasive species management, and road maintenance.

We [U.S. EPA Region IX] recommend the discussion include a short summary of applicable climate change studies, including their findings on potential environmental effects and their recommendations for climate change adaptation and mitigation measures.

Response

The action is focused on managing where motor vehicles travel. This action does not regulate or increase the number of vehicles on NFS lands. The regulation of emissions is not within the jurisdiction of this agency. The Forest Service acknowledges that climate change has the potential to affect resources on the Forest.

Comment 16

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Full Disclosure and Procedural Comments
Commit to route-specific environmental analysis for user-created route additions. On some National Forest System lands, repeated use by motor vehicle travel has resulted in unplanned motorized trails un-authorized for motorized use. These trails were generally developed without environmental analysis or public involvement and may be poorly located and cause unacceptable impacts (p. 2). EPA is concerned with the addition of unauthorized user-created trails to the NFTS which may not have undergone site-specific environmental analysis or public involvement.

Recommendation:
The FEIS should state how the Forest will ensure specific user-created routes are adequately evaluated pursuant to NEPA requirements. Where prior site-specific environmental analysis has not occurred, we recommend the FEIS specify the manner and criteria by which specific user-created routes would be analyzed prior to the route's addition to the NFTS or its designation for public motorized use.

Response

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1).

Alternative 3 responds to non-motorized recreation interest in "Citizen Inventoried Roadless Areas (CIRAs)" proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 17

Action: See Attachment

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Letter: U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action. Environmental Impact of the Action.

Comment 18

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2]: Letter to Regional Forester Moore from Senator Feinstein regarding motorized routes. Date: December 18, 2008.

Letter 244

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Public Involvement

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to appeal your decision to remove several key OHV trails off of the Route Inventory without going through the NEPA process as outlined in all of your public meetings over the past 4 years.

This designation process has been frustrating in that key USFS personnel seem to rotate into and out of the process so that there is not continuity of management. Further I find the time commitment to be enormous to participate fully in this paper shuffle. First we had to turn in routes because the USFS and their contractors were unable to do a thorough inventory. We were encouraged to turn in any routes or risk losing them. We turned in the routes and were then asked to justify their need. Now you have dropped many of the routes without any NEPA process. This is not the way you initially sold the idea of public participation.

At several meetings prior USFS personnel solicited the "needs" that the OHV public was looking for in the resulting trail systems (Needs Analysis). What was recorded on chart paper was that the participants asked for the several items, including:

- Want Single Track
- Provide quality experience for all User Skill Levels
- System of Articulated Trails (Loops and Destinations)

Response

All proposed trails had to be surveyed by resource specialist to access their suitability to be included in our designated motorized trail system. Additional routes can be added in the future with additional analysis.

Comment 2

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am worried that what the PNF will give the public are graveled roads (i.e. OHV route 43) instead of single track, beginner level OHV experiences instead of a meeting the needs of a variety of skill levels, and a system of scatted

dead end OHV routes instead of a well planned articulated network of trails.

Response

With the publishing of quality OHV recreation maps, it is expected that people unfamiliar with the Plumas National Forest will start riding trails that are currently not on any maps. We expect the public riding experience will increase with a cohesive well designed recreation OHV system.

Comment 3

Action: Traffic control and safety

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

A greater concern is for the safety issues and resource damage inherent in concentrating OHV use from the entire forest, thousands of miles, onto a few hundred miles in a few locations. Examples of this can be found across the valley at Stoneyford and in the Los Padres NF at the Pozo OHV area.

Response

Due to the expected low OHV use on the Plumas National Forest, it is expected that trail use between alternative 2, 4 and 5 will be insignificant.

Comment 4

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

By removing several key trails from the existing inventory you are precluding the opportunity to create a showcase OHV route system that is sustainable. I look forward to working with you via the Sierra Access Coalition and Paradise Ridge Riders Club to come up with a showcase system of trails. Management by closure is not management, although it is less work.

Response

Routes that are not designated with this project may be added at a later date as no routes will be decommissioning with this project.

Letter 245

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	Request for 90 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I am requesting an extension of the DEIS comment period. I can not read, interpret, or understand a document written by a team of Agency employees over a period of years in a mere 45 days.

40 CFR 1500.1 clearly states that:
"Ultimately, of course, it is not better documents but better decisions that count. NEPA's purpose is not to generate paperwork--even excellent paperwork--but to foster excellent action." And "public scrutiny is essential to implementing NEPA" And Section 102(2) contains "action-forcing" provisions to make sure that federal agencies act according to the letter and spirit of the Act."

40 CFR 1500.5 says:
"Agencies shall reduce delay by: Establishing appropriate time limits for the environmental impact statement process"
40 CFR 1501.8 (b)
"(iv) Degree of public need for the proposed action, including the consequences of delay.
(v) Number of persons and agencies affected. (vii) Degree to which the action is controversial."
No where in there is a hurry up and just get it done statement. That seems to be the defining rule here and is in conflict with the letter and spirit of the CEQ. Quite frankly, this decision is very controversial, will affect millions of forest visitors, provides the smallest possible window for public scrutiny and effectively castrates their ability to make informed significant comments.
To resolve this complaint, I have but one request:

Extend the comment period to a total of 90 days to conform to both El Dorado and Tahoe forests comment periods.

Response

The comment period was extended 30 days.

Letter 246

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Planning Document (Rule, EIS, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page1 – 1.2 Background

It is a disingenuous statement to assert that OHV's are the primary culprit for the unplanned roads and trails that exist. While there may be some locations (primarily single track motorcycle trails) where that is true, the vast majority are legacy roads/trails from the extensive logging and mining history. I was constantly alerting

management to the defacto increase in the non-classified roads that were being left on the landscape after harvest operations. It was quite common to leave a temporary road on the landscape and designate it as closed with water bars and/ or a small barrier. Additionally, there are all the skid trails where no attempt was made to uncompact them and restore the productive capacity. The Forest Service is responsible for the vast majority of the non-system roads and skid trails that the OHVs have subsequently found and begun using. Whatever degree of compaction exists on the roads/trails being used by OHVs is a result from the logging operations not from the minuscule pounds per square inch (PSI) imparted by an OHV. To the extent that any locations are experiencing erosion or sedimentation problems the Forest Service should consider the source of the disturbance, overwhelmingly they been non-OHV vehicles. They were responsible for selecting or approving the vast majority of these locations during the timber harvest operations. They were also responsible to ensure that appropriate and necessary erosion control features were implemented. They are required to review these features for up to a year after installation to ensure their effectiveness.

The Forest Service needs to cross reference the inventoried unmanaged road and trail system that has been identified with maps of the prior timber sale operation if they believe my assertion is inaccurate. The Forest Service is also requested to produce documentation that they did their due diligence and checked off the effectiveness of the erosion control measures applied post harvest. The Forest Service has cast aspersions on the OHV community when the blame lies with them and their past practices.

Comment 2

Action: Monitoring, Inventories

Resource(s): Transportation

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: FEIS Ch. 2, Monitoring

Page 11 – 2.3.1 Monitoring

The Forest Service is requested to produce documentation of their past use of the deferred maintenance condition survey protocol. What roads and/or trails have actually been monitored over the last 20 years? The Forest Service past actions indicate whether proposed actions can reasonably be expected to be implemented.

The Forest Service is requested to produce the Travel Management Monitoring Plan that all action alternatives will adhere to. Without being able to evaluate that document the reader cannot make an informed analysis of the extent and degree that any or all action alternatives comply. The Forest Service is not ready to make an informed decision until this crucial plan is made available to the public for their review with the DEIS.

The Forest Service identifies that a "monitoring strategy" is important to develop. Why isn't it developed now? When will it be developed? The public should be involved with its development and implementation.

Response

Each specialist has outlined in Chapter 2 the monitoring needs for their resource (FEIS Ch. 2, Monitoring)

Comment 3

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 13 – 2.3.3 Mitigations for Soil and Water Resource Impacts

The Forest Service continues to blame the users for the condition of the trails yet the forms do not provide for identifying how the trails were generated. It would appear the Forest Service has some data about how trails were generated that they have not shared with the public. The Forest Service needs to provide the public with a listing of each trail segment and how the trail was generated and whether it was user-created or a legacy feature from past logging or mining.

Response

Section 3.5.3.1 states that existing unauthorized routes are typically old temporary roads used in past timber sales, old firelines, or user-created routes. The method of route creation is immaterial in relation to soil and water resource effects due to each route.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 13 – 2.3.3 Mitigations for Soil and Water Resource Impacts

The Forest Service discussion of stream crossings identifies what a typical crossing mitigation would consist of, namely, a rocked ford. The Forest Service is being hypocritical in indicating a much higher standard they require for logging operations. Skid trails and temporary roads rarely impose this level of mitigation. It is common for logging to cross ephemeral or intermittent drainages without crossing structures. The standard protocol is to remove most of the material within the high water mark and water bar of either side of the crossing. Not all of the material is removed but it is flushed out later during the winter. Depending on the topography, the water bars can be up to 20 or more feet away. Most of these crossing do not receive any mulch to inhibit surface erosion into the channel. The Forest Service is indicating that armored dips are likely to be required where culverts exist. Again, this discussion is fraught with hypocrisy. There is no such standard applied to the system roads of the Forest.

The Forest Service is indicating the OHV routes would be held too a much higher standard they require of themselves and their contractors.

Response

Rock armor for proposed trail fords at stream crossings is a mitigation to keep trail surface and fill slope soils in place. Clarification has been added to the "Mitigations for Soil and Water Resource Impacts" section of Ch. 2 of the FEIS to state that native surface fords may be appropriate, depending upon soil type, for low gradient streams. Unlike the skid trail and temporary road features used in timber management projects, the trails proposed for addition to the NFTS are presumed to be permanent facilities.

Comment 5

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 14 - 2.3.4 Descriptions of the Alternatives

The listing of trails needs to include the origination of the trail segment i.e., legacy form logging, mining, user created, or some other source. What the Use Evaluation Field Form provides for is to characterize what type of vehicle could use the trail. It does not identify the specific width of the travel way. We are left to infer based on the vehicle type listing. With this perspective it appears segments listed in Table 1 as "All" came into existence as I previously specified, from logging or mining operations. Those that are listed as less than 50" in width are likely legacy roads and skid trails that are been encroached upon by vegetation growing from the edges. Only the motorcycle only can reasonably be attributed to a status of user created.

Response

The origin of the proposed trails does not have a bearing on the condition of the proposed trail. The vehicle type was determined by the type of vehicle using the trail. In some cases a motorcycle trail is on an abandoned skid trail with 16" trees growing in the road bed.

Comment 6

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 14 - 2.3.4 Descriptions of the Alternatives

What becomes evident is the distinct difference between the Westside and the eastside of the Forest due to motorcycle activity. The Westside has the vast majority of the motorcycle only trails.

Those trail segments that were generated through Forest Service activities are the responsibility of the Forest Service to apply any necessary mitigation needed to bring the trail to a safe and environmentally sustainable condition. The Forest Service needs to acknowledge this responsibility and establish a time line for accomplishing it.

Response

The majority of motorcycle routes on the west side of the Plumas National Forest were user created. The remaining routes utilized overgrown skid trails, temporary roads and old railroad grades.

Comment 7

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Not within document/decision scope (SEE RESPONSE)

Page 53 – 3.3.3.1 Affected Environment/Environmental Consequences

The Forest Service acknowledges that the road system is not being maintained as in the past and that the use is much less given the greatly reduced logging activity. The Forest Service needs to re-analyze the Level III roads in light of the significant reduction in usage. The purpose is to display what the historic use level was when the Level III status was assigned versus current usage. The Forest needs to disclose to the public what criteria are used in determining a roads classification level.

It is understood that the Travel Management Plan is not intended to analyze the existing transportation system. But in this case, the Forest Service needs to incorporate that analysis with the EIS, given the highly significant effect it has on the overall network of trails being considered for OHV use. This is paramount to the quality of the riding experience, namely, being able to ride for extended periods without having it interrupted by segments of Level III that would be off limits. Extended riding on Level III roads is not the objective. They are a means to an end. Namely, to efficiently access the narrower, lower traffic roads that give a more enhanced rider experience.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation.

Comment 8

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Page 53 – 3.3.3.1 Affected Environment/Environmental Consequences

The Forest Service makes reference to safety issues pertaining to "roughly graded" versus "passenger car roads". They then site the California Vehicle Code (CVC) as "allowing operation of non-highway vehicles on roughly graded roads". This statement is true but incomplete and misleading. The CVC allows non-highway vehicles use on any forest service road. The Forest Service has been deceptive in their biased presentation of the CVC. I talked with Officer Stone of the local California Highway Patrol (CHP) on February 25, 2009. He indicated that he had been requested to provide the Plumas NF with data on accidents occurring on forest service roads. He didn't recall the time frame that the data covered, but there were about 100 accidents. I then asked if the data was subdivided by car on car versus car on OHV. He stated he wasn't asked that. I asked. He then recalled that the vast majority were car/truck on car/truck and a small amount were car/truck on OHV and almost no car/truck on motorcycle. The Forest Service needs to request the CHP database - Statewide Intergraded Traffic Reporting System (SWITRS) be accessed again and data collected and put into context to display how the accidents relate to vehicle type and road type (roughly graded versus Level III). The Forest Service then needs to display this data. This will either support or refute whether there is any correlation to those accidents and potential for future accidents involving

OHV on Level III roads.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads. Plumas NF policy is consistent with Regional direction.

Analysis of the existing road system and decisions on new roads, road decommissioning, road reclassification and mixed use on ML 3-5 roads was not required by this FEIS. Some mixed use on ML 3 roads was considered by discretion, but not all ML 3-5 roads were analyzed for mixed use or other action by this effort.

Comment 9

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

Page 53 – 3.3.3.1 Affected Environment/Environmental Consequences

The Forest Service has manipulated the presentation in section 1B2 to convey the impression that there is increased risk with motorized mixed use (MMU) on Level III roads. The only comment that is presented is to state that the 11.3 miles of Level III roads they've selected have no accident history and very few safety concerns. The Forest Service offers no data on the other 392 miles of Level III roads. The Forest Service needs to disclose if the information the CHP has collected from the approximately 100 accidents was the principle basis for their position the MMU is a hazard on Level III roads. If it was, then they have not done their due diligence to fully analyze the data and have erroneously misinterpreted a data summary.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads. Plumas NF policy is consistent with Regional direction.

Analysis of the existing road system and decisions on new roads, road decommissioning, road reclassification and mixed use on ML 3-5 roads was not required by this FEIS. Some mixed use on ML 3 roads was considered by discretion, but not all ML 3-5 roads were analyzed for mixed use or other action by this effort. Future consideration of changes to system roads is not limited by this decision.

Comment 10

Action: Traffic control and safety

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

Page 53 – 3.3.3.1 Affected Environment/Environmental Consequences

The Forest Service's attempt to restrict OHV access to Level III roads for safety reasons is without merit and cannot be supported by the data. Maximum access to Level III roads is paramount to the quality of the riding experience, namely being able to ride for extended periods. With only limited use of Level III roads (11.3 miles) the quality and enjoyment drops precipitously as many outings would be constrained as the numerous intersections with Level III roads would break up the trip continuity. Increased loading and unloading and extensive trailing on poorly maintained (full of wash boards) Level III would be required. This is a fatal flaw.

Strong support can be made for position that Level III roads pose no greater safety concerns than other roads. In fact they are probably safer. That's what prompted the Forest Service to build these roads to a higher standard. These roads have much greater travel width, straighter alignment and are generally on gentler grades. All this provides greater visibility to increase safety. OHVs are much smaller that passenger vehicles providing greater maneuverability and greatly reduced stopping distance. I suspect that the CHP database will show that most accidents occurred on narrow road segment when a curve was involved and sight distance was reduced.
The Forest Service should be willing to meet and discuss each Level III road segment and see if some common

ground can be reached to provide for safety and optimum OHV trip continuity. It would be reasonable to reserve the right to impose seasonal closure to OHVs of some Level III segments when substantial increases in traffic can be expected, such as during a logging operation.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads. Plumas NF policy is consistent with Regional direction.

Analysis of the existing road system and decisions on new roads, road decommissioning, road reclassification and mixed use on ML 3-5 roads was not required by this FEIS. Some mixed use on ML 3 roads was considered by discretion, but not all ML 3-5 roads were analyzed for mixed use or other action by this effort. Future consideration of changes to system roads is not limited by this decision.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links. New routes to benefit these networks may be analyzed in the future, but are beyond the scope of the existing routes analyzed by this effort.

Comment 11

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 56 – 3.3.3.3.1 Direct and indirect Effects

The statement "These routes would continue to cause resource damage and would need a certain amount of maintenance in order to continue to be usable" is not appropriate. It implies that all of the existing trails are in this condition. The Forest Service needs to quantify and specify which routes/trails this applies to. I maintain that the majority of the trails on the eastside of the forest have no such condition, or no more than the adjoining system roads.

Response

The majority of proposed trails are in need of maintenance or mitigations in order to reduce resource concerns. Our system roads also require periodic maintenance.

Comment 12

Action: Document Composition (clarity/grammar/spelling/punct.)

Resource(s): Technical/Editorial

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 56 – 3.3.3.3.1 Direct and indirect Effects

The use of the word "route" needs to be unilaterally replaced with "trails". You need to be consistent.

Response

We used route to refer to unauthorized routes and trail to refer to proposed motorized system trails.

Comment 13

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 70 – 3.5.3 Effects Analysis Methodology

The record states that 739 miles of 1109 miles of existing routes were not surveyed for existing condition. This statement leaves the reader to wonder why such an abbreviated amount of survey was conducted. How can an informed decision be made when such a limited scope of the candidate pool was considered? The Forest went to extensive efforts to solicit input from the public to identify potential trails for inclusion in the OHV plan. To what end; for 2/3 of the trails to be left on the cutting room floor with no consideration in the proposal?

What basis did the Forest use to drop these segments? The Forest has also made a unilateral decision to preclude trail segments under a certain length from being considered in the proposal. This big brother mentality presupposes that you know best what use (woodcutting perhaps?) or enjoyment the public may get from accessing these trails. As long as a one of these trail segment is not causing resource damage or if and until the Forest does an analysis that results in a decision to close and/or obliterate a trail, it should be left to the discretion of the public whether to use a trail or not.

These are significant flaws that seriously and arbitrarily impact the OHV experience and would not allow for an informed decision.

Response

The routes were identified through a lengthy public involvement process. The Proposed Action (Alternative 2) contains the proposed changes to the NFTS and the prohibition of cross-country travel as described in the NOI published January 3, 2008 (Volume 73, Number 2). The proposed action was designed to provide a high level of access and motorized recreation opportunity based on the purpose and need in Chapter 1. It was developed with extensive public involvement and collaboration (as described in Chapter 1). The initial proposal consisted of known routes used by the public, including destinations, loops, and spur routes to fishing access and favorite dispersed camping sites. The initial proposal avoided routes on private land with no right of way, routes where motorized use would conflict with existing uses, and routes with measurable resource impacts. Information meetings were held in Quincy, Portola, and Oroville in April. Followup workshops were held in each city during May.

Alternative 3 responds to non-motorized recreation interest in “Citizen Inventoried Roadless Areas (CIRAs)” proposed by the Wilderness Society and natural resource impacts by prohibiting cross-country travel without adding any additional facilities to the NFTS. This alternative also provides a baseline for comparing the impacts of other alternatives that propose changes to the NFTS. None of the current unauthorized routes would be added to the NFTS.

Alternative 4 and 5 resulted from extensive on the ground surveys of the proposed routes in Alternative 2. Each route was surveyed and any mitigations identified. Alternative 4 dropped all of the routes in the Jack Critical Aquatic Refuge, routes in the Citizen Inventoried Roadless Areas, and routes that were identified as having high and extreme effects to resources. Alternative 5 was almost the same as Alternative 4, only differing in that all of the routes with high ratings would be shown on the MVUM once the mitigations were completed that gave the route a high rating.

Comment 14

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 74 – 3.5.3.2.2 Water Resources

“For the approximately 50-200 feet of a well designed road or trail surface … that approaches the stream channel on both sides of the crossing, there is really no other place for the surface-generated sediment to go but into the stream channel.”

This is a self serving statement that is not a universal truth.

Response

Clarification has been added to section 3.5.3.2. The statement applies to the segments of roads and trails between a stream crossing and the nearest surface or ditch cross-drain structure. The FEIS clarifies that some surface-generated erosion may be buffered by streamside vegetation.

Comment 15

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 75 – 3.5.3.2.2 Water Resources

"Active restoration or obliteration of one or more unauthorized routes or areas is not part of any of this project's action alternatives". Emphasis added.

The Forest displays benign neglect when it cavalierly discounts the on going resource impacts occurring from some unauthorized trails. The Forest needs to identify which trails segments they have identified in this condition and whether the trail is a legacy from past Forest operations or is user created. I found it enlightening that your photographs of resource damage were all on system roads. Couldn't find any from the user created trails? The Forest would have no credibility as a land steward if it pursues such a short term approach. If not now, when? It appears the Plumas's land ethic is satisfied with letting nature take its course. So the basic philosophy of the Forest is resource damage isn't so bad as long as no one sees it and the public is not contributing to it in some minor way. The Forest Service seems to have forgotten a part of their motto "Caring for the Land".

The Forest could appear to care, if it identified that funding options will be sought out and corrective action taken when funds are available.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The Directives published Jan. 8, 2009 apply to all new projects 7712.1. This project began prior to the directives and is not subject to them; however, future projects may include travel analysis, particularly large fuels/veg projects. The Forest plans to approach vegetation management projects, watershed restoration projects, fuel treatment projects, and trail construction projects with a comprehensive travel analysis looking at the existing road system, determining which roads are resource concerns and need decommissioning, as well as those that provide recreation opportunities or future management activities but may need improvement. As these project-specific analyses are completed, the Forest will proceed with a separate NEPA process; informing the public prior to performing any road improvement, decommissioning, reconstruction or relocation. Funding sources will be pursued by the Forest as work is identified, including grants, appropriated dollars, etc.

Comment 16

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.3.1

Page 76 - 3.5.3.2.2 Water Resources

"Sediment production from motor vehicle use of native-surfaced NFTS routes is typically increased by higher levels of traffic …"

This broad generalization only has merit when there is a direct convenience from the road surface to a channel. For this to be true there would be direct visual evidence that an observer could see where material removed from a trail/ road surface traveled to a channel where it becomes sediment. The vast majority of soil moved off of the trail/road travels only a short distance and is trapped and confined by the duff and litter. It's not sediment if it doesn't enter a channel. The intent seems to mislead the public rather than educated them.

Response

The FEIS Ch. 3 section for Soil and Water Resources recognizes that road- and trail-generated erosion is characterized as sediment only when it enters a stream course. Appendices F, G, and H of the Soil and Water Resource Report note proposed trails that were determined to have delivery of route-generated sediment. Those determinations were based on direct visual observations during field surveys for each route. See the "Field survey methodology" portion of section 3.5.3.1 and the Field Data Collection Form in Appendix C of the Soil and Water Resource Report.

Comment 17

Action: Cumulative/Combined Effects

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 82 – 3.5.4.1.4 Cumulative Effects of the Three Alternative Components as a Whole

I concur with the statement that "the vast majority of the soil and water resource effects of the unauthorized routes and areas that are proposed for addition to the NFTS have already occurred since these routes currently exist on the landscape". This statement would likely apply equally too many of the 739 miles not surveyed. And many of those miles may not have any ongoing resource damage.

Comment 18

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.4

Page 91 – 3.5.6.2.2 Cumulative Effects

The third paragraph is completely erroneous.

The assertion is made that by discontinuing use of some trail segments, that the road density is decreased. Huh? Do you really think that by stopping use the road would no longer exists? This is voodoo analysis.

Response

The cumulative watershed effects indicator for this project analysis, stated in section 3.5.4, is the density of proposed trails and roads "open to motorized traffic." Passive recovery, over a 25-30 year timeframe, of soil cover and vegetative productivity of the routes not added to the NFTS is assumed, with concurrent reductions in erosion and sedimentation. The effects of passive recovery are described in the Alternative 2 direct/indirect effects analysis for prohibition of cross-country travel. This section recognizes that, without active restoration or obliteration, some of the soil and water effects of the non-proposed routes will persist. However, the trail and road density indicator provides a relative comparison of the passive recovery effect that would occur under each alternative.

Comment 19

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 91 – 3.5.6.2.2 Cumulative Effects

The third paragraph is completely erroneous.

The Forest Service maintains that prohibition of cross-country traffic on areas currently untracked would improve long-term watershed condition and risk of cumulative effects would decrease. If you believe this always happens then how can you allow any equipment off of designated skid trails? Since the Forest has no such prohibition for logging operations, they are again being disingenuous and using Pollyanna statements to mislead the public. Not doing something rarely results in an improvement. It can maintain the status quo.

Response

The direct/indirect effects analysis for Alternative 1 (no-action) states that, without a prohibition of cross-country travel, soil and water impacts "could" occur on areas that are currently untracked. One case where such impacts did occur was on a hillside with jeep traffic near Smith Lake on the Mount Hough Ranger District, a site that was rehabilitated in 2006 using restoration grant funds from the California State Off-Highway Motor Vehicle Recreation Division. The analyses for Alternative 2 and the other action alternatives state that such impacts would be prevented. Clarification has been added to section 3.5.6.2 of the FEIS that such impacts are more likely to occur on steep slopes.

Comment 20

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.4

Page 91 – 3.5.6.2.2 Cumulative Effects

The third paragraph is completely erroneous.

Does the Forest Service maintain that installing walking trails such as those at Lakes Basin or the Pacific Crest Trail damage long-term watershed condition and risk of cumulative effects? I think not.

Response

The road and trail density indicator for cumulative watershed effects is the density of proposed motorized roads and trails. Walking trails are not included in the density calculations.

Comment 21

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Page 91 – 3.5.6.2.2 Cumulative Effects

The third paragraph is completely erroneous.

The Forest Service generalizes that any cross-country traffic is likely to result in erosion and disturbance of the A-horizon as well as modification of surface runoff timing and magnitude due to vehicle track ruts on currently untracked areas. This assumes facts not in evidence. I challenge the Forest Service to document this assertion. I maintain an OHV can make many passes cross-country without doing any of the things you claim. I'm not saying it can't happen. I can easily envision a motorcycle being operated on slope with sufficient speed to generate some surface disturbance. But, a 4-wheeled OHV moving through the woods at low speeds (generally 5 miles per hour) would leave no detectable trace. Those preparing this document apparently have little to no personnel knowledge of riding an OHV.

Response

The direct/indirect effects analysis for Alternative 1 (no-action) states that, without a prohibition of cross-country travel, soil and water impacts "could" occur on areas that are currently untracked. One case where such impacts did occur was on a hillside with jeep traffic near Smith Lake on the Mount Hough Ranger District, a site that was rehabilitated in 2006 using restoration grant funds from the California State Off-Highway Motor Vehicle Recreation Division. The analyses for Alternative 2 and the other action alternatives state that such impacts would be prevented. Clarification has been added to section 3.5.6.2 of the FEIS that such impacts are more likely to occur on steep slopes.

Comment 22

Action: Adequacy of Studies (Best Available Science)

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 91 – 3.5.6.2.2 Cumulative Effects

The third paragraph is completely erroneous.

I believe it would be appropriate to disclose the OHV experience credentials of the Forest Service personnel making statements about the effects of OHVs.

Comment 23

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 100 - 3.5.6.5.1 Direct and Indirect Effects

The Forest Service continues to refer to the legacy roads and trails from its past operations as unauthorized. The Forest Service authorized most of them and needs to catalog the source of the trails and give credit where credit is due when it refers to these trails.

Response

The majority of inventoried routes were constructed in timber sales as temporary roads or skid trails. They were not intended to be used in the future, used only for a short time frame. Many routes have also been created my users by repeated use on routes outside of timber sales.

Comment 24

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Page 100 - 3.5.6.5.1 Direct and Indirect Effects

Passive re-vegetation on compacted roads and trails from logging operations is not the panacea it is purported to be. This concept came into vogue when I was working on the Plumas in the early 1980's when the NEPA process required a hydrologist to come up with a way to characterize long term effects of logging operations. It was a best guess as to what amount of time would be needed for sufficient vegetative recovery to occur to lower the cumulative effects to near background. It has never been tested or verified. Just as the threshold value for percent of a watershed in equivalent roaded acres (ERA) has never been monitored or tested. They have become imbedded into Forest Service methodology from which the cumulative effects methodology is based on. These are numbers games without any scientific basis.

The ironic part to this situation is that without the national direction to prohibit cross-country traffic the vast majority of these so called unauthorized trails would continue to be what they have always been - legacy temporary roads and skid trails from previously authorized Forest Service logging operations that became popular routes with OHV's for various reasons. The miles that have been identified are not the complete story. They only represent the ones you found or the public brought to your attention. There is still a vast array of old temporary roads and skid trails present of the landscape that haven't been identified. I know I've seen them while I was doing my due diligence performing the field review of proposed timber sales.

The many misstatements and flawed descriptions of the soil and water resources cast serious doubts on the professional skills and savvy of the person(s) responsible for generating them.

Response

Passive recovery effects on existing, unauthorized routes due to prohibition of motorized travel are described in the direct / indirect effects portion of section 3.5.6.2. Limitations to the completeness of the GIS layer for routes currently open to motorized traffic are noted in section 3.5.4.

Letter 247

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter

Delivery Type	Email
Comment Extension	Request for 45 Day comment period extension
Request Information	None

Comment 1

Action: Adequacy of Comment Period/Project Timeframe

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I am requesting an extension of the 45 day comment period, for the Plumas Travel management DEIS. This does not provide adequate time for volunteers to read, research, and write substantive comments. Please extend the comment period to 90 days, as prescribed by law.

Section 6 (d) of the National Forest Management Act requires three months of public comment for any Forest Plan or amendment.

This document is filled with reference material that is not included with the document. This requires extensive research.

Response

The comment period was extended 30 days.

Letter 248

Attributes

Attribute	Value
Early Attention	Government entities
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Not within agency's jurisdiction (SEE RESPONSE)

During your consideration of the DEIS Alternatives, please review the attached road lists and map showing County maintained roads as being open to mixed use. These non-paved mixed use County roads should be considered as loop access connectors to any of your designated National Forest Transportation System roads, trails and/or areas open to the public for motor vehicle use.

Response

County roads are not within the agency's jurisdiction. There is nothing in this Decision that affects vehicle use of County roads.

Comment 2

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Not within agency's jurisdiction (SEE RESPONSE)

The letter [to Randy Moore] states the Board supports the mixed use on County maintained non-paved roads leading and connecting to the National Forest System roads. Attached please find a list of non-paved County maintained roads leading to and connecting with Plumas National Forest. Also attached for your reference and consideration is a map showing the same roads highlighted in red and their relationship to the Plumas National Forest Lands.

During your consideration of the alternatives contained in the referenced DEIS, please consider these non-paved County maintained roads as being mixed use. These mixed use County roads should be considered as loop access connectors to any of your designated National Forest Transportation System roads, trails and/or areas open to the public for motor vehicle use.

Response

County roads are not within the agency's jurisdiction. There is nothing in this Decision that affects vehicle use of County roads.

Comment 3

Action: See Attachment

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Letter from Butte County to Randy Moore regarding mixed-use on County maintained roads. Letter Date: November 18, 2008.

Comment 4

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2]: Table of non-paved Butte County roads. From: Butte County

Comment 5

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 3]: Map of Butte County Maintained Roads. From: Butte County

Letter 249

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I just looked at the "Preferred Alternative 5" and noticed some very concerning details around the La Porte area - the few OHV trails that are left are separated by dirt "logging roads" that are now for only street legal vehicles (mainly Howland Flat road all the way to Poker Flat). This in effect prohibits anyone from enjoying the few trails that are left for OHV unless they have a street legal motorcycle. I own a cabin outside of La Porte and have 3 children and a wife who have enjoyed the trials up there for years and once one of these alternatives is enacted we will effectively be "shut out" of our forest. It's bad enough that I have spent many days and a lot of my own money mapping these trails (cooperating w/ the forest service) to then be locked out anyway because of this law.

Response

These are Sierra County Roads and considered public highways. They will be shown on our Motor Vehicle Use Map as Other Public Roads and Highways (no action).

Comment 2

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I am concerned with the "seasonal closures" as we all know that different seasons bring different amounts of rain/snow. For example I was in the Plumas this December and found it dusty - next year we will be shut out because of a date? Shouldn't conditions dictate when the forest is closed?

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Our family recreates in our wonderful forests and we "tread lightly", are fully aware of fire dangers, do trail work to prevent erosion, "pack out what we pack in", and follow all of other rules and requirements to respect our natural resources yet we are going to be penalized and blocked from the sport/lifestyle that we love. I have seen many logging sights and know that they do more damage in 1 day than all of us law abiding OHV enthusiasts do in a lifetime - why are we being penalized?

Please do what you can to work with us and to preserve this family treasure so my children can continue to enjoy the sport that I have for 35 years.

Response

§ 212.54 Revision of designations. Designations of National Forest System roads, National Forest System trails, and areas on National Forest System lands pursuant to § 212.51 may be revised as needed to meet changing conditions. Revisions of designations shall be made in accordance with the requirements for public involvement in § 212.52, the requirements for coordination with governmental entities in § 212.53, and the criteria in § 212.55, and shall be reflected on a motor vehicle use map pursuant to § 212.56.Long-term planning may identify potential corridors suitable for consideration for future construction. However, the agency does not intend to designate routes on a motor vehicle use map until such routes actually exist, have been analyzed and evaluated, and are available for public use. Section 212.54 of the final rule provides for revision of designations as needed to meet changing conditions. New routes may be constructed and added to the system following public involvement and site-specific environmental analysis. Such revisions may also include closures or changes in designations.

Letter 250

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 1 (No Action Alternative)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

While we [Quincy Wheelers] appreciate the responsiveness shown by the PNF in granting a 30 day extension to the original comment period, it is not possible for the Quincy Wheelers to offer support for any of the alternatives other than the "no action" Alternative 1 (the base line condition including the prohibition of non-permitted cross-country travel).

Comment 2

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

We [Quincy Wheelers] are passionate about preserving the existing network of 1,109 miles of motorized recreational opportunities within the PNF. On February 28, 2008 I wrote to the PNF at the Scoping for the Route Designation Program. I was not yet a Plumas county resident, but was pleased to have the opportunity to provide some GPS verification work for your team. During the 1st cut work program I observed the existence of four motorized routes designated "vehicle use restricted" shown to exist in the current PNF Forest Land Management Plan. The trails

bisect the Vehicle Use Prohibited Area that follows the north side of Highway 70 from Belden down to Tobin. These existing routes are of significant future importance. Presently our club has adopted Indian Springs Trail (6E06), as shown on the September 1999 edition of the Lassen Forest - Almanor Ranger District - "High Lakes" Recreation Map http://www.friendsofhighlakes.com/maps/highlakes_big.jpg . The route up the Indian Springs Trail (6E06) from Highway 70 is clearly depicted as a double dashed 2WD route.

Response

This is a non motorized trail in an Inventoried Roadless Area and could never have been used for 2WD vehicles except motorcycles.

Comment 3

Action: Volunteer Groups and Partnerships

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The trail [6E06] has fallen into disrepair from its former capacity since the Storrie Fire of 2000. Our club has adopted the Indian Springs Trail mileage within the Lassen National Forest (LNF) and we have restored the trail to a point within 1.5 miles of the PNF/LNF boundary under the volunteer agreement between Friends of the High Lakes and the LNF. We [Quincy Wheelers] hope to participate in restoration activities during the 2009-2010 spring and summer seasons. It is essential that these existing trails be preserved for present and future generations as well as future firefighting operations and/or Fire Safe projects.

Comment 4

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Our [Quincy Wheelers] frustration with the Travel Management Program is that the California OHV community has contributed nearly 13 million dollars to aid the Region 5 Forests into a legally sustainable posture and compliance with the legislative intent of Congress. What have we achieved so far with all this effort together with our local user funds on top of other public tax funds expended? 1,109 miles of previously un-inventoried routes in use are now inventoried. Cross-country travel by motorized vehicles is now prohibited in the PNF. From our perspective, great strides have been made. Is it not possible that we have reached the core intent of the concerns raised five years ago by Chief Bosworth? Are we now entering the paralysis by analysis phase of the project? I submit to you we have established a body of prima facie evidence, that within the Plumas National Forest, the previously unmanaged is now managed. It is not a perfect world. Let's move forward with the goal of attaining Assistant Chief Jim Pena's objective of producing a legally sustainable document. History shows extremists will sue regardless of the science in order to obstruct new projects (witness the dismal failure of the eight year "collaborative" effort by the Herger-Feinstein Quincy Library Group). We are using existing trails. You are actively managing presently.

Comment 5

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I do need restate my principle concern, namely that the lack of review and data compilation of 800 miles of the user-funded inventory project used to identify existing motorized routes on the ground proposed for closure/decommissioning is not acceptable. This is especially important since the fires and snow have precluded any reasonable opportunity to participate in verification and assessment as stakeholders. These trails, which have become established over nearly a century use, evolved in the light of day within a previously open forest. Reducing recreation opportunity is a serious matter that is un-quantified and unanalyzed in the DEIS. We motorized recreationists fully appreciate the significance of lost recreation opportunities. We [Quincy Wheelers] also know the PNF appreciates the value of lost opportunity by the accepting the $52 million settlement award from the railroad resulting from lost recreation opportunity arising due to the 2000 Storrie Fire.

Comment 6

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Forest Order No. 18-08 signed by Forest Supervisor Carlton on November 24, 2008 (prohibiting motor vehicle cross-country travel) brought PNF OHV recreation in the Plumas National Forest from being "unmanaged" into a "managed" status. The entire impetus for the route designation/travel management regulatory regime was approved by Congress on the strength of former Chief of the Forest Service, Dale Bosworth's impassioned Four Threats "road show" presented on Earth Day 2004. At that time the Four Threats were presented in order of priority with OHV recreational use ranked as fourth. For this reason we believe either Alternative 1 with the Forest Order18-08 in place, or the SAC Alternative 6 are the only reasonable Alternatives from the point of view balancing all forest recreation opportunities as well as the forest resource protection.

Comment 7

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Locally, we [Quincy Wheelers] are blessed with a great diversity of recreational opportunity (both motorized and non-motorized). Recreation is of great importance to both our local economy and our collective sanity. Our great state is home to the 2nd largest contiguous National Wilderness Protection System (NWPS) complex in the lower 48 states (central California Sierra region) totaling 2,241,439 acres. This should be sufficient for those who despise motorized trails and carbon emitting vehicles. We urge you to step away from the draconian impacts to the motorized recreation community that will result from the adoption of Alternatives 2, 3, 4 or 5.

Comment 8

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Our National Forests are our public lands (remember, the king of England drove us here – this is not the king's forest). Surely those vast areas within California's northern Sierra forests presently designated as wilderness and protected by the NWPS provide the able-bodied (and the so inclined) in need of the solitude provided by NWPS designated lands sufficient opportunity to recreate.

Thank you for your diligent efforts to assure the citizens have reasonable recreation access to their Public Lands as well as assuring that people have a place in the "Human Environment".

Letter 251

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Comment on errors and omissions in the water and soil evaluation report for the Plumas National Forest Draft Environmental Impact Statement for travel management.

Reduced erosion and the subsequent reduction of sediment delivery are beneficial to watershed health. Page 34 of the Plumas National Forest, Soil & Water Evaluation state shows how the goal of watershed health affects the selection of an alternative.

"For the remaining 10 watersheds, the effects of Alternative 2 on watershed resources would also be beneficial, including improved surface water runoff timing and magnitude and reduced sediment delivery as a result of decreased road / route density. "

Watershed health is a key goal for the PNF travel management decision. We must be confident that the Soil and Water analysis is complete and accurate, to be assured that the decision maker has the correct basis for the decision. The DEIS decision for route designations relies on the incomplete and inaccurate SWER [Soil and Water Evaluation] analysis of how motorized routes affect erosion and watershed health. The errors in the SWER have contributed to an erroneous decision in the DEIS. If the SWER analysis had been done correctly, the alternatives would have been written differently and the decision would have been different. The errors in the SWER are not minor, or a matter of a few isolated details. There are fundamental errors of methodology and assumption that permeate the entire analysis.

Comment 2

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The SWER [Soil and Water Evaluation] analysis fails to use Best Available Science because it analyzes routes only for length, with no regard for their width. The omission of route width means there is no computation of the surface areas of the routes being evaluated. Standard calculations of erosion and sediment delivery depend on the amount of surface area. Surface area cannot be calculated without knowing the width of the route. Two examples of Best Available Science are provided. First are simple formulas from the USFS's own WEPP Soil Erosion Modeling Software. The second example is a 2003 watershed improvement project in Central California. The goal of watershed improvement is met by a variety of actions, which include reducing roads to trail width for the stated purpose of reducing erosion. This demonstrates the simple and well known truth that narrower routes produce less erosion.

Response

The "Field survey methodology" section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Information regarding the USDA Water Erosion Prediction Project (WEPP) model has been added to section 3.5.3.1. The WEPP component for roads does, indeed, incorporate a direct relationship between the width of a road and the amount of erosion leaving the road prism (i.e., in comparing one road that is twice as wide as another road, the amount of eroded material leaving the wider road prism is predicted to be twice the amount of erosion from the narrower road). WEPP modeling is not part of the analysis methodology for trails proposed by this project because field surveyors focused on observing, for each route proposed, whether route drainage was effectively dispersed, whether erosion occurred, and whether erosion entered stream channels rather than on collecting the extensive fill slope and buffer length and gradient data necessary to run the theoretical WEPP model.

Comment 3

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The SWER [Soil and Water Evaluation] uses a Hidden Width Variable which Wrongly Forces Route Density to Exceed The 12% Allowed Surface Occupancy. The discussion addresses the inconsistencies, contradictions, hidden assumptions and lack of disclosure in the threshold calculations for the OHV routes.

Response

Nowhere in the cumulative effects analysis of section 3.5 is it stated that the route density for any of the alternatives exceeds 12% of an analysis watershed area. The cumulative effects methodology has been clarified in section 3.5.4. The changes in ERA percentage values presented in Appendix E of the Soil and Water Resource Report, and the assigned threshold of concern for each watershed presented in Table 23, are reported only to describe existing condition.

Comment 4

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The SWER [Soil and Water Evaluation] does not provide analysis consistent with the formulation of Alternatives or the Travel Management decisions. The Travel Management Rule requires the designations be made by class of vehicle. The DEIS categorizes all route type by vehicle class. Routes for each vehicle class are defined by their width, but the SWER does not analyze by route type, vehicle class or width. All routes are lumped together. The SWER analysis does not differentiate between motorcycle trails, 50 inch (ATV) trails and roads for full sized vehicles. The alternatives offer different combinations of the three route types, but the SWER analysis does not provide any information to explain why the alternatives were designed the way they are.

Response

The “Field survey methodology” section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route’s drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Comment 5

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The SWER [Soil and Water Evaluation] makes erroneous statements about re-vegetation and recovery of route surfaces based on an incorrect assumption about the scope of Travel Management decisions.

Response

Passive recovery effects on existing, unauthorized routes due to prohibition of motorized travel are described in the direct / indirect effects portion of section 3.5.6.2.

Comment 6

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.4

The SWER [Soil and Water Evaluation] fails to analyze the entire Affected Environment as described in the DEIS. The SWER omits approximately two-thirds of the inventoried unauthorized routes disclosed in the DESI. Therefore the SWER conclusions for Cumulative Effects are incorrect. The SWER makes the conscious decision to disregard width even though the information is provided in the DEIS. The DEIS clearly and repeatedly tells us how many miles there are of each type of route, both the authorized and the unauthorized routes.

Response

Field surveys and soil and water resource effect ratings were only performed for the existing, unauthorized routes that are proposed for addition to the NFTS under action alternatives 2 – 5. However, all known unauthorized routes are included in the motorized road and route density indicator used for cumulative effects analysis. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects.

Comment 7

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Appendices F, G and H of the Soil and Water Resource Report

There is no data presented that OHV tecreation on the authorized and unauthorized routes is causing any negative impacts to watershed health. There are statements of no impact.

Response

The full length of each proposed trail was field surveyed. Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in Appendices F, G and H of the Soil and Water Resource Report.

Comment 8

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Failure to Use Best Available Science

Every school child is taught simple geometry. Draw a rectangle, and length times width equals the area. Erosion from a road or trail is a function of the exposed soil area. If you don't use the width of a road, you can't calculate the road's area and you can't analyze the erosion from the road. But this is exactly what the SWER does. The SWER [Soil and Water Evaluation] discussion and analysis of routes is based exclusively on lengths (miles) and totally omits widths.

Example 1: The importance of the width variable is demonstrated in this example from a WEPP technical document. WEPP is the soil erosion modeling and simulation software tool developed by the Rocky Mtn. Research Station of the USFS. Below are quotes from the WEPP Technical document at http://forest.moscowfsl.wsu.edu/fSWERp /docs/wepproaddoc.html (Note: the online document has no page numbers)
Here is how the document describes WEPP:

"WEPP: Road is an interface to the Water Erosion Prediction Project (WEPP) soil erosion model that allows users to easily describe numerous road erosion conditions."

WEPP erosion formula given below shows that the sediment yield is a function of three variables: width, length and slope. Remove any one of those variables, and the sediment yield can't be calculated. The formulas are useless without the Width variable.
The effective length (figure 2) of the flow path over the road surface is:
Effective Length = Road Width X Effective Slope/ 4 percent
In order to maintain the correct total road surface area, an effective width of the element is then calculated as
Effective Width = (Road Length x Road Width) / Effective Length

WEPP: Road was used to model erosion in the Smoky Canyon Mine Panels F & G Draft Environmental Impact Statement. The two quotes are from page 4, Appendix A, at http://www.fs.fed.us/r4/caribou-targhee/phosphate /smoky_canyon_mine/Final%20Appendices/Appendix%204A.pdf. Emphasis added to show the importance of WIDTH in erosion analysis.

Seyedbagheri (1996) reported that road size (width, cut/fill lengths, volume of material) affects both unit erosion rate and transport distance.

For this analysis, the specific inputs to the WEPP: Road module were determined based on the following sources:

Chapter 2 road design information (road width, fill slope gradient, surfacing; and road shape/ditch configuration); conceptual design road footprints provided by Simplot (fill slope length and road gradient); soil mapping (USDA 1976; USDA 1990) (to place individual reaches in one of four soil categories allowed by the model); and topographic mapping (buffer length and slope). Model iterations were made over a 15-year period to represent the approximate life of these roads, but it is generally shown that the first year or so after construction represents the greatest erosion potential (Ketcheson and Megahan, 1996). The same climate parameters that were used in Disturbed WEPP were used for WEPP: Road.

The Canyon Mine example tells us (again) that you can't discuss road design and erosion without analyzing the road's surface area.

Example 2: Summary of the Proposed Watershed Protection Program
EL CORTE DE MADERA CREEK OPEN SPACE PRESERVE
http://csc-s-maps-q.csc.noaa.gov/salmonid/html/water/descrip/pdf/sangreg/elcorte.pdf

Page 1:
El Corte de Madera Creek Open Space Preserve encompasses 2,788 acres in the upper headwaters of the San Gregorio Creek watershed. This watershed provides critical habitat for steelhead trout and coho salmon, both federally threatened species on California's Central Coast. These fishes have experienced dramatic population declines due to water diversion projects and from sedimentation associated with road construction, mining, grazing, and timber harvesting. San Gregorio Creek has been listed as "sediment-siltation impaired" under the Clean Water Act, and is under the regulatory authority of the San Francisco Bay Regional Water Quality Control Board to protect water quality.

This Central California project proposes actions to reduce sediment and improve the watershed and water quality. Those actions include the following item (page 1,emphasis added):

Narrowing road widths to the minimum necessary for patrol, emergency response, and maintenance activities, thus reducing the overall surface area exposed to the weathering and erosive effects of rainfall. Trails proposed for narrowing are portions of El Corte de Madera Creek, Fir, Tafoni, Lawrence Creek, and, optionally, Virginia Mill and Spring Board Trails.

(Roads) proposed for conversion to trail-width will be reduced to approximately 4-foot width to accommodate ATV travel

The El Corte project proposes to make routes narrower routes as a corrective measure to reduce erosion. This also shows why the Plumas SWER makes a very serious error when it omits any discussion of widths and surface area, and proceeds to analyze all routes as if they are the same width.

Response

The "Field survey methodology" section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Information regarding the USDA Water Erosion Prediction Project (WEPP) model has been added to section 3.5.3.1. The WEPP component for roads does, indeed, incorporate a direct relationship between the width of a road and the amount of erosion leaving the road prism (i.e., in comparing one road that is twice as wide as another road, the amount of eroded material leaving the wider road prism is predicted to be twice the amount of erosion from the narrower road). WEPP modeling is not part of the analysis methodology for trails proposed by this project because field surveyors focused on observing, for each route proposed, whether route drainage was effectively dispersed, whether erosion occurred, and whether erosion entered stream channels rather than on collecting the extensive fill slope and buffer length and gradient data necessary to run the theoretical WEPP model.

Comment 9

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The SWER [Soil and Water Evaluation] uses a Hidden Width Variable which Wrongly Forces Route Density to Exceed The 12% Allowed Surface Occupancy.
The SWER states that the Plumas NF uses a watershed Threshold of Concern which is 12% of the surface area.

The SWER describes the methodology used by the Plumas NF to assess Threshold of Concern for CWE in watersheds, and the threshold it uses to evaluate OHV routes. The discussion addresses the inconsistencies, contradictions and lack of disclosure in the threshold calculations for the OHV routes. The TOC. is described at pages 22-23

Cumulative Watershed Effects (CWE) from these vegetation projects are closely controlled by assuring that the resulting ERA model outputs for the project watersheds, when expressed as a percentage of total watershed area, do not exceed the prescribed Threshold of Concern (TOC). Predominately, the TOC for Plumas NF watersheds is prescribed to be 12 percent of the watershed area.

The Threshold of Concern (TOC) is reached when over 12 percent of watershed area is disturbed. A different standard for Threshold is devised for motorized routes; given as a maximum allowed route density of 4 miles of route per 1 square mile of surface area. The SWER states that 4 miles of route per square mile of area is the road/route density threshold of watershed damage.

How does the OHV route density threshold of 4 miles per square mile relate to the 12%? The 4 miles/sq. mile formula has no variable disclosed for width. But there is a width variable buried in the formula. The underlying and undisclosed assumption built into the threshold of 4 miles per square mile is that all routes are the width of two lane roads. This is in direct contradiction to what is presented in the DEIS and the Alternatives, which say that some routes are roads, some are 50 inches, and others are less than 50" inches (the motorcycle trails).

Here is how to understand the width variable which is hidden in the SWER formula of 4 miles per square mile: We will calculate how many miles of route must be present in a square mile, in order for the total roaded area to exceed 12% of the square mile. We want to find the 12% surface occupancy, because that is the Threshold of Concern the Plumas uses for watershed. We will test different assumptions of width.

Take 4 miles of 'route', and assume it is 25 feet wide. 4 miles equals 21,120 linear feet. Now multiply that by a 25 foot width. 21,120 x 25 = 528,000 sq. ft. There are 528,000 square feet in a segment of road that is 4 miles long and 25 feet wide. Now consider the square mile of land. 5280 x 5280 = 3,062,400. This means there are 3.06 million square feet in a square mile. Now divide 528,000 sq ft of route by 3,062,400 of land. The result is 0.17. This tells us that 4 miles of route which is 25 feet wide occupies 17% of the land. This is in excess of the allowed 12%. Repeat this for a 17 ft wide road. A 4 mile segment of 17 ft wide road contains 359,040 sq. ft. Dividing that by 3,062,400 gives us That gives us 11.7% surface occupancy. We have found the hidden width assumption. The SWER assumes every mile of route is 17 feet wide, no matter if it is road, ATV trail or motorcycle trail. Assuming 17 ft width, any combination of routes adding up to 4 miles per square mile occupies 11.7% of the surface area of a square mile. That is right up against the 12% mark which sets off the Threshold alarm.

Now repeat the exercise for a 50 inch ATV track. Let's round it up to 5 feet wide for ease of calculation. 4 miles of 5 foot wide ATV track occupies 105,600 sq. ft of surface area. Dividing that by 3,062,400 gives you 0.03. That means 4 miles of ATV route occupies only 3% of the surface area of the square mile. Let's do it again for a motorcycle trail, assuming it is 3 feet wide to allow for the handlebar clearance between trees. 4 miles of motorcycle trail occupies 63,360 sq. ft. of surface area. Dividing 63,360 by 3,062,400 gives you 0.02. This means that 4 miles of motorcycle trail occupies only 2% of the surface area of a square mile.

The route density assumptions and conclusions of the SWER are not only wrong, they are wrong by orders of magnitude. It would take 24 miles of motorcycle trail in one square mile to have the trails take up 12% of the square mile. This means that for motorcycle trails, the Threshold should be formulated as 24 miles of trail per square mile of area. For ATV trail 5 ft wide, it would take 16 miles of trail to cover 12% of a square mile. This means the Threshold for ATV trail should be formulated as 16 miles of trails per square mile of area.

Here is an example of how the faulty density calculations become wrong statements in the DEIS itself. The following is from p 95 of the DEIS:

For the two watersheds with the greatest increase in past ground disturbance from 1999–2007, watersheds 110041 and 110192, Alternative 3 would produce significant reductions in road/route density, resulting in densities of 2.93 and 1.75 mi/mi2, respectively. Alternative 3 would add no new trails to the NFTS and would prohibit motorized traffic and allow for the passive restoration of 7.1 and 23.1 miles of routes (respectively) that currently exist in these watersheds. None of the reasonably foreseeable actions presented in Appendix C are proposed within these two watersheds.

For the two watersheds that were determined to have a high risk of CWE in the 1999 HFQLG S, watersheds 110114 and 110159, Alternative 3 would produce significant reductions in road/route density, resulting in densities of 3.96 and 2.68 mi/mi2, respectively.

The claimed reduced in road/route density is not significant if the routes under examination are motorcycle and ATV trails. The critical watersheds could have 10 miles per mile of motorcycle trails, and 8 miles per mile of ATV trails, and still be well under 12% Threshold of Concern. We see here that the DEIS repeats the SWER's misunderstanding of the Travel Management Rule. There is NO passive restoration from banning OHV use because all the non-motorized users are still allowed on the trails. The decision only closes the use of the route to motor vehicles; it DOES NOT close the route itself. It is quite alarming the draft EIS for a Travel Management decision doesn't even understand the basics of the Travel Management Rule.

Response

The cumulative effects methodology has been clarified in section 3.5.4. The changes in ERA percentage values presented in Appendix E of the Soil and Water Resource Report, and the assigned threshold of concern for the watershed presented in Table 23, are reported only to describe existing condition. Section 3.5.4 recognizes that the total area of motorized routes in a watershed, and the area of existing unauthorized routes, comprise a small and likely insignificant fraction of the TOC. The effect of greatest concern to watershed condition is not the area disturbed but, rather, the general effect of motorized roads and trails concentrating natural runoff patterns and often channeling runoff to a point that leads to excessive erosion of the route and adjacent landscape. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the

watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

The density of proposed roads and trails open to motorized traffic, not disturbed area in relation to TOC, is used as the indicator for cumulative watershed effects of the project alternatives. For all action alternatives (2-5), the cumulative effect to watershed condition, at the analysis watershed scale, is stated to be beneficial.

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

What is the Actual Percentage of Forest Surface Occupied by Unauthorized Roads and Trails? Is Proliferation of Unauthorized Routes a Serious Problem?
The DEIS and the SWER [Soil and Water Evaluation] never asks what percentage of the surface area is occupied by roads and trails. The percentage amount of the forest surface which is occupied by the trails is so tiny; the Forest could not plausibly argue they have any significant impact. At page 84, the DEIS summarizes the mileages in the No Action Alternative. There would be 5,027 miles of existing roads and routes. Of those, 1,109 miles are the inventoried unauthorized routes.
Page 2, DEIS:

The Plumas National Forest has 999,521 acres currently open to cross-country travel by motor vehicles. In 2005, the Plumas National Forest completed an extensive inventory of unauthorized routes on NFS lands open to cross-country travel as described in the MOI. Approximately 1,109 miles of unauthorized routes were identified.

The existing NFTS is described at page 6:

The PNF currently manages and maintains approximately 4,137 miles of NFTS roads and 123 miles of NFTS motorized trails.

Page 15 of the DEIS says this:

Over 1,109 miles of unauthorized routes would receive continued use. Of these, approximately 725 miles are suitable for all vehicles, 159 miles are 50" or less in width and 225 miles are suitable for motorcycles only. Routes would continue to proliferate.

We shall put these pieces together to get a true picture of the overall situation concerning route density and proliferation of trails and roads over the entire life of the Plumas National Forest.

The total mileage of routes (authorized and unauthorized) is as follows:
4,137 miles of NFTS roads and 725 miles of unauthorized roads. Total Road Mileage= 4,862
123 miles of NFTS motorized trails and 384 miles of unauthorized trails. Total Trail Mileage = 507

Over the entire past history of the Plumas, when cross country travel has been permitted, only 725 miles of unauthorized road, and 384 miles of unauthorized trail have come into existence.

Here are the calculations: 384 trail miles = 2,027,520 linear feet of trail. Round that to 2 million. The Plumas is 999,521 acres. Dividing that by 640 acres (acres per square miles), we determine that the Plumas is 1562 square miles. Assume that all trails are 5 ft wide. The surface occupied by unauthorized trails is 5 x 2 million, or 10 million sq. ft. A square mile (5280 x 5280) contains 3,062,400 square feet. So the Plumas contains 4783,468,800 square feet. We'll round that to 4783 million square feet. Divide 10 million by 4783 million, and the results tell us that the unauthorized trails represent 0.002, or two tenths of one percent of the entire forest surface. In reality the percentage is far smaller since over half the trails are for motorcycles and less than 5 feet wide,

Assuming road width of even 20 feet, the area occupied by 725 miles of unauthorized road is 77 million square feet of road. Divide by 4783 million, the resulting number of 0.016 tells us that in the entire life of the forest, with cross country travel allowed, the amount of unauthorized roads which have developed amount to 1.6%, that is shade over one and a half percent of the surface area.

The claims of route proliferation certainly look foolish in the face of real numbers. Motorized cross country use has been permitted over the entire life of the forest. Even so, the surface area occupied by unauthorized trails is only two-tenths of one percent. The surface area occupied by unauthorized roads is only 1.6%

Response

The cumulative effects methodology has been clarified in section 3.5.4. Section 3.5.4 recognizes that the total area of motorized routes in a watershed, and the area of existing unauthorized routes, comprise a small and likely insignificant fraction of the TOC. The effect of greatest concern to watershed condition is not the area disturbed but, rather, the general effect of motorized roads and trails concentrating natural runoff patterns and often channeling runoff to a point that leads to excessive erosion of the route and adjacent landscape. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

As described in section 3.5.6.2, for Alternative 2 – and for all action alternatives (2-5) - the cumulative effect to watershed condition at the analysis watershed scale would be beneficial as a result of passive recovery of unauthorized routes currently open to motorized traffic, mitigations performed on routes added to the NFTS, and protection of areas that are currently untracked. The analysis recognizes that the addition of unauthorized routes to the NFTS as trails would not increase the percentage of land disturbed and would not increase adverse effects to soil and water resources over existing levels because these routes already exist on the landscape. Unlike alternatives 3, 4 and 5, the analysis states that adverse soil and water effects would exist at a site-specific scale for alternative 2 because 51 miles of trail proposed are rated "Extreme," meaning that those adverse effects cannot be feasibly mitigated and would persist in the future.

Comment 11

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The SWER [Soil and Water Evaluation] does not provide analysis consistent with the formulation of Alternatives or the Travel Management decisions.
The SWER has no definitions, discussions or descriptions of vehicles classes and the width of different route types. This is inconsistent with the Travel Management Rule which says the decision must designate by vehicle types. The alternatives in the DEIS comply with the Travel Management and differentiate the routes by vehicle type. But the SWER does not analyze the routes by vehicle type. Width is the only criteria used in the DEIS for differentiating between the route types. The three route types in the DEIS are full-sized road, 50" route (ATV width) and motorcycle width (narrower than 50"). Despite the importance of 'WIDTH" in Travel Management, the entire SWER analysis is done with no differentiation between the three types of routes. In the Travel Management Rule (36 CFR Parts 212, 251, 261, and 295), Section § 212.56 'Identification of designated roads, trails, and areas' makes this statement:

"The motor vehicle use maps shall specify the classes of vehicles and, if appropriate, the times of year for which use is designated."

In [section] 212.1 Definitions, the Travel Management Rule clearly differentiates between the types of routes. Note that all references are phrased as 'roads OR trails'. All designations must be as a road, a trail, or an area.

Designated road, trail, or area. A National Forest System road, a National Forest System trail, or an area on National Forest System lands that is designated for motor vehicle use pursuant to [section] 212.51 on a motor vehicle use map.

Forest road or trail. A road or trail wholly or partly within or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the National Forest System and the use and development of its resources.

The SWER analysis provides no rationale for comparing the alternatives, which each have different amounts of each type of route. This is a critical omission which makes the SWER conclusions essentially useless. There is no logical connection between the SWER analysis and the alternatives which include varying miles of the three route types. The Travel Management Rule says "Tell us how many apples, how many pears and how many bananas you have." Alternatives describe different combinations of 'apples, pears and bananas'. But the SWER only talks about 'fruit'.

Response

The "Field survey methodology" section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Comment 12

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The SWER [Soil and Water Evaluation] makes erroneous statements about re-vegetation and recovery of route surfaces based on an incorrect assumption about the scope of Travel Management decisions.
The following statement from page 30 of the SWER describes the beneficial effects of re-vegetation on the 'former route surface'.

Page 30:
"However, the long term establishment of vegetative growth on these routes will somewhat reduce area peak flows. More significantly, this vegetation will substantially decrease the amount of erosion from these areas and the amount of sediment delivered to area stream channels. The vegetative canopy will intercept precipitation and significantly reduce detachment of soil particles from the former route surface due to rain splash erosion. Stems that grow on the route surface will intercept surface runoff, slowing and lengthening the runoff flow path to reduce the occurrence of concentrated runoff that generates erosion. Roots of vegetation that re-grows on these routes will act to hold vast areas of soil in place. Re-established vegetation will transpire a significant portion of precipitation that formerly ran down and off the road surface. "

The SWER makes this entirely wrong statement that routes not designated for OHV use will re-vegetate after 25 to 30 years, and the re-vegetation of the surface will stop the erosion from a bare surface. The reality is that the Travel Management decision, no matter what it is, will leave ALL existing routes of every type, authorized and unauthorized, legally open to all non-motorized forms of use. This means the route surfaces will continue to be bare of vegetation, and will continue to generate erosion and sediment loading. This wrong statement also appears at page 23 of the SWER:

The prohibition of cross-country travel would reduce future land disturbance on the Forest and would allow passive recovery of unauthorized route that have already disturbed the landscape.

The mistake is made again at page 24:

For existing unauthorized routes that are not proposed for addition to the NFTS, it will be assumed that passive recovery of soil cover and the vegetative productivity of soils, with concurrent reductions in erosion and sedimentation from road surfaces, will occur over a 25 year period on the West side and 30 year period on the East side.

The SWER doesn't understand the Travel Management Rule. The decision only closes use of a route to a certain class of user. It does NOT close, decommission or obliterate the route itself, neither does it forbid any non-motorized use of the route. The SWER gives the decision maker conclusions based on the completely incorrect assumption that closing routes to OHV use will allow bare surfaces to re-vegetate. This could induce the decision-maker to select an alternative under the mistaken belief it will slow or even stop erosion. In addition, banning cross country travel by OHVs will not stop route proliferation since horse riders, hikers and mountain bikers will still be allowed to travel cross country.

Response

Passive recovery effects on existing, unauthorized routes due to prohibition of motorized travel are described in the direct / indirect effects portion of section 3.5.6.2. Relative to motorized traffic, the frequency of non-motorized traffic (hikers, bikers, and horse riders) would need to be dramatically higher in order to suppress the passive recovery effects of vegetative establishment. Isolated instances where such high-frequency, non-motorized use of routes not added to the NFTS would not substantially affect the road / route density indicator results used for cumulative watershed effects analyses of the project alternatives.

Comment 13

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The SWER [Soil and Water Evaluation] fails to analyze the entire Affected Environment as described in the DEIS. Page15 of the DEIS provides details for the miles of different widths of routes, under the No Action Alternative: This section states:

"The No-action Alternative provides a baseline for comparing the other alternatives."

It then provides these specifics:

Over 1,109 miles of unauthorized routes would receive continued use. Of these, approximately 725 miles are suitable for all vehicles, 159 miles are 50" or less in width and 225 miles are suitable for motorcycles only.

The DEIS clearly shows that the baseline information for existing routes includes the route type. However, the SWER completely ignores this, and all routes are analyzed as if they were the same. The SWER does not provide a different route density threshold for each type of route. All routes fall under the maximum threshold of 4 miles of route per square mile of area.

We know from the WEPP erosion formulas that roads have greater impacts than trails precisely because they are wider. Yet the SWER analysis treats a 3 ft wide trail the same as a 20 ft wide road. This is in direct contradiction to a statement in the SWER itself. Page 10 of the SWER acknowledges that it knows OHV trails are narrower than roads and that motorcycle trails are 'particularly' narrow:

"While the surveyed routes are proposed not as NFS roads but as NFS trails, the chief difference between these two types of NFS facilities is simply the width of the traveled way (OHV trails, particularly motorcycle trails are narrower than roads)."

Page 3 of the SWER makes this statement:

The proposed action alternatives could potentially affect soil productivity and its other ecosystem functions and is therefore addressed in this section.

However, the SWER does provide any understanding of the differences between the alternatives. The essence of the alternatives is that each one has a different mix of route types. The SWER doesn't analyze by route types.

Response

The "Field survey methodology" section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Information regarding the USDA Water Erosion Prediction Project (WEPP) model has been added to section 3.5.3.1. The WEPP component for roads does, indeed, incorporate a direct relationship between the width of a road and the amount of erosion leaving the road prism (i.e., in comparing one road that is twice as wide as another road, the amount of eroded material leaving the wider road prism is predicted to be twice the amount of erosion from the narrower road). WEPP modeling is not part of the analysis methodology for trails proposed by this project because field surveyors focused on observing, for each route proposed, whether route drainage was effectively dispersed, whether erosion occurred, and whether erosion entered stream channels rather than on collecting the extensive fill slope and buffer length and gradient data necessary to run the theoretical WEPP model.

Comment 14

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

There is no data Presented That OHV Recreation on the Authorized and Unauthorized Routes Is Causing Any Negative Impacts to Watershed Health. There are statements of No Impact.
There is no demonstrated relationship between OHV recreation and negative impacts on watershed health. We see at page 5 of the SWER, that there are only three streams in the entire PNF which are out of compliance with standards, and none of them are because of OHV use, or even from the presence of any route whether or not it is used by anyone, motorized or non-motorized. The impaired quality is caused by mine tailings, mercury, and temperature changes caused by dams and hydroelectric facilities:

This section requires the identification of water bodies that do not meet, or are not expected to meet, water quality standards or are considered impaired. The list of affected water bodies, and associated pollutants or stressors, is provided the State Water Resources Control Board and approved by the US EPA. The most current list available is the 2006 303(d) list (SWRCB, 2006). The Plumas National Forest has 3 streams listed: Dolly Creek and Little Grizzly Creek (both due to Walker Tailings) and the North Fork Feather River (mercury and temperature). The designation of routes to the NFS will not cause additional mine tailings or mercury to enter the stream course. The temperature concerns on the North Fork Feather River are due to the hydropower facilities and dams.

The following statement is at page 21 of the SWER. It brings the good news that the watersheds are in good shape. Not only that, they have been improving (emphasis added).

Data presented in the 2007 HFQLG FRA Pilot Project Monitoring Report to Congress for "Question 17: What is the effect of activities on indicators of watershed condition?" indicate that little change in watershed condition has occurred since 1999 (Table 1). The full 2007 report for Question 17 is found in the HFQLG Status Report to Congress Fiscal Year 2006 (USDA Forest Service 2007). Road density decreased approximately 2.0%, primarily due to obliteration of more than 80 miles of road implemented by Plumas National Forest staff. The number of road / stream crossings decreased by nearly the same percentage (a total decrease of 54 crossings), again due primarily to the obliteration of roads mentioned above. Near-stream road density decreased by 5.5%, a larger percent decrease than the total road density decrease because the road obliteration projects were focused on roads that contributed significant volumes of sediment to stream channels.

Page 1 of the DEIS repeats the boilerplate statements about damage from OHV:

California is experiencing the highest level of OHV use of any state in the nation. There were 786,914 All Terrain Vehicles (ATVs) and OHV motorcycles registered in 2004, up 330 percent since 1980. Annual sales of ATVs and OHV motorcycles in California were the highest in the U.S. for the last 5 years. Four-wheel drive vehicle sales in California also increased by 1,500 percent to 3,046,866 from 1989 to 2002. Unmanaged motor vehicle use,

particularly OHV use, has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites.

These generalized claims of unplanned road and trails causing erosion which degrades watersheds are contradicted by the data and studies in the SWER, which show there have been no significant impacts to watersheds over the past ten years, even though cross country travel has been allowed, and the number of vehicles has increased greatly.

Response

The Section 303(d) list of water bodies in section 3.5.2 identifies only the streams that are currently identified as impaired by the State Water Resources Control Board. Improvement and protection of these three streams alone would not constitute compliance with State of California administration of the Clean Water Act. Non-point source pollution from PNF NFTS facilities is managed through the Management Agency Agreement between the State Water Resources Control Board and USDA, Forest Service as described in Water Quality Management for Forest System Lands in California. The Plan relies on implementation of prescribed best management practices, including control of adverse soil and water effects from NFTS facilities. The full length of each proposed trail was field surveyed. Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in Appendices F, G and H of the Soil and Water Resource Report.

Comment 15

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

We want to identify critical omissions which result in an unreliable and erroneous Soil and Water Evaluation.

The Plumas NF SWER [Soil and Water Evaluation] does not discuss or recognize the importance of a baseline measurement for sediment loading in the watersheds. The Executive Summary for the Smokey Canyon Mine DEIS recognizes the significance of baseline data for sedimentation, and says this at page ES-8: (Emphasis added)

The Proposed Action Panel F Haul/Access Road sediment loading was 0.5 tons/year, and0.7 tons/year were estimated for Alternative 1 (Alternate F Haul/Access Road). These added sediment loads are less than 0.3 percent and 0.4 percent increases, respectively, over baseline sediment load (154.8 tons/year) in the South Fork Sage Creek watershed.

By omitting baseline data, the Plumas SWER makes the inaccurate assumption that all erosion and sediment loading comes from activities on the land. The SWER ignores the fact that erosion comes from the land itself; it is a natural process which is always occurring, even in areas with no routes. The lack of site specific baseline data in the SWER results in an undisclosed assumption that the analysis treats all watersheds as if they are the same, and would have the same baseline sediment load. This is obvious untrue. Each watershed has its own unique 'fingerprint', a combination of factors which affect transport and sediment loads: different acreages, slopes, soil types, drainage configurations, pattern of roads and trails, other existing activities and uses (timber harvest, grazing) and past history of mining and fires which creates more exposed soil surface.

Response

Erosion rates vary substantially from year to year, primarily due to wide variations in precipitation and runoff patterns. Site specific monitoring and analysis of the actual yearly erosion magnitude occurring on all routes proposed for addition to the NFTS is well beyond the capacity of PNF staff and budgets and is not required by the State Water Resources Control Board per Water Quality Management for Forest System Lands in California (section 3.5.2 of the FEIS). All routes rated as "High" or "Extreme" (routes with existing adverse impacts) were field visited by a PNF hydrologist. Natural erosion processes associated with slope, soil texture, and precipitation for each project watershed were considered in the field by the hydrologist in assessing the observed sediment delivery impacts associated with proposed trails. Information has been added to the "Soil and water quality monitoring" section of chapter 2. This information describes water quality standards, the amount of acceptable change, and baseline water quality for normal conditions.

Comment 16

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

We want to identify critical omissions which result in an unreliable and erroneous Soil and Water Evaluation.
The Plumas NF SWER [Soil and Water Evaluation] makes no mention and does not account for erosion and sediment

loading created by other users on the routes used by OHVs. All routes used by OHVs, both authorized and unauthorized, are also legally used by every other mode of travel: foot, bicycle and horse. The SWER makes the undisclosed assumption that all erosion on a route is caused by OHV use. This invites the erroneous decision that reducing or eliminating OHV use will 'solve' erosion.

Response

The full length of each proposed trail was field surveyed. Route-specific summaries of field survey information and soil and water effects are presented in Appendices F, G and H of the Soil and Water Resource Report. Adverse ratings for soil and water effects generally resulted from direct observation of route-generated erosion entering stream channels, regardless of whether the route is used by motorized or non-motorized traffic. Passive recovery effects on existing, unauthorized routes due to prohibition of motorized travel are described in the direct / indirect effects portion of section 3.5.6.2. Relative to motorized traffic, the frequency of non-motorized traffic (hikers, bikers, and horse riders) would need to be dramatically higher in order to suppress the passive recovery effects of vegetative establishment.

Comment 17

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Section 3.5.5.1

We want to identify critical omissions which result in an unreliable and erroneous Soil and Water Evaluation. The SWER [Soil and Water Evaluation] provides no detail for climate data, particularly for the frequency, season, duration, and force of rainstorms which are the primary movers of soil.

Response

A description of climatic conditions in the FEIS project area is presented in the section 3.5.5.1 of the Affected Environment portion of section 3.5.

Comment 18

Action: Adequacy of Studies (Best Available Science)

Resource(s): Soil Resources

Disposition: Resolved: Already addressed in planning documents (SEE CITATION)

Citation: Sections 3.5.4 and 3.5.6.2

We want to identify critical omissions which result in an unreliable and erroneous Soil and Water Evaluation. The Plumas SWER [Soil and Water Evaluation] does not even mention, let alone account for, other erosion causing activities which are present continuing into the future. Example: The Schedule of Proposed Actions for April 2007 through June 2007 includes the following projects which clearly have impacts on erosion and sediment loading. Do these projects create erosion and sediment loading? The SWER doesn't say, and doesn't disclose the Plumas's own activities which add to erosion. The SWER does not disclose whether erosion impacts are cumulative from various permitted activities, some of which like grazing have been going on for decades. The cause of erosion is certainly hard to analyze when there are multiple sources. But the SWER should at least recognize there are multiple activities in watersheds which all contribute to erosion and sediment loading issues. Since each of these activities required a NEPA process, the SWER could have at the least provided a survey of existing soil & water effects as documented for each project. But instead the SWER analysis makes the undisclosed assumption that OHV use of existing routes is the sole cause of all existing erosion and sediment issues.

Response

See sections 3.5.4 and 3.5.6.2. Past actions, including grazing activities, are represented by the existing condition of PNF watersheds. The existing condition of PNF watersheds is represented by the watershed condition sensitivity rating and risk of cumulative watershed effects from the 1999 Final EIS for the HFQLG Forest Recovery Act, with further indication of the condition provided by results from the 2008 HFQLG FRA Pilot Project Monitoring Report to Congress. The 2008 Monitoring Report to Congress indicates that watershed condition, when analyzed at the scale of the HFQLG FRA watersheds, has changed little since the 1999 HFQLG FEIS analysis. The largest cumulative effect of future actions to watershed condition will result from HFQLG FRA projects. These projects are not expected to increase a watershed's total ERA over the threshold of concern. For all action alternatives (2-5), the cumulative effect to watershed condition, at the analysis watershed scale, is stated to be beneficial.

Comment 19

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Categorical Exclusions and Environmental Assessments for grazing management areas. Frenchman Lake Allotment, Area 1 Range. Does OHV recreation exist in these areas? What impact is the grazing having on watershed and water quality? The SWER [Soil and Water Evaluation] does not even mention there is grazing on the Plumas, an activity well known to have watershed impacts. The statements of Cumulative Impact do not include the widespread and varied non-OHV activities on the forest. These activities contribute to the impacts on watershed quality.

Response

See sections 3.5.4 and 3.5.6.2. Past actions, including grazing activities, are represented by the existing condition of PNF watersheds. The existing condition of PNF watersheds is represented by the watershed condition sensitivity rating and risk of cumulative watershed effects from the 1999 Final EIS for the HFQLG Forest Recovery Act, with further indication of the condition provided by results from the 2008 HFQLG FRA Pilot Project Monitoring Report to Congress.

OHV recreation use does exist in the analysis watersheds containing the Frenchman Lake Allotment. Cumulative watershed effects for grazing allotment analyses referenced in the Appendix C of the FEIS are not expected to increase beyond existing levels and are not expected to exceed the threshold of concern. For all action alternatives (2-5), the cumulative effect to watershed condition, at the analysis watershed scale, is stated to be beneficial.

Comment 20

Action: Cumulative/Combined Effects

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Environmental Assessments for the Graz Project and the Happy Jack DFPZ/WUI Project. Defensible Fuel Profile Zone (DFPZ), Group Selections (GS) and Individual Tree Selection (ITS). Defensible zones mean tree removal, which might require new roads and has erosion impacts.

Categorical Exclusions for
Grease Fire Salvage. This project will salvage 213 acres of trees as a result of the 350 acre Grease Fire.
Brush Creek DFPZ project. Removal of dead trees from prescribed burning units.
Kellerman Fuel Reduction
La Porte Pines Hazardous Fuels Reduction
Port Wine Clustered Lady's Slipper Orchid Prescribed Fire Study
Soapstone Hill Bear Grass Restoration and Management, Prescribed Fire
Hungry Post-Fire Salvage and Reforestation Project

EIS for Sugar and Strawberry Etals: Construction of fuel breaks (defensible fuel profile zones or DFPZs) on approx. 2,000 acres; group selection timber harvest on approx. 1,000 ac; and individual tree selection on approx. 300 ac. For purposes of watershed management, fuels management, species issues for fish, wildlife, rare plants.

All of these actions, events and projects are part of the Affected Environment and the Cumulative Effects, but they are omitted from even cursory discussion in the SWER [Soil and Water Evaluation].

Response

See section 3.5.6.2 and Table 23. The largest cumulative effect of future actions to watershed condition will result from HFQLG FRA projects such as the fuel reduction projects mentioned in your comment. These projects are not expected to increase a watershed's total ERA over the threshold of concern. Information has been added to section 3.5.4 regarding proposed salvage projects listed in Appendix C of the FEIS. Modeling for these projects typically indicates that the management activities would result in additional ground disturbance, but the additional ERA total is a small fraction of the ERAs that were added as a result of the fire. Watershed effects attributed to wildfire are typically short-lived as brushy vegetation quickly establishes effective ground cover within 2-3 years. At the analysis watershed scale, the cumulative effect to watershed condition of all action alternatives (2-5) would be beneficial as a result of passive recovery of unauthorized routes currently open to motorized traffic, mitigations performed on routes added to the NFTS, and protection of areas that are currently untracked.

Letter 252

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Other (SEE RESPONSE)

The Forest Service travel management planning process in California has not promoted collaborative engagement with local jurisdictions or the public. Forest Service policies will significantly reduce motor vehicle access in the national forests.

FS regional policy regarding motorized mixed use in California supersedes national FS policies and State traffic law. The Region's policy will restrict non-highway legal vehicle travel on thousands of miles of existing national forest system roads.

Background: Existing regional direction to all the Forest Supervisors in California allows motorized mixed use only on national forest system (NFS) roads currently maintained for high clearance vehicles where passenger car traffic is discouraged (letters dated 8/21/06, 6/20/07, 3/27/08, 9/8/08 and 1/13/09). This equates to only maintenance level 2 roads being available for mixed use. These roads are generally short, dead end spur roads. The Regional Forester cites the California Vehicle Code as the reason for prohibiting non-highway legal OHVs on NFS passenger car roads with a maintenance level (ML) of 3, 4 or 5. There are 8,903 miles of ML 3, 4 and 5 roads in California, most of which are unpaved. This represents 21.5 percent of all NFS road miles in Region 5. Many of these roads have been safely used by OHVers for decades. Implementation of this direction will require trailering OHVs between ML 2 roads.

Some forests such as the Lassen National Forest have implicitly permitted OHV travel on all their unpaved roads, subject to officer discretion for enforcement. As a result, OHV use is well established on the Forest's maintenance level 2-4 roads and on unpaved county roads through the Forest.

The Regional Forester has said all NFS passenger car roads are "highways" under the California Vehicle Code (CVC). This conflicts with the December 19, 2007 letter from the California Highway Patrol (CHP). There is no definition for a "highway" or "public highway" or "forest highway" in Forest Service Manual 7700, except in chapter 7741.1, which states:

"Forest highways are a special classification of forest roads. They are specifically designated State or local government roads that meet the criteria listed in 23 CFR 660.15.
The designation of forest highways is not intended to form a 'system' of roads. Instead, the purpose of the designation is to identify State and local government roads that qualify for construction and reconstruction funding under the forest highway program. To qualify for designation as a forest highway, a forest road must: 1) be a State or local government road that is open to the general public. A forest development road may have the designation of a forest highway, provided that the Forest Service assures the Federal Highway Administration that a State or local government agency will assume jurisdiction and maintenance responsibility upon completion of improvements." (Underlining added for emphasis.)

"Road" is the only term used throughout the FS directive system. By its own manual direction, the Forest Service manages roads, not highways. Any link to the CVC term "highway" is incorrect. Only State and local agencies manage highways.

Unpaved NFS roads (regardless of maintenance level) are not considered "highways" under the California Vehicle Code 38001, which states: "For the purposes of this division, the term 'highway' does not include fire trails, logging roads, service roads regardless of surface composition, or other roughly graded trails and roads upon which vehicular travel by the public is permitted." CVC 38026 only applies to paved highways.

The Deputy Commissioner of the California Highway Patrol sent a clarifying letter to the R5 Regional Forester on December 19, 2007, which said in part:

"We are not familiar with all the ML 3 Forest Service roadways, but if they are gravel or other dirt or unpaved roads that have been operating as mixed use roadways for years, it is our belief these roads would fall under the "roughly graded trails and roads upon which vehicular travel by the public is permitted" portion of Section 38001 VC and would, therefore, be eligible for your mixed-use definition." (Underline added for emphasis.)

FS road maintenance levels are irrelevant to the CHP and the public. The most distinguishing characteristic of a road is its surface composition. Is it paved or not? Unpaved roads are exempt from the definition of a "highway" under the California Vehicle Code.

Conclusion: The Region's policy regarding motorized mixed use on unpaved ML 3-5 roads does not conform to the California Vehicle Code. It was adopted without public involvement or interagency collaboration. Forest Supervisors in California continue to issue Notices of Intent (Klamath, Modoc, Shasta-Trinity National Forests) and Environmental Impact Statements (Eldorado, Inyo, Modoc, Plumas, and Tahoe National Forests) that say motorized mixed use is prohibited on ML 3, 4, and 5 roads under State traffic law.

Unless the Region's policy is amended, motorized mixed use on ML 3, 4, and 5 roads will be limited to three miles or less under CVC 38026 and OHV riders must be licensed and have insurance. ROC [Recreation Outdoors Coalition] drafted revised regional policy for motorized mixed use and forwarded it to FS staff in the Washington and regional offices for their consideration. We recommend it be adopted.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads. Plumas NF policy is consistent with Regional direction.

Analysis of the existing road system and decisions on new roads, road decommissioning, road reclassification and mixed use on ML 3-5 roads was not required by this FEIS. Some mixed use on ML 3 roads was considered by discretion, but not all ML 3-5 roads were analyzed for mixed use or other action by this effort. Future consideration of changes to system roads is not limited by this decision.

This decision retains approximately 3800 miles of roads and trails for OHV use.

Comment 2

Action: Public Involvement

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

The Forest Service travel management planning process in California has not promoted collaborative engagement with local jurisdictions or the public. Forest Service policies will significantly reduce motor vehicle access in the national forests.

Opportunities for the public to participate in FS travel management planning have been limited.

Background: During the inventory phase of travel management planning, the public was asked to provide information on the non-system routes they used. Maps of all of these routes were then prepared and the public was asked, again, which were the most important ones to designate. On some national forests (Lassen NF, Plumas NF, Shasta-Trinity NF, Tahoe NF), over a thousand miles of unauthorized roads or OHV trails were inventoried on each forest. However, when their Notices of Intent (NOI) were issued, the Lassen NF proposed to add only 37 miles of routes to the NFS system (3.2 percent of their inventory) and the Shasta-Trinity NF proposed to add 43 miles (3.5 percent of their inventory). The Klamath NF proposed to add 68 miles or 17 percent of their inventory. In their Draft Environmental Impact Statement (DEIS), the Tahoe National Forest proposed to add only 70.3 miles or 5 percent of their inventory under their Preferred Alternative. The Plumas NF proposed to add 280 miles or 25 percent of their inventory under their DEIS Proposed Action. Many unauthorized routes are not proposed because they cross from national forest land onto private land. Many of these routes have a long history of public use and road agreements or landowner "permission to pass" may exist. These opportunities should be explored by the Forest Service before they are eliminated from consideration.

Conclusion: FS proposals that close 75 to 97 percent of the inventoried, unauthorized routes on a forest do not reflect a reasonable balance between public access and environmental protection. ROC [Recreation Outdoors Coalition] has submitted alternatives to the Humboldt-Toiyabe, Lassen, and Shasta-Trinity NFs for their consideration in their Draft Environmental Impact Statements. Of the 1,145 miles of unauthorized routes on the Lassen NF, ROC recommended 202 miles be designated, mostly as low maintenance motorized trails. Counties and local OHV users should be at the planning table with the FS to develop transportation alternatives that better reflect public desires.

Response

Public involvement spanned over four years and involved over 20 public meetings and workshops. Public involvement occurred during four key periods, first during the public collaboration process that began in 2004, second during the 60-day public scoping period for the Notice of Intent (NOI), third during meetings with public groups to explore issues they raised during scoping, and fourth following the release of the DEIS. A complete discussion of public involvement activities is in the FEIS in Chapter 1.

Comment 3

Action: Public Meetings

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

The Forest Service travel management planning process in California has not promoted collaborative engagement with local jurisdictions or the public. Forest Service policies will significantly reduce motor vehicle access in the national forests.

The Forest Service has not engaged the counties in travel management planning. This lack of coordination will result in conflicting road management policies and foregone opportunities to have interconnected road systems that make sense to the public.

Background: There are miles of maintained, unpaved county roads within the national forests in California. OHV use is a long-standing accepted practice on many unpaved county roads.

In the past year, ROC [Recreation Outdoors Coalition] has met with several County Boards and local user groups to share information and encourage their participation in the FS travel management planning process. Many Boards were unaware of the Region's restrictive policy regarding motorized mixed use on NFS passenger car roads. On December 10, 2008, Shasta County hosted a county round table to share their concerns about the process with other supervisors. Five county supervisors signed a letter to the Regional Forester with specific recommendations to meet their planning objectives. They called for: 1) a bias for recreation; 2) strengthened coordination with the counties; 3) renewed public input into the planning process; and 4) a desire for a greater balance between public access and environmental protection.

Conclusion: Many unpaved county roads link with NFS passenger car roads. Without integrated planning and agreement on road management strategies, there will be major inconsistencies in how each agency provides for OHV recreation. The riding public will be confused. The Forest Service should fulfill their legal obligation to coordinate with counties and develop seamless transportation plans.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads. Plumas NF policy is consistent with Regional direction.

Analysis of the existing road system and decisions on new roads, road decommissioning, road reclassification and mixed use on ML 3-5 roads was not required by this FEIS. Some mixed use on ML 3 roads was considered by discretion, but not all ML 3-5 roads were analyzed for mixed use or other action by this effort. Future consideration of changes to system roads is not limited by this decision.

Changes to system roads on the basis of what other jurisdictions benignly allow by lack of statute or may possibly legislate in the future are beyond the scope of this decision. The decision does not prohibit further collaboration with counties or other jurisdictions.

Comment 4

Action: Traffic control and safety

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

The Forest Service travel management planning process in California has not promoted collaborative engagement with local jurisdictions or the public. Forest Service policies will significantly reduce motor vehicle access in the national forests.

The Regional Forester says public health and safety is his reason for restricting motorized mixed use on existing NFS passenger car roads. Region 5's policy is not substantiated by the facts.

Background: In his September 8, 2008 letter of direction to the Forest Supervisors, R5 Regional Forester Randy Moore wrote:

"As an agency, we have recognized the need to conduct motorized mixed use analysis of our road system because we have identified a public health and safety concern when we mix highway legal vehicles such as passenger cars and log trucks, and non-highway legal vehicles such as all-terrain vehicles and off-highway motorcycles on the same roadway."

Until ROC [Recreation Outdoors Coalition] requested mixed use accident data on November 18, 2008, none existed in the Region. In January 2009, the Regional Safety Officer sent a memo to the national forests asking them to submit their accident data. ROC received the data on February 6, 2009. We found Region 5's mixed use accident information does not substantiate the agency's concern about public safety. In the past 15 years, there have been 11 mixed use accidents on 41,501 miles of FS roads in California. Three accidents involved FS employees running into an OHV; 1 involved a County Deputy Sheriff hitting an OHV. The data does not indicate the road maintenance level where these accidents occurred. ROC asserts unpaved ML 3-5 roads should be open to all vehicle classes unless an exception exists for some road segments due to public safety, past accidents, resource concerns, user conflicts or other considerations that cannot be mitigated. The Regional Forester should follow Forest Service national direction and the agency's own guidebook for analyzing mixed use on FS passenger car roads.
The reference to logging trucks (or any commercial traffic) in the Regional Forester's September 8, 2008 letter is a misnomer. The Forest Service can and should impose temporary road closures for certain vehicle classes (i.e. non-highway legal vehicles) when commercial traffic is present, such as log haul during timber sales. This is an appropriate mitigation measure for public safety.

The data in Table 1 is from a traffic survey and an engineering analysis ROC did on a sample of the Lassen NF's unpaved ML 3 and 4 roads during the summer of 2005. Vehicle classes are displayed. Only 10% of the use on the Forest's "passenger car" roads was passenger cars.

[See Table 1 on Page 7] Vehicle Classes on ML 3-5 Roads, Lassen National Forest (ROC, 2005)

The average speed ranged from 10-27 mph, on 72 miles of ML 3 and 4 roads observed during the summer of 2005, as determined by a prudent driver with a recording GPS unit. Average daily traffic, using a Federal Highway Administration recording formula, ranged from 5-16 vehicles per day. There is no reason to prohibit motorized mixed use on most unpaved roads in the Lassen or other national forests.

ROC believes user education, "shared use" road signing, adequate road maintenance, good travel maps, and temporary closures of roads with commercial traffic will greatly enhance public safety on NFS passenger car roads (even though there have been few mixed use crashes without these measures). If concerns about risk develop later, they can be addressed for that particular road segment. Forest Supervisors should have the flexibility to manage public use on their road systems based on local demand, road conditions, and public safety.

Conclusion: Allow motorized mixed use on all unpaved NFS roads per the California Vehicle Code unless there is documented crash history or other safety concerns that cannot be mitigated. Involve the public in engineering analyses for mixed use when safety issues are raised. Seek collaborative solutions to mitigate the risk prior to prohibiting mixed use on a road.

Response

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on language and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Maintenance Level 3, 4, and 5 Roads. Plumas NF policy is consistent with Regional direction.

Analysis of the existing road system and decisions on new roads, road decommissioning, road reclassification and mixed use on ML 3-5 roads was not required by this FEIS. Some mixed use on ML 3 roads was considered by discretion, but not all ML 3-5 roads were analyzed for mixed use or other action by this effort. Future consideration of changes to system roads is not limited by this decision.

The argument that all roads are safe until crashes and injuries occur puts public safety at more risk than the Regional Forester considers prudent. This decision falls within his discretion and authority.

Comment 5

Action: Traffic control and safety

Resource(s): Recreation

Disposition: Resolved: Not within agency's jurisdiction (SEE RESPONSE)

The Forest Service travel management planning process in California has not promoted collaborative engagement with local jurisdictions or the public. Forest Service policies will significantly reduce motor vehicle access in the national forests. The following sections explain this further.

The Forest Service is concerned about their liability if minors are allowed to operate their OHVs on NFS passenger car roads (ML 3, 4 and 5).

Background: Motorized mixed use on NFS roads also authorizes the operation of non-highway legal vehicles by minors. The State Vehicle Code has specific requirements for safety and liability when motor vehicles are operated by minors. In addition, most State and national OHV organizations actively promote and host safety programs for youth. Manufacturers also provide safety programs and riding tips for youth. Local OHV clubs sponsor their own safety programs for new riders. In short, safety is on everyone's radar screen.

Conclusion: The State and ROC [Recreation Outdoors Coalition] share equal concern with the Forest Service over the safety and liability of minors driving non-highway legal vehicles on unpaved NFS or other public roads. However, we believe State requirements for minors are sufficient. The Forest Service does not prohibit hiking, mountain biking, skiing, snowboarding, rock climbing, hang-gliding, hunting, firearm use, driving with street legal vehicles or other recreational activities on the national forests. There are risks associated with all of these sports and, yes, some fatalities. The FS does not manage these risks by eliminating the activity or prohibiting youth under 18 or 16 years from participating.

ROC encourages the Forest Service to work with the California Highway Patrol and State Off-highway Motor Vehicle Recreation (OHMVR) Division to determine if State safety requirements for minors need to be strengthened. The FS's pattern of issuing regional policy without collaboration eliminates the possibility of shared solutions.

Response

The State establishes regulations that apply a different standard for motorized vehicle operation than for other recreational activities. State laws regarding minor operation of OHVs is beyond FS jurisdiction.

Comment 6

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

The Forest Service travel management planning process in California has not promoted collaborative engagement with local jurisdictions or the public. Forest Service policies will significantly reduce motor vehicle access in the national forests. The following sections explain this further.

The Forest Service entered into a Memorandum of Intent with the State Off-highway Motor Vehicle Recreation Division to create a system of designated roads and trails for OHV use.

Background: On August 11, 2003, the Forest Service signed a Memorandum of Intent (MOI) with the State OHMVR Division and the State OHMVR Commission to inventory and designate routes for motor vehicle travel on the national forests in California. All routes were to be designated and motor vehicle use maps published by September 2008. This partnership also provided $12 million (to date) in State OHV grants for the Forest Service to inventory non-system routes and fund the planning process. A total of 10,257 miles of non-system routes were inventoried. However, few of these miles are proposed for designation. ROC [Recration Outdoors Coalition] doubts this was the State's intent when they entered into the MOI.

Conclusion: The State OHMVR Division and OHMVR Commission funded an expensive 5-step planning process that eliminates thousands of miles of unauthorized roads and trails on the national forests in California. If you combine this with the Region's motorized mixed use restrictions on 8,903 miles of passenger car roads (ML 3-5), riding opportunities for non-highway legal vehicles will be significantly reduced at a time when the demand has never been higher. This irony has resulted in a loss of public trust in travel management planning. Obligations for public involvement under the MOI should be fulfilled to design "smart" travel management alternatives.

Response

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links.

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes the process begun with the State OHMVR Division. The data collected through that process helped to identify unauthorized routes for consideration in alternatives. Many of those routes were withdrawn from further consideration due to lack of evidence of use, incursion unto private land or non-motorized land allocations, known resource damage or the fact that they were short lengths isolated from connected networks.

Comment 7

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1] Forest Service Maintenance Levels

Letter 253

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Public Involvement

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

In the Federal Register, dated November 9, 2005, Part IV, Department of Agriculture, Forest Service, 36 CFR Parts 212, 252, 261, and 295 Travel Management; Designated Routes and Areas for Motor Vehicle Use; Final Rule, one thing stands out. The overall theme repeated in the response to comment is, "The Department believes these decisions are best made at the local level, with public participation."

Comment 2

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The other theme is, "The Department supports the general principle of equal public access to Federal lands." One size fits all should never be considered as the norm. Each Forest and each Ranger District has its own unique area and circumstances.

Comment 3

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Quoting the November 9, 2005 Federal Register, "The Department agrees that it would be helpful to add a definition for "off-highway vehicle" to the final rule. The Department is not adding a definition for "all-terrain vehicle" and "motorcycle" because they are only two of many different types of OHVs and because the final rule does not distinguish among types of OHVs. The Department also is not adding a definition for "considerable adverse effects" because a determination of considerable adverse effects caused by motor vehicle use for purpose of effecting a temporary, emergency closure under 212.52 (b) (2) of the final rule depends on specific factual

circumstances in certain contexts. Specific circumstances may include public safety or soil, vegetation, wildlife, wildlife habitat, or cultural resources associated with a particular road, trail, or area." The key points are specific circumstances, safety, and particulars.

Comment 4

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

In the November 9, 2005 Federal Register it is stated, "It is not necessary to expand the definition of area to encompass specific uses, such as grazing. The final rule provides for designation of NFS roads, NFS trails, and areas on NFS lands for motor vehicle use, and prohibits motor vehicle use other than in accordance with these designations. Motor vehicle use that is specifically authorized pursuant to a written authorization issued under Federal Law 261.13(h) of the final rule is exempted from this prohibition. In addition, in making these designations, the responsible official must recognize valid existing rights 212.55(d) of the final rule. To address specific local needs for limited cross-country motor vehicle use for big game retrieval or dispersed camping, the Department is adding a paragraph to 212.51 of the final rule. This new paragraph provides that in designating routes the responsible official may include in the designation the limited use of motor vehicles within a specific time period, solely for the purpose of big game retrieval or dispersed camping. Some areas of high route density may be appropriate for designation as areas. Others will not. The Department believes that designation decisions should be made at the local level, based on site-specific evaluation of local conditions and public involvement." The key elements here are, the responsible official must recognize existing, rights, of which safety should always be a key element. Also the responsible official needs to address the local needs for limited cross-country motor vehicle use of big game retrieval or dispersed camping. The Department believes that designation decisions should be made at the local level, based on site-specific evaluations.

Response

See Recreation Section 3.2.5.1 Indicator Measure 4 for specific information on reduced dispersed camping opportunities. Additional trails can be added in the future to access dispersed camp sites that were not included in this analysis.

Comment 5

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

On page 8-9, Non-Significant Issues – Reasons why not addressed in the proposed action: This issue is outside of the scope of the purpose and need for the project. This proposal is focused only on motor vehicle use in accordance with 36 CFR 212, Subpart B of the Travel Management Rule. It is easy for one to understand the specifics under Item 2, regarding mountain bikes, hiking and horseback riding. It is not easy for one to understand/accept that the motorized vehicle and what is towed behind it, i.e., horse trailer, recreation trailer, tent trailer was not addressed or even considered in the DEIS.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Comment 6

Action: Non-Motorized/Dispersed (hiking, hunting, horseback, camping, fishing, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

On page 27, --2.4.2 Designate Areas for Dispersed Camping, "Designating existing dispersed campsites was considered during proposal development. This was eliminated from detailed study because it did not closely relate to travel management. Dispersed campsites are flat areas where people camp and park vehicles incidental to camping, generally adjacent to roads. They are not travel routes. In addition, the Interdisciplinary Team found that ongoing management of individual dispersed campsites provides resource protection, and there was no immediate need to limit or regulate dispersed camping." The Forest Service is not being completely above board with the

public as the National OHV implementation Teams Motor Vehicle Route and Area Designation Guide pertaining to road, trail and small open area designations was not shown to the public in the DEIS process.

Response

Dispersed camping will continue to be allowed on the Plumas National Forest in established camp sites when parked no more than a car length off a road or motorized trail.

Comment 7

Action: NEPA Process General

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

On page 32-33 – 3.1.4 Assumptions and Limitations, item 8. For travel management, the federal action triggering NEPA, is any change to current restrictions or prohibitions regarding motorized travel by the public (for example prohibiting cross-country travel, changing management ---changing vehicles class or season, or use and any additions or deletions of facilities (roads, trails or areas) to the NFTS. Based upon this statement, if FSM 7716.1 (1) is implemented the NEPA process has been violated. The NEPA process is the balancing of social benefits to humans, against the adverse negative effects on the environment. Item 10. Dispersed recreation activities (i.e. activities which occur after the motor vehicle stops such as: camping, hunting, fishing, hiking, etc.) are not part of the scope of the proposed action. The action and the analysis focus on motor vehicle use. The general public perceives this was purposely left out to avoid a more comprehensive elevation of routes and sites. This violates the NEPA process.

Response

The Plumas National Forest will not restrict use of dispersed campsite off system roads and trails. For specific information on reduced dispersed camping opportunities, see Recreation Section 3.2.5.1 Indicator Measure 4. Additional trails can be added in the future to access dispersed camp sites that are not adjacent to system roads and trails.

Comment 8

Action: Traffic control and safety

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

In the, "National OHV implementation Team, Motor Vehicle Route and Area Designation Guide," under Road, Trail and Small Open Area Designations it is stated: "A designation for a road or trail includes all terminal facilities, trailheads, parking lots, and turnouts, associated with the designated road or trail. The designation also includes parking a vehicle so that all parts of the vehicle are within one vehicle length from the edge of the road surface when it is safe to do so and without causing damage to NFS resources or facilities (FSM 7716. (1) (proposed)."

Nowhere in the Federal Register dated November 9, 2005 is direction given, or is parking identified as an issue, nor is a vehicle length. Supposedly these kinds of decisions are to be made at the local level. The FSM proposed policy method is meant to deal with every conceivable situation, "one size fits all," so to speak. Common sense dictates that whenever one is driving any wheeled motor vehicle /OHV, to participate in some sort of recreation, hunting, fishing, hiking, horseback riding, day use, picnics etc., one will eventually need to, or want to stop, and park or set up camp, yet the public has been told this is outside the scope of a project. The Forest Plan/Wheeled Motor Vehicle Plan cannot provide safe recreational access when one must park within one vehicle length form the edge of a road, nor can the public understand/accept the concept that traveling beyond one vehicle length that one has traveled cross-country.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Comment 9

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Others have concern also. "During the informal consultation between the USFS and the California Department of Fish and Game, (CDF&G), associated with the R5 Route Designation process the CDF&G understood the agencies intent and were in support of the strategy for planning and implementing a system of designated routes in California, and did not support the limited use of cross-country travel."

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

On page 40-41, 3.2.4.1 Recreation Visitor Use – There is no data appearing for dispersed camping, and only 11.4% of forest visits were reported for developed camping. It is hard to imagine that not one person reported camping in a dispersed area, thus there is cause to question the analysis as being incomplete or flawed.

Response

Primitive camping and dispersed camping could be considered the same.

Comment 11

Action: Alternatives General (add, change, delete)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Speaking for myself only, upon reviewing all five of the alternative, it is very difficult to make a decision. Far too much, is being taken away from the public. Personal preference would be Alternative 1, the baseline. Personal preference is to let the Forest Supervisor operate upon his/her Forest Orders. Under this alternative the Forest Supervisor would be adhering to the Federal Register quotation/direction dated November 9, 2005 "The Department believes these decisions are best made at the local level, with public participation." Preference would be that identified resource damaged site-specific areas would be closed until the area had been restored. Only site-specific areas that had been abused, due to cross-country travel, and/or resource damage would be closed, not the entire forest. The Forest Service interpretation of traveling cross-country is by far too restrictive.

Having to choose an alternative, based upon the reading material and the maps it appears that Alternative 2 or 5, (leaning more towards 5), would offer the next best alternatives. The Forest Service created some of the un-authorized roads or loop trails for assorted functional purposes, namely timber sales. Over time these routes became favorite roads or loops to access dispersed camping sites or short OHV rides.

Comment 12

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Both alternatives [2 and 5] are in need of mitigation measures. I believe, and request that inventoried routes or trails should not be closed until mitigated.

Response

Trails with "High" mitigation needs will be designated as system trails but not placed on the Motor Vehicle Use Map until the mitigations have been completed.

Comment 13

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

On the Alternative 2 map, 13M42 is not shown. 13M42 does appear on the Alternative 5 map. Was this an oversight, or is it excluded in Alternative 2? One of the public's favorite dispersed camping area is approximately 1 ½ mile from Murdock Crossing,)R 13 E and T 26 N s/w section of 20) and this is not shown on Alternative 2.

Response

13M42 was not in the Proposed Action (Alternative 2) and was added after public scoping to Alternative 5.

Comment 14

Action: Adequacy of Studies (Best Available Science)

Resource(s): Vegetation (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

On page 282, - 3.8.8 Environmental Consequences – Effects of Alternatives on Rare Plant Species and Botanical Resources – Recreational motor vehicles or OHV's are not the only contributing factors of adverse affects causing environmental consequences. Even Forest Service vehicle use is a contributing factor when one gets right down to it. Other factors that cannot be factored in is drought, fires, and other natural disasters. Some of these have to been contributors. Evaluating the environment above the balancing of the social benefits to humans is against the NEPA process.

Response

Thank you for your comment.

Comment 15

Action: See Attachment

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1:] Resolution from BackCountry Horsemen of California opposing approval and/or implementation of the Parking Rule contained in Forest Service Directive FSM 7716.1.
Dated: October 11, 2008

Comment 16

Action: See Attachment

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2:] Resolution from the California Division Incorporated of the National Pony Express Association Incorporated opposing the implementation of the Parking Rule/Policy/Regulation, One Vehicle Length From the Edge of the Road Surface.

Letter 254

Attributes

Attribute	Value

Early Attention	None
Response Type	Petition
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

We the undersigned do hereby present this 'Petition' to the United States Congress and to the United States Department of Agriculture, USDA Forest Service, Washington D.C., and specifically Region-5, as well as other Forest Service Offices.

We the undersigned are the users, of public Forest Service land that has been set-aside for multi-use. Public lands deserve resource oversight but not to the exclusion of other popular uses such as, camping in dispersed areas, hiking, bicycling, hunting, equestrian and all terrain use. The publics land is becoming increasingly and unreasonably restricted. This condition is due to a decision to restrict wheeled motor vehicle travel, under the guise of needing to restrict and control off highway vehicles, (OHV), to a system of designated routes across the Forest. The decision to implement the travel management rule requires that all national forests and grasslands designate roads, trails and areas where motor vehicle use is allowed and prohibit cross-country travel by cars, trucks, ATV's, motorcycles, RV's basically any wheeled vehicles. The Forest Service meaning of cross-country is – one vehicle length from the edge of a road.

We the undersigned are totally opposed, to the Forest Service, draft FS Manuel 7716.1 (1), "A designation for a road or trail includes all terminal facilities, trailheads, parking lots, and turnouts associated with the designated road or trail. The designation also includes parking a vehicle so that all parts of the vehicle are within one vehicle length from the edge of the road surface when it is safe to do so and without causing damage to NFS resources or facilities (FSM 7716.1 (1) Proposed). We furthermore believe, the Forest Service is grossly misinterpreting the term cross-county travel.

We the undersigned believe this decision/implementation, is unsafe and unreasonable. It presents a grave liability risk to users of vehicles that tow any recreational sort of trailer. It also presents unsafe conditions for equestrians upon loading and offloading of their horses for personal or group rides, as well as bicyclist. Implementation the one vehicle length from the edge of the road rule, invites theft and damage to personal property. This also invites the Forest Service to become a part of the liability issue due to the unsafe circumstances.

We therefore, seek intervention in the implementation of such a restrictive and unsafe administrative rule or regulation, and the gross misinterpretation of the term cross-country.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail. Dispersed camp sites, landings, turnouts and other use areas are considered part of the road or trail facility and would allow for a safer location for parking.

Letter 255

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Form	2

Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 1

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Using a map review the Plumas Forest staff have omitted over 700 miles of inventoried routes from DEIS alternatives two through five and 1100 miles from alternative three. I believe a plan that omits routes without looking at them on the ground is flawed, as the recreation opportunity may not be apparent from only map GIS data. Please add these routes back in.

Response

The inventoried unauthorized routes were reviewed by specialist and 200 miles were presented to the public as a first draft for a proposed action. The public was asked to submit additional routes to be considered and an additional 165 miles were added to the proposed action. The proposed action was published on January 3, 2008. Based on public scoping, an additional 35 miles were surveyed for a total of 410 miles.

Many short dead end spurs, roads leading to private land and roads with resource concerns were not surveyed. Some routes did not have easements for access. There was a limit to how much survey work could be completed with the time and money available. Some routes did not have easements for access.

Comment 2

Action: Mitigation/BMPs

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas Forest DEIS discussed that certain routes will be closed until mitigated. I request that these routes be left open until mitigation/repair occurs. I also request that the Plumas Forest provide a timeline and plan for proposed mitigation work.

Response

The trials with High mitigation requirements need to be mitigated before continued use occurs. Some of these may need out sloping, drainage structures, drainage crossings, weed pulling, and cultural feature evaluations. Most of the mitigations will need to be completed by volunteer labor and with grant moneys. There needs to be an incentive to complete the mitigation so the impacts do not continue through existing use.

Comment 3

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas Forest DEIS alternatives do not offer an OHV (ORV) alternative. An alternative that closes the forest only to cross country travel, however, designates all inventoried routes would be the ideal OHV alternative. It would also meet the requirements of the travel management rule while protecting the environment from resource damage caused by new cross country travel. I request this true OHV alternative be added.

Response

Alternatives 2, 4 and 5 all add additional OHV trails. The travel management rule requires that the trail system be sustainable over time which is occurs in alternatives 4 and 5. Alternative 2 contains trails that are causing unacceptable resource damage and are not appropriate in their current location.

Comment 4

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Plumas National Forest has previously published a "Summer OHV Use Map". I request that all the OHV (ORV) routes indicated upon the Summer OHV Map be added back into each alternative.

Response

The "Summer OHV Use Map" does not meet direction from the Travel Management Rule and the Mixed Use requirements. The "Summer OHV Use Map" was made as a guide for forest visitors not as an law enforcement document as our Motor Vehicle Use Map will be. We are hoping to put together distinct maps that with display loop for different riding abilities and interests.

Comment 5

Action: Seasonal Closures

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The Plumas Forest DEIS recommends certain routes be closed seasonally. Since rain can occur at any time and may not occur during periods when it is expected, I request that a rain gauge measured closure together with a drying time is superior system to closure based solely on arbitrary dates.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist. Precipitation data does not adequately describe saturation and soil moisture conditions so a closure based on rain gauge data alone would not accurately predict when travel on the trails would not produce soil and water impacts.

Comment 6

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Private landowners are the appropriate party to decide if access to and from their land is permissible. I request that the Plumas designate all routes up to private boundaries.

Response

The Plumas National Forest would be irrespirable to lead OHV users to private property. If a trail is desirable across private property, an easement must be acquired to allow the trail to be added to the system.

Comment 7

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Water Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I request the Plumas FEIS address the impact that each route's width (single-track, 50" or less, etc) affect upon water quality.

Response

The "Field survey methodology" section of 3.5.3.1 has been clarified. The methodology recognizes that the amount of sediment that is dislodged and mobilized from a narrow trail surface may be less than the sediment dislodged from a wider road surface. However, whether or not significant erosion occurs from a road or trail depends largely upon how well the route's drainage features disperse runoff and prevent concentration of flow along the surface, down fill slopes, along cut slopes, etc. A narrow surface and template is usually equally capable of disrupting natural drainage patterns and concentrating runoff as a wider template. Therefore, the length of proposed roads and trails open to motorized traffic (expressed as a density in relation to the watershed area) is used as the indicator for cumulative watershed effects of the project alternatives.

Comment 8

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

California Highway Patrol has stated in writing that forest roads are exempt from California Vehicle Code Section 38001. However the Plumas Forest staffs have chosen to prohibit motorized trail vehicles from forest trails and roads. I request the Plumas continue to allow non street legal vehicles on forest roads and trails.

Response

The Biological Opinion will be available when the FEIS is published.

Comment 9

Action: Scope/Scale of analysis

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I request that dispersed camping and wood cutting be addressed as outside the scope of the Public Motorized Travel Management EIS.

Response

Fire wood cutting is managed by the fire wood permit. Additional cutting areas can be opened by the District Ranger.

Letter 256

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Form	3

Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 2 (Proposed Action Alternative)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I support the proposed alternative 2 action of the OHV Route designations DEIS. As a resident of Oroville and a frequent user of the Plumas National Forest, this plan best supports my activities and protects the forest for future generations.

Letter 257

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please read the section of the CVC that is attached that states that Forest Service roads are not Highways and should be open to use by ATV's and Single-Track vehicles.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on langauge and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads.

Comment 2

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: California Vehicle Code V.C. Section 592, Street or Highway-Highway Exclusion.

Letter 258

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I favor Alternative 3 because it will close all unauthorized ORV routes. Those should be rehabilitated to a natural state. Unauthorized routes have proliferated into spider web that is causing serious environmental impacts against land, water and wildlife habitat. ORVs are spoiling the vacations of many other visitors who come to enjoy a quiet, wild place. I oppose your alternative that would open 364 miles of unauthorized routes to ORV traffic.

Comment 2

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

All Inventoried Roadless Areas should be closed to ORVs, including the Feather Falls area proposed for wilderness by Senator Barbara Boxer, the Squaw Peak citizens' roadless area, and the Middle Fork Feather River roadless area. The roadless areas are the most natural and wild lands you have outside of wilderness areas. They should be kept safe from ORV damage to protect their wild character.

Comment 3

Action: Classification

Resource(s): Water Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

Closures should also protect all mountain meadows and proposed Wild and Scenic Rivers.

Comment 4

Action: Seasonal Closures

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I favor seasonal restrictions to bar ORVs during the period when the land is most vulnerable to erosion – November 1 to April 30.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects.

Comment 5

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Dispersed camping should be restricted to on vehicle-length from the route to prevent more unauthorized spur roads.

Response

For parking, the Travel Management Rule allows a limit for parking of one vehicle length from the edge of the road or trail.

Comment 6

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Locked gates should be used to keep ORVs out of closed areas and trails.

Letter 259

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Please abandon the notion of opening 364 miles of unauthorized routes to ORVs and work toward a more constructive plan to reduce the impacts of ORVs in the forest.

Comment 2

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Alternative 3 is the best alternative for the health of the forest.

Comment 3

Action: Seasonal Closures

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The final plan should include a winter season closure of all ORV routes to prevent erosion of wet soils.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects.

Comment 4

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

ORVs should be excluded from all inventoried roadless areas and from the proposed wilderness areas nominated by citizens' groups, including the Middle Fork of the Feather River, Squaw Peak, and Feather Falls, which is already in Senator Barbara Boxer's wilderness bill.

Comment 5

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The regulations of the Forest Service require you to adopt the "minimum road system needed." It must be based on a "science-based analysis" that identifies roads that are no longer needed. Those requirements have not been satisfied in your current proposal. Alternative 3 comes closest to meeting them.

Response

The Travel Management Rule is comprised of three parts: Subpart A Administration of the Forest Transportation System; Subpart B Designation of roads trails and areas for motor vehicle use; and Subpart C Use by over-snow vehicles. The scope of this action is focused on the prohibition of cross country motor vehicle travel to allow implementation of subpart B and the production of a MVUM in accordance with the Chiefs timeline. The identification of the minimum road system needed for administration, utilization and protection of NFS lands is contained in subpart A. There is no legal requirement in the regulations that the agency implement subpart A as a pre-condition to, or part of, the current proposed action.

Comment 6

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Please remember there is a national interest in the roadless areas of the Plumas National Forest. The top priority should be to protect them from impacts of ORVs.

Letter 260

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please reject the idea of opening 364 miles of unauthorized ORV routes and instead close and rehabilitate them to nature as in Alternative 3. They serve no essential public purpose and would only degrade the public values of the forest. ORV riders already have 4100 miles of other roads that lace the Plumas. Remember, less than 1 percent of visitors to the Plumas came primarily for off-roading.

Comment 2

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I favor Alternative 3, but the final decision should do more to reduce the excessive road system. Too many roads have dissected the fish and wildlife habitat, degrading fish spawning areas and leaving few areas that are truly remote. Unnecessary primitive roads have dissected the wilderness areas proposed by California conservationists.

Comment 3

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

ORVs should be barred from all Forest Service-inventoried roadless areas and from citizen-inventoried roadless areas, including Feather Falls, Squaw Peak, and Middle Fork of the Feather River.

Comment 4

Action: Seasonal Closures

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

I favor the winter seasonal closure you proposed to keep ORVs from stirring up saturated soils. It should apply to all native surface routes throughout the forest.

Letter 261

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas is a national forest, and it deserves careful protection against damage by ORVs.

It is surely wrong to be adding 364 miles of illegal, unauthorized ORV routes to the official route map, as proposed in your draft. Please drop that idea and instead work toward a restoration of the forest from the ecological damage and scars left by ORVs.

Comment 2

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Your proposal does not identify obsolete roads and decommission them, and there has been no science-based analysis of the existing route system. Those analyses are required by Forest Service regulations, and they should be done before this project goes any further.

Response

These routes are part of a designated road and trail system and are within an area that meets all requirements of the National Travel Rule. Revisiting the actual route designations is outside the scope of this decision. The rehabilitation of system roads and trails and user-created routes will need to have a separate environmental analysis with public involvement before any ground disturbing activities are implemented."

Comment 3

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I favor Alternative 3, but it should be strengthened by closing all ORV routes encroaching on the citizens' proposed wilderness areas, including Feather Falls, Squaw Peak, and Middle Fork Feather River.

Comment 4

Action: Seasonal Closures

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

A winter season closure should be applied to all native surface routes, to prevent damage in saturated soils.

Letter 262

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Removal/obliteration

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas is already laced with more than 4,000 miles of roads. Your draft plan starts off on the wrong foot by proposing that 364 miles of unauthorized routes created by ORVs be sanctioned as official forest roads and trails. Instead, we urge you to close all unauthorized routes and rehabilitate them to a natural condition. ORV riders are a small minority of forest visitors, and they already have 4,100 miles of routes open in the Plumas.

Comment 2

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

We support Alternative 3 as described in the draft, but it should be strengthened by closing all routes in the inventoried roadless areas and citizen-inventoried roadless areas. We would like to see ORV banned from proposed wilderness areas such as Middle Fork of the Feather River, Feather Falls, and Squaw Peak.

Comment 3

Action: Seasonal Closures

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

We support a winter seasonal closure of al ORV routes to prevent erosion of wet soils, like the winter closure already adopted in the Eldorado and other national forests.

Letter 263

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

The proposal to approve 364 miles of unauthorized user-created ORV routes is far in excess of any public need. It would do great damage to the resources of the Plumas National Forest. We have seen the damage done by ORVs close to home, and many residents of the Rogue Valley are becoming alarmed at the impacts on our public forests.

Comment 2

Action: Alternative 3 (Adds no new trails/roads)

Resource(s): Wildlife and Wildlife Habitat (No TESS)

Disposition: Resolved: Comment acknowledged; does not provide new information

Please adopt Alternative 3. It is the best alternative because it protects public values by closing all unauthorized user-created ORV routes. It gives the best protection to wildlife and fish habitat against the impacts of ORVs.

Comment 3

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Roadless areas – The plan should bar ORVs from all six Inventoried Roadless areas and the roadless areas inventoried by citizens' groups. A high priority is to protect the proposed Feather Falls Wilderness proposed in Senator Boxer's bill, the Middle Fork Feather River IRA, and the Squaw Peak citizens' roadless area.

Comment 4

Action: Seasonal Closures

Resource(s): Soil Resources

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Establish restrictions – Season closures should be adopted to prevent ORVs from making severe impacts when the soil is saturate, such as from spring runoff. All native-surface routes should be closed to ORVs from December 1 to May 1. Dispersed camping should be limited to one vehicle length from the road's edge, so people will not drive in farther and create a plethora of new roads.

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects.

Letter 264

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	Mailing list only or nothing to code (do not attach a flag)

Letter 265

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +

Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Form	1+
Comment Extension	No extension requested
Request Information	Mailing list only or nothing to code (do not attach a flag)

Letter 266

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

The PNF has seen an increase in sheer numbers of ATVs and other off-highway vehicles (OHV). Nationwide, OHV numbers have jumped from 5 million in 1972 to more than 51 million now (U.S.F.S. Statistics). OHV use can degrade roads, soil and water quality faster than any other form of forest recreation. SPI has become increasingly troubled with the increase of (OHV) use in the Feather Falls and French Creek management areas and with the ability of OHV users to access ever-increasing portions of both SPI and public wildland areas. We are concerned about the overall effects of OHVs, particularly the 4x4 vehicles but also ATVs and motorcycles.

Uncontrolled vehicle trespass on SPI lands results not only in direct damage to roads and adjacent watercourses but also negatively affects many forest resources. A few of these resources include soils, water quality, plantations, archaeological sites and wildlife habitat. OHV use has caused an increase in illegal activity including dumping, theft, vandalism and a significant increased risk of ignition of wildfires.

Comment 2

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

SPI [Sierra Pacific Industries] endorses the need to designate and manage OHV travel routes in order to protect the road assets shared by SPI and the PNF and to reduce the negative effects of OHV use on both public and private forest resources.

On SPI's Stirling District our road access policy restricts road use with a combination of active road patrol, locked gates and barrier controls, posted road signs which state access are allowed by written permission only. No off-road trail is allowed. We permit OHV use on un-gated roads during dry road surface conditions. Motor vehicle travel and off-road travel over gated, posted or blocked roads (including open gates) is considered trespassing.

Comment 3

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to present just a few examples of current direct effects of OHV use on SPI property adjacent to PNF roads in the Feather Falls management area:

Fall River Crossing, Forest Road 94, SPI seasonal roads T21N R7E Section 27:

There is marked degradation of the meadows and wet areas caused by off-road travel and camping trespass. Vehicles are routinely seen parked in the middle of Fall River, degrading water quality and causing erosion from the banks to go directly into the Fall River. Destructive off road OHV trails radiate from this location.

Comment 4

Action: Other/Unspecified

Resource(s): Recreation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to present just a few examples of current direct effects of OHV use on SPI property adjacent to PNF roads in the Feather Falls management area:

Pinchard and Cascade Creeks, Forest Road 21N23 SPI seasonal roads T21N R7E Sections 2 and 3:

OHV use has damaged the erosion control structures on SPI roads and sid trails in these areas. There has been the creation of off-road trails through many newly planted areas resulting in hillside erosion and damage or destruction to small trees.

Comment 5

Action: Construction and maintenance

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to present just a few examples of current direct effects of OHV use on SPI property adjacent to PNF roads in the Feather Falls management area:

Throughout the Forest Road system which passes through SPI property:

Continued vandalism and destruction of gates, signs and barrier controls on SPI private seasonal roads.

SPI is concerned about the overall effects of OHVs on roads across the Forest for which we share maintenance responsibility. OHV use, when the road surface is wet, causes the failure of drainage structures by creating wheel ruts that channel water over rolling dips, water bars and other structures designed to divert water off road surfaces. This action damages the road surface and in many locations, accelerates the movement of sediment from the road surface into adjacent watercourses causing the deterioration of water quality. These effects on these cost-share roads result in a direct cost to SPI in the form of greater recurrent and deferred maintenance needed to restore the road surface and drainage structures and to mitigate the effects of increased sedimentation from road surfaces resulting from OHV use. As private landowners we have additional legal standards and reporting for road maintenance and water quality violations, required by California law. The Stirling District routinely spends in excess of $200,000 dollars per year to repair damage to our property and roads caused by OHV trespass.

Comment 6

Action: Enforcement/Funding/Staffing

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It is evident that the PNF is currently struggling to maintain the existing system of roads and trails currently found on the forest. Before adding new routes, the PNF must first adequately manage and commit funds to enforce and administrate the existing OHV use of the Forest. SPI [Sierra Pacific Industries] believes that this situation should be addressed first before any new proposed action is implemented.

Comment 7

Action: Enforcement/Funding/Staffing

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

SPI [Sierra Pacific Industries] supports the PNF plans to increase the enforcement of the restrictions on OHV use. SPI agrees that the PNF needs to put forth a greater effort to educate OHV user groups regarding the potentially negative effects of their activities. We believe that registering visitors and OHV user fees may be useful not only to limit OHV use but also to fund mitigations, enforcement and educational efforts.

Comment 8

Action: Mapping, GIS

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

SPI [Sierra Pacific Industries] has reviewed the existing PNF Off-Highway Vehicle Map and believes that it is inadequate for public use. SPI would like to see accurate mapping of the designated OHV use areas as well as clearly delineated ownership patterns. The PNF needs to provide a map that clearly designates public land and private land. This map should plainly display PNF access routes. SPI supports the PNF plan to improve signing of the Forest Road system. Clear, consistent and adequate signs should be installed stating public use on private property is prohibited and controlled by the private property owner and OHV use behind locked gates is trespassing.

Response

The final Motor Vehicle Use Map will be produced for each Range District. These are the legal maps required by the Washington Office. In addition Recreational Use Maps will be produced that provide more detail and will be easier to read.

Letter 267

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

SPI [Sierra Pacific Industries] endorses the purpose and need to manage the motor vehicle use on the Plumas National Forest (PNF). The proliferation of public motor vehicle use has skyrocketed over the past 10 to 15 years. Many improvements and new types of Off Highway Vehicles (OHV) allow users to access and traverse much more

difficult terrain whether prudent or legal to do so. It is SPI's desire that the outcome of the Motorized Travel Management Plan results in protecting USFS road and land resources, SPI and other private interest road and land resources, and the SPI/USFS shared easement roads.

Comment 2

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

The Draft EIS and preferred alternative ignores or fails to address many issues making the Motorized Travel Management Plan unworkable in its present form. The plan negatively affects adjacent private landowners and increases the danger of accident and harm to the public and individuals who live or make a living working in the forest.

In many ways SPI [Sierra Pacific Industries] will be uniquely affected by your decision. First, SPI owns and manages about 50,000 acres of private timberland within the PNF. SPI roads, timberlands, biological resources, plantations and other long-term management investments are negatively impacted by inappropriate public motor vehicle and OHV recreational use. Your decision regarding the type, extent, intensity and timing of public motorized travel will escalate these impacts. Our specific concerns will address existing and increasing impacts to vehicle and commercial travel safety, impacts to road systems, wildlife, meadows, riparian systems, water quality, plantations and other resource values.

Comment 3

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Of great concern to SPI [Sierra Pacific Industries] are many of the route designations and how public access to the routes will adversely affect our ability to control access to our private roads and land base. Many examples already exist of trespass and unauthorized use creating damage to SPI roads, plantations, meadows, riparian zones, archaeological sites, highly erosive soils and sensitive plant and wildlife areas.

Comment 4

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It appears no attempt was made to check the validity, logic or usefulness of the designated routes or how many of these routes will negatively affect PNF neighbors. Some examples of these inadequacies are:

Some mainline road systems to remain open to "Highway Legal Vehicles only" contain unconnected USFS easement spurs off of the mainline road system proposed open to OHV use. It is illogical to assume that OHV users will trailer their dirt bikes or ATVs on the mainline road system to each designated spur, and then off-load their vehicles to use on the designated spurs only. Virtually all OHV users will simply drive on the "Highway Legal Vehicles only" mainline road system to access each OHV designated spur.

Example: Squirrel Creek Road, Bradys Camp Road (Label "A", map 1).

Response

These system roads will be shown on the Motor Vehicle Use Map for licensed vehicle use.

Comment 5

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It appears no attempt was made to check the validity, logic or usefulness of the designated routes or how many of these routes will negatively affect PNF neighbors. Some examples of these inadequacies are:

Many route designations stop at the entrance of blocks of SPI [Sierra Pacific Industries] property but the road system continues into SPI property as an SPI private road. The designation leaves SPI's roads and property wide open to OHV trespass.

Example: Label "B", map 1.

Response

These system roads will be shown on the Motor Vehicle Use Map for licensed vehicle use. Private landowners need to sign and or block access at their private land boundary.

Comment 6

Action: Adequacy of Studies (Best Available Science)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It appears no attempt was made to check the validity, logic or usefulness of the designated routes or how many of these routes will negatively affect PNF neighbors. Some examples of these inadequacies are:

Many route designations pass through large blocks of SPI [Sierra Pacific Industries] property leaving all private spur roads intersecting the designated route wide open to OHV trespass.

Example: Label "C", maps 1, 3.

Response

These system roads will be shown on the Motor Vehicle Use Map for licensed vehicle use. Private landowners need to sign and or block access at their private land boundary.

Comment 7

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It appears no attempt was made to check the validity, logic or usefulness of the designated routes or how many of these routes will negatively affect PNF neighbors. Some examples of these inadequacies are:

Through the review of the preferred alternative map, many designated routes incorrectly imply that the PNF has easement for motorized travel access on SPI property. Our records show no easement on the examples I have listed on attached maps. This is a serious flaw and should be corrected prior to issuing any additional maps to the public. Prudent checking by your staff on all road systems that pass through private lands for verification of easements should become a priority. SPI [Sierra Pacific Industries] would be available to assist with any questions regarding this.

Example: Label "D", maps 1-3.

Response

Please highlight routes lacking easements. Our intent is to not show system roads on private land for which we have no easement.

Comment 8

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

It appears no attempt was made to check the validity, logic or usefulness of the designated routes or how many of these routes will negatively affect PNF neighbors. Some examples of these inadequacies are:

Through the review of the preferred alternative map, it is unclear as to the season of allowed use for "Existing National Forest System Roads". As you know, most damage to roads occurs during late fall or early spring when roads become or already are saturated. Your season of allowed use includes these times.

Response

We have not restricted system road season of use with this effort.

Comment 9

Action: Enforcement/Funding/Staffing

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

No change or expansion of OHV use should take place without adequate funding in place to manage and enforce the program.

Comment 10

Action: Mapping, GIS

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The designated route forest map is too small, lacks detail and relies too heavily on the belief that the general public will know how to decipher the map.

Response

The final Motor Vehicle Use Map will be produced for each Range District. These are the legal maps required by the Washington Office. In addition Recreational Use Maps will be produced that provide more detail and will be easier to read.

Comment 11

Action: Mapping, GIS

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

Your current public firewood cutting and Christmas tree program and associated small-scale maps create a yearly negative impact on our resources from the public knowingly trespassing on SPI [Sierra Pacific Industries] lands.

Comment 12

Action: Infrastructure (pipes, utilities, bridges, gates, signs, parking lots, etc.)

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

SPI's [Sierra Pacific Industries] believes the lack of signage on the ground at designated route ingress and egress presents a major flaw in the proposed program and an unacceptable burden to adjacent landowners. The general public lacks the knowledge to know where PNF ownership begins and ends (especially with the maps provided to them) or where PNF jurisdiction of roads and designated routes beings and ends. Dozens of designated routes end at SPI property lines but continue on as private roads into SPI lands without a gate, barrier or signage to distinguish the change in road or land ownership. Dozens of designated routes pass through SPI property but the spur roads off the designated route are private roads without gates, barriers or signage to distinguish road or land ownership. It is unacceptable and untenable to place the burden on SPI or any private landowner to fence or gate

and sign all private roads that continue beyond or intersect with proposed (or existing) designated routes in an attempt to prevent trespass and unauthorized use. Even if an adequate level of signage could be installed and maintained, the signs, if seen, would only work for law-abiding public travelers.

Comment 13

Action: Alternative 5 (Emphasizes access and motorized rec.)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

With the preferred alternative as written, the PNF will dump the burden of increased trespass, private road, property, resource and environmental damage and the costs to repair that damage on the backs of every landowner within or adjacent to PNF lands.

Comment 14

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Maps of Easements and Maintenance.

Letter 268

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	US Mail or Commercial Carrier (UPS, FedEx)
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

As a large forest landowner, we experience the same problems associated with unrestricted use of OHV's on the land, and support your efforts to manage this ever-increasing use. However, we wish to insure that all existing roads across National Forest lands, that are not resource problems, are carried into the adopted road system to allow reasonable access to adjacent private lands such as ours. There are several situations specific to our ownership in the Greenville area that we wish to offer as examples.

Issue 1: Roads originating on National Forest land and terminating on private land. If not included in the Final Travel Management Plan, could they still be permitted for private access and commercial use? Example: Road shown as U5907 in T26NR09E section 23 on Map 2 of Interim Forest Order 18-08, provides needed access to our property in section 27. It is not included on any of the Travel Management Plan alternative maps. If it has been intentionally left off, would like reason(s).

Issue 2: Roads originating on private land, with segments across National Forest lands that terminate on private land. Would use of these segments still be permitted for private and commercial access if they are not included in

the Final Travel Management Plan? Examples: See T26NR09E sections 11, 14.

Issue 3: How will road segments described in issue 2 above, that are located within designated Vehicle Restricted Areas, be impacted? Example: See T26NR09E section 14.

I have included a copy of our road system map which shows the roads described in issues 1-3. These three examples are just from one specific area and one landowner. No doubt they apply to other areas and landowners as well. Therefore a response that addresses the larger questions posed, as well as our specific situations, will be appreciated.

Response

The Plumas National Forest will continue to use Road Use Permits to allow Forest Service road and trail access to private timber land.

Comment 2

Action: See Attachment

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Map of SPI [Sierra Pacific Industries] Road System.

Letter 269

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I can't see the reasoning behind closing roads and trails that are already in existence. Obviously there was a reason the trail or road was created, for example to get to a creek, mine or lake, or just a place to hunt. So I don't see the reason to close them. Except just to stop motorized travel.

Letter 270

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Update, Change, or Add Data to Existing Studies

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

There needs to be a time line and cost assessment for completion prior to initiating blanket trail closers. An open-ended plan will result in delay after delay.

I ask that you not approve such a broad brushed proposal. More details are needed.

Response

This project will disignate new system motorized trails and not close any existing system roads or trails. No routes will be decommissioned with this project and additional routes can be proposed in future projects.

Letter 271

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

With all the trouble in the world people need a place to go and relax and enjoy the day with friends and family. If the Forest is closed just what are we going to do that is cheap. Another thing to consider is the vandalism that will

take place just to get back at the man. The Federal Government has taken jobs and destroyed Cities and Counties that depended on the forest for money. With the closing of the forest to what little recreation depended on the forest for money. With the closing of the forest to what little recreation there is you might as well write off the small town U.S.A. Don't get me started on the safety issue that is going to affect the fire crews that protect the towns and forests.

Letter 272

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I am very concerned about the options you are considering for the Plumas National Forest. Closures of any type will further concentrate recreation on remaining trails, increase impacts, reduce forest health and harm the economy.

Letter 273

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have ridden many of the OHV trails there and have always enjoyed the area. Please keep all these trails and the area open to all to use under a managed trail plan.

Letter 274

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Classification

Resource(s): Cultural Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

As a last comment, the USFS Region 5 has even failed to respond to a letter from the Butte County Supervisor Chairman Curt Josiassen, dated November 18, 2008 stating the preferences of the Tax Payers regarding to your continued misdirected efforts to close down the publics' access to our national heritage. You people need to shape up and recognize just who it is that you work for.

Letter 275

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 9

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

There are several trails that have become overgrown and neglected; Nelson Creek is one that would offer good alternative routes to using the main road to La Porte via St. Louis. Consider applying for an OHV grant to open this up.

Letter 276

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Decisionmaking Philosophy

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

It's my opinion that there is a huge land grab going on now that we have a new administration. With no regards to what we tax paying citizens want. Red and green sticker paying hard working families pay every year so we too can enjoy everything the tree huggers want to enjoy. It's also been brought to my attention the State of California is going to grab the sticker funds since they can't responsibly manage the people's monies correctly. The only people who really want to take advantage of all these trail closures are white gay men from the bay area! If this is how our government operates what a shame!

Letter 277

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

These trails lead to vistas, scenic byways, secluded lakes, creeks and primitive camping. None of these trails have been proven to affect water quality, habitats, or plants. As a resident of La Porte and the current lack of an ongoing fuel reduction program, it is imperative that these routes and trails be left open and accessible for defense, alternate escape and search and rescue.

Letter 278

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Keeping our roads open and allowing unrestricted access to our forests is healthy for Americas it allows for the transparency of our publics land's use. If laws are passed to close the roads it will restrict access to public lands to all those Americans who obey the laws and use these public lands for a multitude of legal purposes. In addition, road closure laws will not close these roads and the lands they provide access to everyone. Closing access roads means that only honest Americans can't use the roads. The dope growers, meth makers, drug smugglers, illegal immigrants, terrorists groups, and other people who don't obey our laws anyway, can and will continue use the roads to access the lands and use them however they like. Actually the road closure laws will make illegal uses of the land more inviting to criminals as the illegal activities conducted there will be more invisible to the public and law enforcement.
America is a great country and leaving our public access roads open will help keep it that way.

Letter 279

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email

Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I grew up in Plumas County, California and believe it would be a travesty to close any of the roads in the national forest.

Response

No system roads are being closed with this project.

Letter 280

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have been very involved in the inventory process for the Plumas Forest volunteering many hours and spending a lot of my own money to make sure we followed the rules so my children and I could continue to enjoy our precious forests only to be virtually shut out according to the recent proposals. We are responsible single track OHV trail riders, hikers, mountain bikers, and occasionally travel by Jeep to remote area's in our precious forest and cherish every minute we are out there. I "sold" the idea of turning all of the trails in so they could be mapped and legal and most told me "as soon as you turn them in they will be closed forever". I am looking at the proposals and fear that they may have been closer to the truth than I was led to believe.

Comment 11

Action: Volunteer Groups and Partnerships

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Work with your volunteers to make these routes available to the people.

Comment 12

Action: Volunteer Groups and Partnerships

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

There are plenty of people ready and able to volunteer to make sure these routes to not negatively impact our forest.

Letter 281

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am very concerned with the direction that the Forest Staff intends to take with our public lands. As an avid dirt bike rider I want to see continuing access to high quality forest trail system for OHV's.

Letter 282

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

The BLM is consistently closing riding areas throughout California. The BLM has never opened up any lands to replace lands that they close. We need all available lands to ride, camp, hike and use for us now and our children later. Until a verified threat to the land is proven, all available space should be open for the public to use. It is our money through indirect taxes that pays for these recreational places in the first place. I don't feel bad about paying these taxes for the enjoyment to use the lands unless we can't because they are closed. They just took clear creek away from us. Plumas Forest is now in danger of being lost. What's next and when will this stop? Enough is enough. We have every right to use public lands.

Response

36 CFR Parts 212, 251, 261, and 295 Final Rule: Travel Management; Designated Routes and Areas for Motor Vehicle Use (November 9, 2005) requires designation of those roads, trails, and areas that are open to motor vehicle use. The prohibition on cross country travel is required by 26 CFR 261 § 261.13 Motor vehicle use. "After National Forest System roads, National Forest System trails, and areas on National Forest System lands have been designated pursuant to 36 CFR 212.51 on an administrative unit or a Ranger District of the National Forest System, and these designations have been identified on a motor vehicle use map, it is prohibited to possess or operate a motor vehicle on National Forest System lands in that administrative unit or Ranger District other than in accordance with those designations, provided that the following vehicles and uses are exempted from this prohibition."

Letter 283

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Many of the existing roads and trails offer excellent recreational use and access by OHV. Further minimizing these areas would only add to overuse and potential damage to the few areas remaining.
Please retain and provide appropriate responsible OHV access to these wonderful areas.

Letter 284

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Mitigation/BMPs

Resource(s): Soil Resources

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas Forest DEIS is a draconian document indicative of an agency managing the resource away from the users instead of for the user. The response to trail usage seems to be "gee, if there weren't so many, we would have less impact" – except that this plan will only concentrate use, creating more intense corridors of traffic and accelerated trail and habitat destruction. Allow the status quo, and focus on trail design to mitigate erosion and damage from use.

Letter 285

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I am writing in an effort to prevent the closure of over 1100 miles of existing forest roads and trails in the Plumas National Forest, which I feel are vital for recreation as well as access for management to promote forest health. I also feel that these closures would further concentrate recreation on remaining trails, increase impacts, reduce forest health and harm the economy.

Letter 286

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Once again, law abiding, tax paying OHV enthusiasts are going to get unfair treatment. This time it is in the Plumas National Forest.

Letter 287

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Enforcement/Funding/Staffing

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We as Off-roaders with green sticker vehicles are paying to help keep trails and roads open with green sticker money yet there are constant threats to close trails because of lack of funding. So my questions are: where is all that money going? Is it going to the general fund? Or is the money being "loaned" to the Sierra Club again? So they can close areas which the green sticker money is supposed to help keep open!
I pay my taxes and green sticker fees and yet every time I turn around there are more threats to close more areas to the off-road community! This needs to be stopped! If off-roaders are not allowed to use an area that was previously used as an off-road area and was closed because of the pressures and law suits of an environmental group then the area should be closed to all, if no vehicles are allowed then no foot traffic should be allowed

either!

Letter 288

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe the USFS should be accessible to all. Restricting access through this proposal is not in the best interest of society. The DEIS fails to identify conclusive significant negative impacts by allowing access, nor does it adequately address the significant impacts to the many users that would be denied access by this proposal. It does not appropriately weigh the benefits to allowing access against the potential impacts.

Letter 289

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

Please help to put a stop to one sided, enviro-whacko, minority legislation simply because they grease the governmental palm. There's no point to having public lands if the public cannot access/use them as they see fit (within the limits of established laws, of course).

Letter 290

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Scope/Scale of analysis

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Other (SEE RESPONSE)

I feel that public scoping was not done appropriately, from the beginning and continuing through the present. This was always promoted as "Off Highway Vehicles" and in fact, at the first public meetings, it was promoted as only for motorcycles and quads. We were told that it wasn't about system roads, that Fred Krueger didn't even want to discuss system roads with the public because there would be no change. Now the process has become all about system roads, changing use of the system roads (i.e. limiting use because of a new interpretation of the California Vehicle Code, changing some system roads to trails, etc). The USFS has not been honest and up front with the public.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on langauge and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads.

This policy has been disclosed to the public through the proposed action and public meetings dating back as far as 2007. The enactment of The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, in November of 2005 affected the Plumas OHV analysis underway prior to that time. Following the TM Rule, the Region set policy for mixed use. This policy was presented in town hall meetings in 2007 at Quincy, Portola and Oroville, and subsequently presented through all related discourse and documentation.

Comment 11

Action: Outreach/Education

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The DEIS doesn't really clearly say what the impacts will be on camping and firewood cutting. The public needs to know what the impact will be. And it should be put in the newspaper during the public comment period as a major topic of concern, not buried in the DEIS.

Response

The Plumas National Forest will not restrict use of dispersed campsite off system roads and trails. For specific information on reduced dispersed camping opportunities, see Recreation Section 3.2.5.1 Indicator Measure 4. Additional trails can be added in the future to access dispersed camp sites that are not adjacent to system roads and trails. Fire wood cutting is managed by the fire wood permit. Additional cutting areas can be opened by the District Ranger.

Letter 291

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Let all of us enjoy the National Forest without impacting our natural resources. Existing roads do not present a problem for wildlife and maintenance can be handled by volunteer citizens so there will be no additional costs to Plumas National Forest.

Letter 292

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+

Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

My family rides off-road motorcycles. This is a wonderful activity for us all. I am concerned that some of our favorite trails may be closed. Please keep as much trails open as possible. Particular concern for me is keeping trails connected, having a loop to ride. This is safer and more enjoyable.

Letter 293

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

After growing up in totalitarian Communist system where everything supposedly belongs to people I left for better future of mine and my children. National was in Communist interpretation not belonging to people, the nation, but almost untouchable. I'm getting scared about the future of mine that in the great United States of America the government agencies are trying or already succeeded prevent me to use what is National. So please let the people use what belong to them, we are not asking much, if you don't do anything to improve the trail don't prevent us to enjoy them.

Letter 294

Attributes

Attribute	Value
Early Attention	None

Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas Forest was put here for all to use and enjoy. Pull your tree hugging arms back and let this marvelous wonder of nature be enjoyed exactly as God, put it on earth for his creatures to do just that. You folks need to understand that the riding of OHV's is a way for families to grow and bond their relationships as we were meant to do. Check out the news media (any source) and I dare you to see how many times you find families relating their experiences in the nature, i.e.: Plumas Forest. It is because the managers of our natural forests forget how to manage the assets under their control and would rather dictate to the masses their idea's no matter how flawed those idea's are. Remember, this is the United States of America and is most greatly known as the land of the free and I am sure all of you have enjoyed the great wonders of the forests before. Take just a minute to reflect when you first experienced the views of these great marvels and say to yourself this, "can I consciously restrict the public from enjoying this beauty?

Letter 295

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

After all, what good is it to close trails and routes if the National Forest does not have access to all it has to offer? Not everyone is able to get out and hike all of the areas within these lands.

Comment 11

Action: Enforcement/Funding/Staffing

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

Enforce the rules and regulations that are in place.

Letter 296

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

My family purchased property in Plumas County because we love and enjoy the forest lands in this area. We enjoy all types of recreation in the outdoors. These activities include but are not limited to Jeeping, ATV riding, motorcycle riding, Snowmobiling, camping and hiking. I realize this make you cringe in fear of the damage we have done to your forest, but this is not true. We consider the forest every Americans property not just that of a few that hardly if ever ventures out into it, but believe they know better how to care for the land than we do. We treat the lands with respect and enjoy what it has to offer. When finished, the land is left in a condition as good if not better than we found it.

Comment 11

Action: Classification

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I have traveled many of these routes and frankly can not understand how the leaving these roads and trails open could possibly destroy the forest.

Comment 12

Action: Traffic control and safety

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

It is also a proven fact that as the area to recreate is reduced, the chance for injury or death rises dramatically. This has been proven over and over again in the SVRA's and in our cities.

Comment 13

Action: Federal Constitution, laws, acts, EOs, rules, regulations, plans

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

I find it odd that the USFS would want to reduce the total number of already open trails and roads. This seems, at face value to go against EM-7700-30 Guidelines for Engineering Analysis of Motorized Mixed Use on National Forest System Roads.

Response

EM-7700-30, Guidelines for Engineering Analysis of Motorized Mixed Use on National Forest System Roads provides direction on completing mixed use engineering reports and mitigation strategies. This document neither advocates or discourages motor vehicle use. It does not address quantification of open roads and trails.

Letter 297

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

How are we going to link the few trails left?

Letter 298

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

My wife and I visit California several times a year to ride these trails with our son and his family, who live in Northern California. We are very much opposed to what is happening in the Plumas National Forest, one of our favorite areas to ride dirt bikes.
We are conservationists as well as dirt bikers. However, all the closing of riding trails in California is extreme. It appears the over-zealous radical environmentalists rule. How sad.

Letter 299

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Alternatives General (add, change, delete)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

It seems that all of Region 5's travel management for OHV is really an OHV closure plan. It is a crying shame, and a disservice to the public at large, for the National Forests to use this route designation opportunity to curtail so much OHV access. And it doesn't just effect OHV users, it affects other users as well that depend on access to enjoy there public lands. Please consider a real off-highway vehicle alternative that correctly matches public opinion on this process.

Letter 300

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email

Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Enforcement/Funding/Staffing

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I feel that making travel restrictions too restrictive makes law abiding citizens law breakers because there is no way the government is going to be able to post signs enough to indicate whether a path route, road skid trail is open or not. The Plumas has been in a road closure policy simply because they are not maintaining current roads.

Letter 301

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

If the roads are closed this will lead to less and less people coming to the Plumas National Forest to part-take in outdoor recreational activities which will have an effect on local businesses and the local economy as a whole. Also the Plumas National Forest brings in a fair amount of money off of the sale of woodcutting permits. By closing the roads that are open now it will definitely decrease the amount of woodcutting permits sold every year, which in turn will affect the amount of money that is taken in by the Plumas National Forest. I believe that closing roads will have a negative effect on the forest and the community.

Letter 302

Attributes

Attribute	Value

Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As a resident of Plumas County for over 60 years I have yet to see damage to our area that requires total closure to those of us who live here because we enjoy being in the surrounding area be it for camping, hunting, fishing or firewood to name a few.

Time closes roads and logging opens up new ones. We are a vital part of the excess fuel removal process by permitted firewood removal. Please don't take my grandchildren's memories of this beautiful area away because of regulations we do not need.

Letter 303

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

You at the US Forest Service are telling the people what they can and can't do. Like our new President. Telling us who to listen to and not. The United States is not a Dictator Ship. Leave the roads open to the public. You at the Forest Service could be generating millions of dollars by managing your forest by logging. But you cave to environmentalists demands. Now you want to waste more tax payer dollars by tearing up roads. It's high time the US Forest Service was profitable again.

Letter 304

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I had the pleasure of meeting with some of the Plumas Rangers at the open house in Oroville on January 8, 2009. I was able to look at the maps of the Brush Creek and other areas of the Plumas Forest and get a preliminary look at the trail systems that are being presented. The closure of over 200 miles of existing motorcycle single-track trails in the Brush Creek area is poor trail management. These trails have held of very well to all types of weather and riding traffic, without any trail maintenance by Forestry personnel. The hiking trail maps as listed have left hikers with over 20 days of recreational use trails in this area and less than one day of single-track trail for the motorcyclists.

Comment 11

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Alternative modified or new alt developed (SEE RESPONSE)

Another trail that needs to be addressed is the Hansen Bar Trail. This trail has been omitted from the DEIS completely. This trail, according to the National Forest Website is currently shown with no restrictions to motorized vehicles. The topographic map of the Hansen Bar Trail shows this as an OHV trail with one of the few accesses left to the river.

Response

The Hansen Bar System Road will be show to the boundary of the Middle Fork Feather River Wild and Scenic River boundary.

Comment 12

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Another problem in the DEIS is that there is not access on route number 35 from Milsap Bar Campground to Browns Hill Ridge to Little Grass Valley Reservoir due to the OHV paved road closures which in the area is not necessary as the California Highway Patrol has stated in writing that forest roads are exempt from the California Vehicle Code Section 38001.

Response

There are several sections of pavement on this route and it should not have been shown as available for non street

legal vehicles on the Plumas National Forest Summer OHV Map.

Comment 13

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Please take into consideration the value of these single-track trails for our children and their future children. These and other trails provide good clean family entertainment and education. We have been able to raise environmentally conscientious young men that value the forests and family.

Letter 305

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Why waste money and time closing roads and trails? The types of roads and trails that are targeted to be closed are the best riding for people like me who ride ATVs, enjoying the outdoors, the scenery and the places these roads and trails can take me to. Yes there are those few bad apples out there that don't care about anything ride where they are not suppose to but why punish all of us? My family and I love riding many different roads and trails. We don't want to be forced to ride in 1 spot or be limited where we can ride. These roads and trails are there let us and all people who love riding their ATVs use these roads and trails when we want to. Closing these routes is just plain stupid.

Letter 306

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +

Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to continue to have access for gathering firewood, quad riding, hunting, fishing, backpacking and hiking for myself, my grandchildren and all future generations.

Letter 307

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As a senior citizen I am concerned about new regulations making it impossible for me to gather firewood and for me to access my usual hunting and fishing areas in the Plumas National Forest. These concerns I express for myself and for my grandchildren as well as future generations.

Letter 308

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +

Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to continue to have the ability to gather firewood for personal use and to have access for family recreation for myself, my grandchildren and future generations.

Letter 309

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe the Plumas Forest DEIS should take more time to review decisions to close certain roads prior to shutting them down. Recreation in the Plumas Forest and surrounding areas is vital to the economy of Plumas County and careful consideration should be given to the decision to close routes in the forest.

Letter 310

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +

Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Seasonal Closures

Resource(s): Transportation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

The Plumas Forest DEIS recommends certain routes be closed seasonally. Since rain can occur at any time and may not occur during periods when it is expected, I request that a rain gauge measured closure together with a drying time is superior system to closure based solely on arbitrary dates. This is done routinely in other OHV areas. Land use and access is for everyone, not just a small, exclusionist group!

Response

Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist. Precipitation data does not adequately describe saturation and soil moisture conditions so a closure based on rain gauge data alone would not accurately predict when travel on the trails would not produce soil and water impacts.

Letter 311

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I and all my family have used these lands and trails for years and to have them closed to my future family would be a shame.

Letter 312

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

The OHV community is losing trails at an alarming rate. Please do not add, no OHV, to your trail systems.

Letter 313

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

A friend of mine (Doug Monin) had the pleasure of meeting with some of the Plumas Rangers at the open house in Oroville on January 8, 2009. He was able to look at the maps of the Brush Creek and other areas of the Plumas Forest and get a preliminary look at the trail systems that are being presented. The closure of over 200 miles of existing motorcycle single-track trails in the Brush Creek area is poor trail management. These trails have held of very well to all types of weather and riding traffic, without any trail maintenance by Forestry personnel. The hiking trail maps as listed have left Hikers with over 20 days of recreational use trails in this area and less than one day of single-track trail for the motorcyclists.

Comment 11

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Analysis modified (SEE RESPONSE)

Another trail that needs to be addressed is the Hansen Bar Trail. This trail has been omitted from the DEIS completely. This trail, according to the National Forest Website is currently shown with no restrictions to motorized vehicles. The topographic map of the Hansen Bar Trail shows this as an OHV trail with one of the few accesses left to the river.

Response

The Hansen Bar System Road will be show to the boundary of the Middle Fork Feather River Wild and Scenic River boundary.

Comment 12

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

Another problem in the DEIS is that there is not access on route number 35 from Milsap Bar Campground to Browns Hill Ridge to Little Grass Valley Reservoir due to the OHV paved road closures which in the area is not necessary as the California Highway Patrol has stated in writing that forest roads are exempt from the California Vehicle Code Section 38001.

Response

There are several sections of pavement on this route and it should not have been shown as available for non street legal vehicles on the Plumas National Forest Summer OHV Map.

Letter 314

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

If the DEIS moves forward as proposed, my recreation of choice (OHV) will be affected immensely. My family and I will certainly have to find other areas to recreate in as most the alternatives do not provide a reasonable and balanced recreation opportunity.

Letter 315

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Decisionmaking Philosophy

Resource(s): Legal and Regulatory (Incl. Process)

Disposition: Resolved: Comment acknowledged; does not provide new information

I am shocked that these following issues even have to be argued. Using underhanded methods to cater to environmental pressure groups is not only un-constitutional, but at its core is utterly deceitful. Please let reality and common sense rule your decisions.

Letter 316

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Disabled and elderly use

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have a handicapped child, without using a motorized vehicle; he will be unable to access forests and public lands. Isn't this violating Federal Law and inviting additional lawsuits?

Response

Wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle in § 212.1 of the final rule, even if they are battery powered. However, there is no legal requirement to allow people with disabilities to use OHVs or other motor vehicles on roads, trails, and areas closed to motor vehicle use because such an exemption could fundamentally alter the nature of the Forest Service's travel management program (7 CFR 15e.103). Reasonable restrictions on motor vehicle use, applied consistently to everyone, are not discriminatory.

Letter 317

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

If the DEIS moves forward as proposed, my recreation of choice (OHV) will be affected immensely. My family and I will certainly have to find other areas to recreate in as most the alternatives do not provide a reasonable and balanced recreation opportunity.

Letter 318

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested

Request Information	Other request for specific information

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As the number of users has increased dramatically over the last two decades, the areas we are allowed to access have plummeted. The off road communities desperately need these trails to stay open, as the concentration of use in many areas is becoming more and more dangerous. No wonder!

Please keep the single-track trails open, particularly to motorcycles, as I believe our impact on water quality and the environment in general is minimal. Further, from my own experience and judging from my friends and the people I ride with, I believe the vast majority of trail riders are responsible, courteous and conscientious users of our public lands.

Letter 319

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Single track motorcycle routes should be considered apart from four wheel travel routes. Off road motorcycles only require a one foot wide path. I can understand closing routes that are overused by all forms of off road travel. Single track routes are the most desired by motorcycle riders and equestrians. I have been riding off road motorcycles for over 40 years and have seen the effects of all on our national forest lands. At a time when our off road license fees are being doubled, ninety million dollars of our off road fund stolen, motorcycles under eighty cc banned for sale for kids, forest service charging day use fees to park in the forest, staging areas so small at some riding areas that only ten cars will fit. The people I know love the outdoors and this sport. If it was not for them this industry would not survive at all. Please keep America open.

Letter 320

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

This is public land and should be open to the public! This "science" that recreating causes inferior water quality is a joke and you should all be ashamed to be so gullible.

Letter 321

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

My family and I have used the National Forest for responsible off road recreation for many years. Limiting our access or use of our land is not an action that is in the best interest off million of tax paying citizens. Please keep this National Forest in tack for responsible off road use.

Letter 322

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I'm writing you today to express my desire to keep as many trails and unimproved National Forest roads open as possible. I would also like to make a request that when determining what trails will stay open to keep in mind how those trails will connect with other trails. Many of the proposed route maps I've seen don't take this vitally important aspect into consideration. When riding an unlicensed motorcycle it's just not worth the trouble and effort to keep loading and unloading your motorcycle to connect trails.

Letter 323

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Action not Specified

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Plumas National Forest is an area that I enjoy with my family and my church's OHV riding club. My two young boys and I spend many hours enjoying the natural beauty of the area. The access we now have is critical to our continued family recreation in the area.

Letter 324

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

As an OHV user and an outdoor enthusiast, I, naturally, object to the closure of any OHV trails, thus my letter, regarding the DEIS alternatives.

Letter 325

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Our forests are wonderful resources that everyone should be able to enjoy. They should be left open for all types of recreation. With the closures of many trails in many of the forests, I am afraid that we will see too many people crowded onto the trails and spaces that are left open. I know that government is cutting back on the people that are employed by the forests, all the more reason to let people have their spaces for quiet time, fishing, hunting, camping, hiking, bird watching and other wildlife watching, viewing the plants in all the seasons, and of course off road travel. Less space will cause more problems. Just one more forest that I am asking to please consider leaving trails open.

Letter 326

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have included these comments because they address serious concerns about closing trails on land that my tax dollars pay for. I feel as a taxpayer that if I am responsibly using the land I have the right to use it in a responsible manner. Completely removing access to the land is unacceptable. I disagree strongly with closing the trails.

Letter 327

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

It is sad that OHV areas all over the country continue to close when responsible riders have cleaned up half of the areas that I know of. There are two areas that I personally ride that were full of beer bottles and shotgun shells for 10s of years prior to a trail system being put in and my off road motorcycle club spending about 5-6 years but eventually cleaning the places up.

I have 3 young children that enjoy off road motorcycle riding and I feel that it creates an important bond and good family values. It is always a shame to see proposals to take these areas away.

Letter 328

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Seasonal Closures

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

The Plumas Forest DEIS recommends certain routes be closed seasonally. Since rain can occur at any time and may not occur during periods when it is expected, I request that a rain gauge measured closure together with a drying time is superior system to closure based solely on arbitrary dates. This is not management. If there are no funds to use a system that is based on actual on the ground conditions. Then obviously the closures will be not enforceable.

Letter 329

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Disabled and elderly use

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We need these routes and trails. I have traveled these areas since childhood on foot and by OHV. Now I'm older with a bad back and other worn out parts and need the use of OHV to access these areas as I have always done and loved. Our population is getting older and more numerous. We actually need more access, not less.

Comment 11

Action: Outreach/Education

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Education, and not reduced freedom, is what will keep the environment healthy. OHV recreation is a vital industry that must be nourished and not vilified.

Comment 12

Action: Classification

Resource(s): Multiple

Disposition: Resolved: Comment acknowledged; does not provide new information

Please keep the roads open in the name of freedom, safety, the American with Disabilities Act and for a healthy economy.

Letter 330

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Roads and Trails (incl. access general)

Resource(s): Land Designation and Management

Disposition: Resolved: Comment acknowledged; does not provide new information

I believe what the Forest Service is doing is wrong, the Forest Service is taking land away from the people, they are not doing their jobs, and the forest service should be managing the forest not managing people.

Letter 331

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +

Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Adequacy of Studies (Best Available Science)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to continue enjoying our land in a responsible and respectful manner. The off road community know the pressure is on to eliminate this beautiful area for our enjoyment, but there must first be reasonable cause for this closure. I ask that the law makers be reasonable and do an honest research toward their decision making. The closure of Plumas Forest to off road enthusiasts will affect the balance of social and economic values.

Letter 332

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Restoration/Reclamation/Bonding

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

Why are we closing more land when we getting billons of dollars from the OHV fund!

Letter 333

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +

Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I feel the he following trails should be included in the preferred alternative for the Plumas National Forest. I cannot find data that supports omitting these routes:
Trails 5m15, 5m18, 5m21, 5m22, 5m23, 5m27, 5m25a, 4m02, 5m30 which are all off of Pulga Road.
6m13, 6m26 and 6m27(otherwise riders are forced to use road 119) 6m21, 7m10, 6m23a of Four Trees Rd.
The narrow single track trails mentioned above are very important to motorcycle trail riders. The slow speed of these trails makes them safer when compared to a wide 40 quad trail. Quad friendly trails increase trail use and negative environmental impact. Removing trail obstacles also increases trail speeds and decreases rider safety. I would like to highlight that not all OHV users are looking for wide smooth, "maintained" routes. In fact, the managed areas at Elkins Flat, Gold Note and Rock Creek represent a dumbing down of system trails. While I do support the inclusion of such routes for Quads and inexperienced riders, they should only be small part of a well-managed trail system.

Response

See Appendix A. All these routes have an "Extreme" resource mitigation that will require relocations and new trail construction that is outside the scope of this project. The full length of each proposed trail was field surveyed. Route-specific summaries of field survey information, soil and water effects, and prescribed mitigations are presented in Appendices F, G and H of the Soil and Water Resource Report.

Comment 11

Action: Multiple Use Emphasis

Resource(s): Recreation

Disposition: Resolved: Other (SEE RESPONSE)

I would like to encourage the Plumas National Forest to use mixed use designations on forest level 3 roads. The CHP letter dated 12-19-2007 allows much more discretion than R5 attempted. These roads are good transfer sections to connect trails and provide more opportunity for Quads. I would like to caution against putting extreme limits on motorized wheeled vehicles by confining them in small areas. This confinement could cause greater environmental harm due to the concentrated use by a growing user base, decreases public safety by forcing an increasing number of users onto a system that will be congested and eventually dangerously overcrowded, and limits high-quality access to much of the forest.

Response

The Travel Management Rule (TM), 36 CFR 212, 251, 261, and 295, super cedes past practices and enforcement of OHV use on the National Forests. In consideration of public safety and to best comply with State traffic laws, as required by the TM Rule, the Pacific Southwest Region, R5, has adopted a policy that equates Forest Service roads maintained for passenger vehicle use to roads defined as "highways" under the California Vehicle Code (CVC). In making this determination, the Forest Service has aligned OHV use on FS Maintenance Level 3, 4 and 5 roads to CVC restrictions and requirements for OHV use on highways. This policy was further clarified by the Regional Forester by letter, dated January 13, 2009, entitled Motorized Mixed Use on National Forest Roads in the Pacific Southwest Region. Travel Management on the Plumas NF is consistent with this direction.

The agency has discretion in determining appropriate regulations for OHV use in consideration of public safety. Modelling FS policy based on langauge and regulation within the California Vehicle Code was determined to provide the most consistency with State law and the most prudent means to avoid high risk and high severity OHV accidents. Letters from California Highway Patrol provide opinion of that agency but do not mandate Forest Service policy. The Regional Forester has authority to determine whether to allow mixed use on Forest System Roads.

The Plumas NF Public Motorized Travel Management Plan provides approximately 3400 miles of system roads and 390 miles of motorized trails for recreational OHV use. Approximately 630 miles are restricted to licensed vehicles as Maintenance Level 3, 4, or 5 roads. The nearly 3800 miles of roads and trails available for OHV use provide many

connected networks that accommodate extensive riding without the need to use Level 3, 4 and 5 roads as links. All geographic areas of the Forest contain road and trail networks available to OHV recreationists.

Comment 12

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I would like to thank the Plumas National Forest for the hard work you have done to put fourth an OHV route designation plan, with a reasonable proposed preferred alternative. OHV enthusiasts support managed OHV recreation. We want a legal, sustainable, network of roads and trails with varying degrees of difficulty to provide access for the public to recreate and enjoy our public lands.

Letter 334

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

I had the pleasure of meeting with some of the Plumas Rangers at the open house in Oroville on January 8, 2009. I was able to look at the maps of the Brush Creek and other areas of the Plumas Forest and get a preliminary look at the trail systems that are being presented. The closure of over 200 miles of existing motorcycle single-track trails in the Brush Creek area is poor trail management. These trails have held of very well to all types of weather and riding traffic, without any trail maintenance by Forestry personnel. The hiking trail maps as listed have left Hikers with over 20 days of recreational use trails in this area and less than one day of single-track trail for the motorcyclists.

Comment 11

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Analysis modified (SEE RESPONSE)

A trail that needs to be addressed is the Hansen Bar Trail. This trail has been omitted from the DEIS completely. This trail, according to the National Forest Website is currently shown with no restrictions to motorized vehicles. The topographic map of the Hansen Bar Trail shows this as an OHV trail with one of the few accesses left to the river.

Response

The Hansen Bar System Road will be shown to the boundary of the Middle Fork Feather River Wild and Scenic River boundary.

Comment 12

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

A problem in the DEIS is that there is not access on route number 35 from Milsap Bar Campground to Browns Hill Ridge to Little Grass Valley Reservoir due to the OHV paved road closures which in the area is not necessary[.]

Response

There are several sections of pavement on this route and it should not have been shown as available for non street legal vehicles on the Plumas National Forest Summer OHV Map.

Comment 13

Action: Action not Specified

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Within the Plumas National Forest there are trails that are only accessible by using portions of paved roads. The current map structure closes these roads to all off-road vehicles.

Response

Licensed vehicles may use paved roads including duel sport motorcycles. We will work in the future to construct new trails that provide important loop and link access to avoid paved roads.

Comment 14

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

Please take into consideration the value of these single-track trails for our children and their future children. These and other trails provide good clean family entertainment and education. We have been able to raise environmentally conscientious young men that value the forests and family.

Letter 335

Attributes

Attribute	Value
Early Attention	None

Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

My husband had the pleasure of meeting with some of the Plumas Rangers at the open house in Oroville on January 8, 2009. He was able to look at the maps of the Brush Creek and other areas of the Plumas Forest and get a preliminary look at the trail systems that are being presented. The closure of over 200 miles of existing motorcycle single-track trails in the Brush Creek area is poor trail management. These trails have held up very well to all types of weather and riding traffic, without any trail maintenance by Forestry personnel. The hiking trail maps as listed have left Hikers with over 20 days of recreational use trails in this area and less than one day of single-track trail for the motorcyclists.

Comment 11

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Analysis modified (SEE RESPONSE)

A trail that needs to be addressed is the Hansen Bar Trail. This trail has been omitted from the DEIS completely. This trail, according to the National Forest Website is currently shown with no restrictions to motorized vehicles. The topographic map of the Hansen Bar Trail shows this as an OHV trail with one of the few accesses left to the river.

Response

The Hansen Bar System Road will be shown to the boundary of the Middle Fork Feather River Wild and Scenic River boundary.

Comment 12

Action: Other/Unspecified

Resource(s): Transportation, Site Specific

Disposition: Resolved: Comment acknowledged; does not provide new information

A problem in the DEIS is that there is not access on route number 35 from Milsap Bar Campground to Browns Hill Ridge to Little Grass Valley Reservoir due to the OHV paved road closures which in the area is not necessary[.]

Response

There are several sections of pavement on this route and it should not have been shown as available for non street legal vehicles on the Plumas National Forest Summer OHV Map.

Comment 13

Action: Action not Specified

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

Within the Plumas National Forest there are trails that are only accessible by using portions of paved roads. The current map structure closes these roads to all off-road vehicles.

Response

Licensed vehicles may use paved roads including duel sport motorcycles. We will work in the future to construct new trails that provide important loop and link access to avoid paved roads.

Comment 14

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

Please take into consideration the value of these single-track trails for our children and their future children. These and other trails provide good clean family entertainment and education. We have been able to raise environmentally conscientious young men that value the forests and family.

Letter 336

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I am fully aware of your agencies responsibility to oversee a large array of user group activities and those activities potential consequences to the forest health, the user's interaction, and the wildlife that we share the forest with. I am also aware of the fiscal limitations the Plumas must be experiencing, and the lack of manpower and time available to devote to this undertaking. I ask that you, as a public agency, take full consideration of the fact that if more of the forest user population is using one means of recreation (OHV), that recreation type should be enhanced and expanded if possible. Not reduced!

Comment 11

Action: Seasonal Closures

Resource(s): Recreation

Disposition: Resolved: Analysis modified (SEE RESPONSE)

I am opposed to any one size fits all management decisions that some anti access groups want for the entire

National Forest system. I relate this locally to "weather related seasonal closures". I know this a fiscal and staffing related issue, but this is public land that the public is unreasonably being shut out of using.

Response

Season of Use restriction are only placed on trail with resource concerns that can be mitigated with use restrictions. Section 3.5.6.2 has been revised to include more information on the development of the season of use mitigation for soil and water resource effects. Due to unpredictable changes in climate, the season of use could change with Forest Supervisor or District Ranger authority. During dry years, there are typically large and frequent precipitation events in December, and a drying off time period in January and February, and wet period again in March. The soils could be dry enough to travel on without causing trail tread damage. During dry years, the Forest Supervisor or District Ranger has the authority to suspend portions of the prescribed season of use restriction when appropriate weather and soil moisture conditions exist.

Comment 12

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Socioeconomics

Disposition: Resolved: Comment acknowledged; does not provide new information

I ask that you consider the local economy. If a user has a poor recreation experience, that user will go elsewhere next time. The locals then suffer as well as the user. This is a bad time to negatively impact the small towns in and around the Plumas National Forest.

Response

With the publishing of quality OHV recreation maps, it is expected that people unfamiliar with the Plumas National Forest will start riding trails that are currently not on any maps. We expect the public riding experience will increase with a cohesive well designed recreation OHV system.

Letter 337

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	Other request for specific information

Comment 10

Action: Motorized (ATV, OHV, Snowmobile, etc.)

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I'm an avid off-road person logging many miles on my ATV and dirt bikes. My family and I love to ride this area. The world of off roading is such a great family sport along with the hunting and fishing I do with my six children. So many fond memories have been made on weekend outings riding ATVs.

I would have to ask you if you have ever visited this place you want to close down? How much time do you spend enjoying our state and national parks? I'll bet it's not at all! I am also an ATV and dirt bike instructor. I know the

lands can be managed for use by all.

Letter 338

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Action not Specified

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I use these trails to access hunting and fishing grounds. Often times this is done on my dirt bike. I pay a lot of money in taxes and I'm happy to do so as long as [I] live in a country that allows me the freedom to hunt and fish in these forests.

Letter 339

Attributes

Attribute	Value
Early Attention	None
Response Type	Form or LG +
Delivery Type	Email
Form	2+
Comment Extension	No extension requested
Request Information	None

Comment 10

Action: Classification

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

I have been involved in the PNF's OHV management plans since the first meetings in Oroville. As a motorcycle, 4x4

and mountain bike enthusiast (as well as a winter snowmobile enthusiasts) out of the Prattville area, I have an intimate knowledge of the trails and roads in my area that I have ridden and enjoyed. None of them have shown, to my knowledge, any significant "resource damage" from their use or from the occasional cross country excursion. I don't think there is any reasonable justification for the deletion of any of the trails that were inventoried from the proposed OHV maps, especially where there was no "on the ground" evaluation, with the involvement of the affected users, of the deleted routes.

Response

All proposed trails had to be surveyed by resource specialist to access their suitability to be included in our designated motorized trail system. Additional routes can be added in the future with additional analysis.

Comment 11

Action: Mitigation/BMPs

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

We were told early on that if a route had a significant problem, we would have the opportunity to work on mitigation measures to retain the route users, stewards and the cognizant USFS people. It seems this option has been totally removed from consideration.

Response

The Plumas National Forest will be working extensively with users to mitigate trails with High mitigation ratings in order to have them included on the Motor Vehicle Use Map.

Letter 340

Attributes

Attribute	Value
Early Attention	None
Response Type	Letter
Delivery Type	Email
Comment Extension	No extension requested
Request Information	None

Comment 1

Action: Decisionmaking Philosophy

Resource(s): Transportation

Disposition: Resolved: Comment acknowledged; does not provide new information

I was surprised to hear Cynthia Lusk say she did not have input in the process. It seems to me that OHV riding is a part of the recreational use of the forest. I would think the Forest Service's recreation staff should be very involved in this process.

Going back to when both the FS and public mapped miles of trails, and the public was told to make sure their favorite trails/roads were on the map, the public thought the reason was to keep them, not to delete them. Apparently the results of that process is now known as Alternative 1 and seems to have been used for the purpose of removing riding areas rather than keeping them.

I feel frustrated, I don't have the time (Or desire to spend my time this way) to study each map, to understand

where it is in relation to a current FS map or read the huge book. It would be so helpful if each alternative was an overlay so the differences were obvious between 1 to 5 and the latest FS map we are familiar with.

It is my feeling much of the process was done from a desk rather than by those looking at the road involved. I think some old fashioned common sense got left out in some places.

Comment 2

Action: See Attachment

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 1]: Letter from Jim and Kay Farris to: Alice Carlton regarding Access to Public Lands. Date: January 23, 2008.

Comment 3

Action: See Attachment

Resource(s): Recreation

Disposition: Resolved: Comment acknowledged; does not provide new information

[ATT 2]: Letter response from Michael Donald to Kay regarding response to OHV comments. Date: January 29, 2009.