## Plumas National Forest Over-snow Vehicle Use Designation

## Final Environmental Impact Statement

## Volume III. Appendices F through L



Forest Service

Cover image: Snowmobiling at Round Valley Reservoir, Plumas National Forest, Plumas County, California. Photograph taken January 14, 2017 by Erika Brenzovich.

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# Over-snow Vehicle Use Designation Final Environmental Impact Statement Plumas National Forest 

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#### Abstract

The Forest Service proposes to designate snow areas and trails for public over-snow vehicle (OSV) use on the Plumas National Forest. These designations would occur on National Forest System lands within the Plumas National Forest. The Forest Service would also identify designated snow trails where grooming for public OSV use would occur within the Plumas National Forest.


This final environmental impact statement (FEIS) discloses the comparative analysis of the options being considered in designating areas and trails of the Plumas National Forest for OSV use. We consider the environmental impacts of a proposed action, a no-action alternative, and four additional action alternatives developed in response to issues, public comments received during the scoping period; multiple interdisciplinary team discussions; coordination with project stakeholders; literature review; and application of the Minimization Criteria (36 CFR 212.55(b)(1-4)).
\(\left.$$
\begin{array}{ll}\text { Mail objections to: } & \begin{array}{l}\text { Randy Moore, Regional Forester } \\
\text { USDA Forest Service }\end{array}
$$ <br>
\& Pacific Southwest Region <br>
Attn: Plumas OSV Objection <br>
\& 1323 Club Drive <br>

Vallejo, CA 94592\end{array}\right]\)|  | objections-pacificsouthwest-regional-office@fs.fed.us |
| :--- | :--- |
| Email objections to: | Subject: Plumas OSV Objection |
| Objection period: | The 45-day objection period starts the day after the Legal Notice to <br>  |
|  | Object is published in the Feather River Bulletin. |

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## Appendix F. Noxious Weed Risk Assessment

Five factors of weed spread were analyzed for the proposed Plumas National Forest OSV Use Designation Project. Discussions and determinations of risk (high, moderate, and low) are presented below along with the total risk of weed spread for the proposed project.

## Summary

For all alternatives, the Plumas OSV Use Designation Project carries an overall low risk of spreading or introducing weeds. Existing factors of weeds already present, habitat vulnerability, and non-project weed vectors carry a moderate risk, but no habitat alteration and a relatively small amount of increased weed vectoring is expected from this project.

## Introduction

Noxious weeds generally possess one or more of the following characteristics: aggressive and difficult to manage; poisonous; toxic; parasitic; a carrier or host of serious insects or disease; or being nonnative, new, to or not common to the United States or parts thereof (Forest Service Manual 2900). In order to control noxious weeds the U.S. Forest Service has adopted an integrated weed management approach to reduce the spread of noxious weeds on to, and from, National Forest System lands. The main objective of this integrated approach to weed management is to prevent the introduction and establishment of noxious weed infestations, and control (contain and suppress) existing noxious weed infestations on National Forest System lands (Forest Service Manual 2900). In addition, when any ground-disturbing action or activity is proposed, the Federal agency is required to determine the risk of introducing or spreading noxious weeds associated with the proposed action (Forest Service Manual 2900). On the Plumas National Forest, roadside weed infestations are routinely treated during their active growing season each year.

In the Plumas OSV project area, 50 invasive plant species are documented. The table below shows a list of weed species and their acreage of presence near OSV trails and in areas designated for OSV use.

The most likely places for possible weed introductions are in areas of concentrated OSV use, such as designated trails and trailheads. OSV trailheads are also accessible by wheeled vehicles during the summer seasons, so the presence of weeds does not necessarily indicate they were brought to the sites as a result of OSV activities. Although there are some differences in designated OSV trails in each alternative, the locations and uses of seven OSV trailheads would be the same for all alternatives. The following weeds have been found within a quarter mile of the OSV trailheads:

- Big Creek - yellow starthistle is present
- Bucks Summit - yellow starthistle is present nearby
- Gold Lake - no weeds documented
- La Porte - no weeds documented
- Four Trees, Mooreville, Onion Valley, Sawmill Ridge, and South Fork warming huts - no weeds documented


## 1. Noxious Weeds Present In or Near Project Area (Moderate)

Invasive plant inventories are not complete. Invasive species information for much of the private land in the project area is lacking, but it is assumed that similar infestations exist on private as occur on National Forest System lands. Additional infestations and invasive species are likely present and unreported.

Documented invasive plants in the Plumas OSV Use Designation project area include the following 40 species:

Table F-1. Weed infestations in the Plumas OSV use designation project area.

| Scientific Name Common Name | Acres on Plumas National Forest | Acres in High-Use Areas | Acres in Areas Designated for OSV Use |
| :---: | :---: | :---: | :---: |
| Acroptilon repens hardheads | 1.7 | 0 all alternatives | $\begin{gathered} \text { 1.7 Alts. 1, } 4 \\ 0 \text { Alt. } 2 \\ 0.6 \text { Alt. } 3 \\ 0 \text { Alt. } 5 \end{gathered}$ |
| Aegilops cylindrical jointed goatgrass | 0.2 | 0 all alternatives | $\begin{gathered} 0.2 \text { Alt. 1, } 4 \\ 0 \text { Alts. 2, } 3,5 \end{gathered}$ |
| Aegilops triuncialis barbed goatgrass | 416 | 0 Alts. 1, 3, 5 <br> 0.2 Alt. 2 <br> 0.8 Alt. 4 | $\begin{gathered} 408 \text { Alts. 1, } 4 \\ 0.2 \text { Alt. } 2 \\ 1 \text { Alts. 3, } 5 \end{gathered}$ |
| Ailanthus altissimum tree of heaven | 2.4 | 0 all alternatives | $\begin{aligned} & \text { 2.2 Alts. 1, } 4 \\ & 0 \text { Alts. 2, 3, } 5 \end{aligned}$ |
| Bromus tectorum cheatgrass | 0.5 | 0 Alts. 1, 2, 3, 5 0.5 Alt. 4 | $\begin{gathered} \text { 0.5 Alts. 1, 2, } 4 \\ 0 \text { Alts. 3, } 5 \end{gathered}$ |
| Cardaria draba whitetop | 0.1 | 0 all alternatives | $\begin{gathered} \text { 0.1 Alts. 1, 2, } 4 \\ 0 \text { Alts. 3, } 5 \end{gathered}$ |
| Cardaria pubescens hairy whitetop | 0.4 | 0.1 all alternatives | $\begin{gathered} \text { 0.4 Alts. 1, } 4 \\ \text { 0.2 Alt. } 2 \\ \text { 0.1 Alts. 3, } 5 \end{gathered}$ |
| Carduus nutans nodding plumeless thistle musk thistle | 12 | 0 Alts. 1, 2, 3, 5 9 Alt. 4 | $\text { 6.3 Alts. } 1,2,4,5$ <br> 0.5 Alt. 3 |
| Carduus pycnocephalus Italian plumeless thistle | 1.6 | 0 all alternatives | $\begin{aligned} & \text { 1.6 Alts. } 1,4 \\ & 0 \text { Alt. 2, 3, } 5 \end{aligned}$ |
| Centaurea jacea brownray knapweed | 0.3 | 0 all alternatives | 0.2 Alts. 1, 4 <br> 0 Alts. 2, 3, 5 |
| Centaurea solstitialis yellow starthistle | 810 | 1.7 Alts. 1, 3, 5 4 Alt. 2 27 Alt. 4 | $\begin{gathered} 790 \text { Alts. 1, } 4 \\ 104 \text { Alt. } 2 \\ 10 \text { Alt. } 3 \\ 23 \text { Alt. } 5 \end{gathered}$ |
| Centaurea stoebe sspage Micranthos spotted knapweed | 17 | 0.1 Alts. 1, 2, 3, 5 8 Alt. 4 | 17 Alts. 1, 2, 4 5 Alts. 3, 5 |
| Centaurea virgata sspage Squarrosa squarrose knapweed | 0.1 | 0 all alternatives | $\begin{gathered} \text { 0.1 Alts. 1, } 4 \\ 0 \text { Alts. 2, } 3 \end{gathered}$ |
| Chondrilla juncea rush skeletonweed | 19 | 0 all alternatives | $\begin{aligned} & \text { 18 Alts. 1, } 4 \\ & \text { 1.8 Alt. } 2 \\ & 0 \text { Alts. } 3,5 \end{aligned}$ |


| Scientific Name Common Name | Acres on Plumas National Forest | Acres in High-Use Areas | Acres in Areas Designated for OSV Use |
| :---: | :---: | :---: | :---: |
| Cirsium arvense Canada thistle | 520 | 18 Alts. 1, 3, 5 33 Alt. 2 347 Alt. 4 | $\begin{gathered} 519 \text { Alts. 1, } 4 \\ 505 \text { Alt. } 2 \\ 442 \text { Alt. } 3 \\ 461 \text { Alt. } 5 \end{gathered}$ |
| Cirsium vulgare bull thistle | 6.2 | 3.8 all alternatives | $\begin{gathered} \text { 6.1 Alts. 1, } 4 \\ \text { 4 Alt. } 2 \\ \text { 3.8 Alts. } 3,5 \end{gathered}$ |
| Convolvulus arvensis field bindweed | 0.4 | $\begin{gathered} 0 \text { Alts. } 1,2 \\ 0.1 \text { Alts. 3, 4, } 5 \end{gathered}$ | $\begin{gathered} \text { 0.4 Alt. 1, } 4 \\ 0.1 \text { Alt. 2, } 3,5 \end{gathered}$ |
| Cytisus scoparius Scotch broom | 438 | $\begin{gathered} \text { 0.1 Alts. } 1,2,3,5 \\ 0.4 \text { Alt. } 4 \end{gathered}$ | 335 Alt. 1 20 Alt. 2 0.2 Alts. 3,5 437 Alt. 4 |
| Digitalis purpurea foxglove | 0.2 | 0 all alternatives | $\begin{gathered} \text { 0.2 Alts. 1, } 4 \\ 0.1 \text { Alt. } 2 \\ 0 \text { Alts. } 3,5 \end{gathered}$ |
| Dittrichia graveolens stinkwort | 388 | 0 all alternatives | $\begin{gathered} 380 \text { Alt. } 1 \\ 0 \text { Alts. 2, } 3,5 \end{gathered}$ |
| Elymus repens quackgrass | 15 | 11 all alternatives | 15 Alt. 1 <br> 15 Alt. 2 <br> 15 Alt. 3 <br> 15 Alt. 4 <br> 4.5 Alt. 5 |
| Genista monspessulana French broom | 128 | 0 all alternatives | $\begin{aligned} & 80 \text { Alt. } 1 \\ & 0 \text { Alts. 2, } 3,5 \\ & 127 \text { Alt. } 4 \end{aligned}$ |
| Hedera helix English ivy | 3.7 | 0 all alternatives | 3.6 Alt. 1 <br> 0.1 Alt. 2 <br> 0 Alts. 3, 5 <br> 3.7 Alt. 4 |
| Hypericum perforatum common St. John's wort | 3.3 | 0.7 all alternatives | 3.3 Alts. 1, 2, 4 0.1 Alt. 3 <br> 0.7 Alt. 5 |
| Isatis tinctoria dyer's woad | 7.5 | $\begin{aligned} & \text { 0.1 Alts. } 1,2,3,5 \\ & 2.5 \text { Alt. } 4 \end{aligned}$ | $\begin{gathered} \text { 7.5 Alts. 1, } 4 \\ \text { 7.4 Alt. } 2 \\ \text { 3.8 Alts. } 3,5 \end{gathered}$ |
| Lepidium latifolium perennial pepperweed | 420 | $\begin{gathered} \text { 0.3 Alts. 1, } 2 \\ \text { 1.6 Alts. 3, } 5 \\ 0.4 \text { Alt. } 4 \end{gathered}$ | $\begin{gathered} \text { 418 Alt. 1, } 4 \\ \text { 416 Alt. } 2 \\ \text { 0.4 Alt. } 3 \\ 0.5 \text { Alt. } 5 \end{gathered}$ |
| Linaria dalmatica Dalmatian toadflax | 0.2 | 0.1 all alternatives | $\begin{gathered} \text { 0.2 Alts. 1, } 4 \\ \text { 0.1 Alts. 2, } 3,5 \end{gathered}$ |
| Linaria vulgaris butter and eggs | 0.1 | 0 all alternatives | 0.1 all alternatives |
| Phytolacca americana var. americana American pokeweed | 0.8 | 0 all alternatives | $\begin{gathered} \text { 0.3 Alt. } 1 \\ 0 \text { Alts. 2, 3, } 5 \\ 0.8 \text { Alt. } 4 \end{gathered}$ |
| Potentilla recta Sulphur cinquefoil | 0.3 | 0 Alt. all alternatives | $\begin{gathered} 0.3 \text { Alt. 1, } 4 \\ 0 \text { Alts. 2, 3, } 5 \end{gathered}$ |


| Scientific Name Common Name | Acres on Plumas National Forest | Acres in High-Use Areas | Acres in Areas Designated for OSV Use |
| :---: | :---: | :---: | :---: |
| Robinia pseudoacacia black locust | 3.3 | 0.6 all alternatives | 1.4 Alt. 1 <br> 0.7 Alts. 2, 3, 5 3.2 Alt. 4 |
| Rubus armeniacus Himalayan blackberry | 112 | 0.1 all alternatives | 111 Alt. 1, 4 4.8 Alts. 2 0.1 Alt. 3, 5 |
| Salsola tragus prickly Russian thistle | 0.1 | 0 Alts. 1, 2, 3, 4, 5 | 0.1 all alternatives |
| Silybum marianum blessed milkthistle | 0.1 | $0 \text { Alts. 1, 2, 3, } 5$ $\text { 0.1 Alt. } 4$ | 0.1 all alternatives |
| Sorghum halapense Johnsongrass | 0.2 | 0 all alternatives | $\begin{gathered} 0.1 \text { Alt. } 1 \\ 0 \text { Alts. 2, 3, } 5 \\ 0.2 \text { Alt. } 4 \end{gathered}$ |
| Spartium junceum Spanish broom | 2.8 | 0 all alternatives | $\begin{gathered} \text { 2.8 Alt. 1, } 4 \\ 0 \text { Alts. } 2,3,5 \end{gathered}$ |
| Taeniatherum caput-medusae medusahead | 289 | $\begin{gathered} 0 \text { Alts. 1, 3, } 5 \\ 0.5 \text { Alt. } 2 \\ \text { 3.2 Alt. } 4 \end{gathered}$ | $\begin{gathered} 287 \text { Alt. 1, } 4 \\ 49 \text { Alt. } 2 \\ \text { 1.5 Alt } 3 \\ 0.7 \text { Alt. } 5 \end{gathered}$ |
| Tanacetum vulgare common tansy | 0.3 | 0.1 Alt. all alternatives | $\begin{gathered} \text { 0.3 Alt. 1, } 4 \\ 0.2 \text { Alts. 2, } 3 \\ 0.1 \text { alt. } 5 \end{gathered}$ |
| Vinca major bigleaf periwinkle | 4.1 | 0 all alternatives | $\begin{gathered} \text { 3.4 Alt. } 1 \\ 0 \text { Alts. 2, 3, } 5 \\ \text { 4.1 Alt. } 4 \end{gathered}$ |
| TOTAL | 3,625 | 36 Alt. 1 (14 species) <br> 55 Alt. 2 ( 13 species) <br> 38 Alt. 3 (15 species) <br> 415 Alt. 4 (20 species) <br> 38 Alt. 5 (15 species) | 3,421 Alt. 1 <br> 1,151 Alt. 2 <br> 485 Alt. 3 <br> 3,574 Alt. 4 <br> 511 Alt. 5 |

## 2. Habitat Vulnerability (Moderate)

The areas proposed for OSV use includes a wide variety of habitat types, including montane forests, subalpine areas, open slopes, meadows, and other areas. Most of these areas are dominated by native vegetation that is adapted to a range of disturbances and variable weather conditions. The areas designated for cross-country OSV use are generally occupied by resilient plant communities. However, invasive plants could still become established in some areas, particularly those where vegetation is sparse. The designated OSV trails are almost entirely on roads or trails that are used in the summer season, so the more concentrated OSV use (along the designated trails) would occur along these linear features, which are in a recurring state of disturbance due to vehicle uses and maintenance. The factor of habitat vulnerability carries a moderate level of risk because invasive plants could relatively easily invade portions of this project area.

## 3. Non-Project Weed Vectors (Moderate)

Weed vectors currently in the project area and vicinity include off-highway vehicles (OHVs) such as motorcycles and four-wheel drive vehicles; road maintenance equipment; recreationists; private cars and trucks; Forest Service vehicles and workers; logging equipment on private land and National Forest

System land; and wildlife. Natural dispersal from wind may also spread the seeds of some invasive species into the project area. Wildlife may also disperse certain noxious weeds that can become attached to fur, or when viable seeds pass through digestive systems. Vehicles traveling routes and roads may pick up seeds from existing infestations and spread them to other locations on the forest. For some species, seeds can become affixed to clothing and gear (for example, nonnative annual grasses). Other species do not have dispersal mechanisms for attachment and would most likely travel in mud on vehicles and tire tread (for example, yellow starthistle, and Scotch broom).

Several travel corridors are present, including highways, forest roads, and trails. Most invasive species known in the project area occur along roads. For these reasons, a moderate risk is attributed to non-project weed vectors.

## 4. Habitat Alteration Expected as Result of Projects (None)

No habitat alteration is expected from OSV activities. The proposed OSV uses may cause some damage to woody plants that extend into or out of the snow cover during periods of use, but this would not cause the plant communities to be altered.

## 5. Increased Vectors as a Result of Project Implementation (Low)

Although seed dispersal by vehicles is a major vector for weed invasions (Ouren et al. 2007, Von der Lippe and Kowarik 2007, Taylor et al. 2011), no literature or observational evidence was found to indicate that invasive plants are spread by OSV use or grooming activities. However, it is possible that some weed introduction or expansion could result from these uses. OSVs could bring weed seeds into the project area, especially if the OSVs, their trailers, or both are stored outside near or within weed infestations. Throughout the seasons of non-use (spring, summer, and fall), weed species are actively growing and producing seed, which may get deposited on OSVs and trailers that are stored outside, particularly during windy conditions or if weeds are growing in close proximity. Any possible new infestations would most likely become established at trailheads, where seeds may be brought into the area on trailers, towing vehicles, and OSVs. The movement and jarring of this equipment during unloading may dislodge soil and other debris containing weed seeds. Less likely, but still possible, is that weed seeds may be deposited by the OSVs as they travel along designated trails and through areas designated for cross-country travel, although it is unknown whether weed seeds deposited on the snow surface would remain viable and germinate when spring arrives. It is possible the majority of weed seeds brought into the area would be eaten by birds, mice, or other animals before spring conditions arrive. Considering these possibilities and uncertainties, the overall risk of OSV use increasing weed vectors is low.

## 6. Mitigation Measures

No specific mitigation measures are recommended to alleviate concerns for invasive plant spread due to this project.

## 7. Anticipated Weed Response to Proposed Action (Low Risk)

Weeds usually gain a foothold in natural communities where soil disturbance has provided suitable conditions for weed seed germination, where ground vegetation is disturbed and unable to outcompete the invaders, and (in forested areas) where tree canopy removal or thinning has allowed additional sunlight to reach the forest floor. None of these habitat-altering activities are proposed. No disturbance to soil or ground vegetation is expected. Aside from the possible introduction of weed seeds described in factor 5 above, none of the other typical factors promoting weed infestations are expected to result from OSV use.

Given the lack of evidence that OSV use contributes to weed infestations, and the low risk of the proposed activities, the overall risk of weed increases due to OSV use is expected to be low for all alternatives.

## Appendix G. How Cumulative Impacts were Considered

We considered whether the potential impacts of the alternatives would accumulate with the impacts of past, other present and reasonably foreseeable future actions in both time and geographic space (Forest Service Handbook 1909.15, Sec. 15.2). If the proposed action or alternatives being analyzed in this final environmental impact statement would result in no direct or indirect impacts, there could be no cumulative impacts. It logically follows that if the direct and indirect impacts of the action would occur within a different context than the impacts of past, present, and reasonably foreseeable future actions, there would also be no potential for impacts to accumulate in time and geographic space.

## Consideration of Past Actions

The analysis of cumulative impacts begins with consideration of the direct and indirect impacts on the environment that are expected or likely to result from the proposed action and alternatives. Once the direct and indirect impacts are determined, we look for existing (residual indirect) impacts of past actions.

Only those residual impacts from past actions that are of the same type, occur within the same geographic area, and have a cause-and-effect relationship with the direct and indirect impacts of the proposed action and the alternatives are considered relevant and useful for the cumulative impacts analysis.

To understand the contribution of past actions to the cumulative impacts of the alternatives, this analysis relies on current environmental conditions as a proxy for the impacts of past actions. This is because existing conditions reflect the aggregate impact of all prior human actions and natural events that have affected the environment and might contribute to cumulative impacts.

The cumulative impacts analysis does not attempt to quantify the impacts of past human actions by adding up all individual residual impacts of prior actions on an action-by-action basis. There are practical reasons for not taking this approach. First, a catalog and analysis of all past actions would be impractical to compile and unduly costly to obtain. Current conditions have been impacted by innumerable actions in the past, and isolating the impacts of each individual past action that might continue to have residual impacts would be nearly impossible.

Second, providing the details of past actions on an individual basis would not be useful to predict the cumulative impacts of the proposed action and alternatives. In fact, focusing on individual impacts of past actions would be less accurate than looking at existing conditions. This is because there is limited information on the environmental impacts of individual past actions and one cannot reasonably identify each and every past action that has incrementally contributed to current conditions. By looking at current conditions, we are sure to capture all the residual impacts of past human actions, regardless of which particular action or event contributed those impacts.

This practice adheres to direction in the Council on Environmental Quality's interpretive memorandum of June 24, 2005, regarding analysis of past actions, which states, "agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." For these reasons, our analysis of past actions is based on current environmental conditions.

## Consideration of Reasonably Foreseeable Future Actions

Cumulative impacts can only occur when the likely impacts resulting from the proposed action or alternatives overlap spatially and temporally with the likely impacts of reasonably foreseeable future actions (Forest Service Handbook 1909.15, section 15.2).

The Code of Federal Regulations at 36 CFR Part 220 provides direction for identifying reasonably foreseeable future actions that should be considered in the analysis of cumulative impacts. Reasonably foreseeable future actions are those federal or non-federal activities not yet undertaken, for which there are existing decisions, funding, or identified proposals" (36 CFR 220.3).
"Identified proposals for Forest Service actions are those for which the Forest Service has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal and the effects can be meaningfully evaluated (40 CFR 1508.23)" (36 CFR 220.4(a)(1)).

The relevance and usefulness of other ongoing or reasonably foreseeable future activities or events that might result in impacts that would accumulate with the specific direct and indirect impacts to specific resources depends on the context in which those direct and indirect impacts are considered. Those actions and events are discussed in the relevant resource sections.

Therefore, the other present and reasonably foreseeable future actions were considered in two phases. The first phase determined whether another present or reasonably foreseeable action was relevant and useful to the analysis. The other present or reasonably foreseeable future action would only be relevant and useful if its impacts would accumulate with the impacts of the alternative being analyzed. The second phase determined the cumulative impacts of those actions determined to be relevant and useful.

## Other Present and Reasonably Foreseeable Future Actions Considered in Cumulative Impacts Analyses

Routine maintenance occurs throughout the project area on roads and in campgrounds. Routine Forest Service use of mineral material sources occurs in these designated areas throughout the project area. Routine noxious weed management (hand pulling and digging) occurs along forest roads throughout the project area. A wide range of recreational use occurs in all seasons across the forest, and forestwide campgrounds and roads receive routine use during the months that climate conditions allow. Ongoing maintenance and use of communication sites and personal use woodcutting occur throughout the project area. Ongoing actions and reasonably foreseeable future actions include snowplowing of winter recreation parking areas.

Grazing on the Plumas National Forest is an ongoing activity. Grazing is authorized to qualified local ranching families on allotments and is administered by the Forest Service through a term grazing permit. 43 of the Plumas National Forest's 67 grazing allotments are active and livestock grazing and associated activities are taking place in these areas. Livestock grazing is administered through grazing permits which specify the ranching family authorized to graze livestock on the allotment; the name of the allotment; kind and class of livestock; number of livestock; season of grazing; designated monitoring areas (DMA), with annual compliance permit monitoring for: meadow utilization, stream bank alteration, riparian shrub use, vole hiding cover for great gray owls, fen bare peat, and willow browse use for willow flycatchers. Seral stage of meadows and functionality of streams, springs and fens are analyzed during Range Allotment NEPA, along with Heritage, Wildlife, Botany, Hydrology, Soils, and Recreation considerations. Winter snowmobile use is not expected to impact the permittee or their livestock operations because livestock are not grazed on the Plumas National Forest in the winter. Plumas National Forest range allotments are
summarized below by district with: livestock kind, season of use, animal unit months (AUMs), and allotment acres.

Table G- 1. Plumas National Forest allotments, livestock type, season of use, animal unit months, and allotment acres

| Allotment | Livestock | Season of Use | AUMs | Allotment Acres |
| :---: | :---: | :---: | :---: | :---: |
| Beckwourth Ranger District |  |  |  |  |
| Frenchman Lake | Cattle | 6/1 to 9/30 | 614 | 3,846 |
| Antelope | Cattle | 5/1 to 11/30 | 889 | 24,574 |
| Bass | Cattle | 6/1 to 9/30 | 339 | 2,147 |
| Mapes Canyon | Cattle | 6/1 to 9/30 | 1,377 | 14,614 |
| Doyle | Cattle | 6/1 to 9/30 | 529 | 5,100 |
| Trosi Canyon | Cattle | $5 / 1$ to 9/30 | 532 | 6,937 |
| Bacher | Cattle | 6/15 to 6/30 | 296 | 4,109 |
| Dotta Neck | Cattle | 7/1 to 8/16 | 173 | 4,867 |
| Thompson Valley | Cattle | 6/1 to 8/30 | 158 | 1,607 |
| Spring Creek | Cattle | 6/1 to 8/25 | 844 | 11,709 |
| Arms | Cattle | $5 / 15$ to 6/15 | 90 | 778 |
| Mercer | Cattle | 6/1 to 9/30 | 582 | 8,115 |
| Crystal Peak | Cattle | 4/15 to 5/31 | 132 | 6,001 |
| Summit | Cattle | 5/16 to 9/30 | 990 | 19,563 |
| Beckwourth Peak | Sheep | 6/1 to 7/15 | 296 | 16,383 |
| Bulson | Cattle | 6/6 to 9/5 | 480 | 2,071 |
| Grizzly Valley Community | Cattle | 5/2 to 9/29 | 851 | 12,136 |
| Downing | Cattle | 6/1 to 9/15 | 209 | 1,343 |
| Meadow View | Cattle | 6/1 to 9/30 | 143 | 1,480 |
| Upper Trosi | Cattle | 6/15 to 9/15 | 165 | 16,426 |
| Chase | Cattle | 6/1-10/15 | 520 | 14,149 |
| Grizzly Valley | Cattle | 5/2 to 9/29 | 2,622 | 12,606 |
| Humbug | Cattle | 7/1 to 8/31 | 256 | 3,624 |
| Willow Creek (05-29) | Cattle | 6/16 to 10/15 | 201 | 6,861 |
| Clarks Creek | Cattle | 6/1 to 10/1 | 1,105 | 17,436 |
| Hosselkus | Cattle | 10/1 to 10/31 | 539 | 2,503 |
| Jenkins | Cattle | 6/14 to 10/13 | 3,270 | 34,049 |
| McClellan Canyon | Cattle | 6/16 to 10/15 | 201 | 15,765 |
| Red Rock | Cattle | 10/1 to 10/31 | 54 | 9,247 |
| Ridenour | Cattle | 6/16 to 10/15 | 805 | 23,273 |
| Mapes Canyon | Sheep | 5/15 to 7/15 | 407 | 14,614 |
| Dixie Valley | Sheep | 8/1 to 9/30 | 401 | 12,891 |
| Little Dixie | Sheep | 6/1 to 9/30 | 802 | 9,172 |
| Fitch Canyon | Cattle | 6/3 to 10/2 | 1,484 | 19,593 |
| Ferris Fields | Cattle | 6/1 to 9/30 | 795 | 2,714 |
| McKesick Peak | Cattle | 6/1 to 7/31 | 397 | 8,334 |


| Allotment | Livestock | Season of Use | AUMs | Allotment Acres |
| :---: | :---: | :---: | :---: | :---: |
| Beckwourth Ranger District |  |  |  |  |
| Snow Lake | Cattle | 7/1 to 9/15 | 107 | 3,740 |
| Ramelli Ranch | Cattle | $5 / 1$ to 10/30 | 1,191 | 3,279 |
| Mt Haskel | Sheep | 9/1 to 9/15 | 200 | 3,416 |
| Ramelli | Cattle | Vacant | Vacant | 8,248 |
| Hall | Cattle | Vacant | Vacant | 4,358 |
| Humphrey | Cattle | Vacant | Vacant | 1,673 |
| Otis Canyon | Cattle | Vacant | Vacant | 2,166 |
| Stiles | Cattle | Vacant | Vacant | 2,153 |
| Willow Creek (01-21) | Cattle | Vacant | Vacant | 13,270 |
| Bonta | Cattle | Vacant | Vacant | 1,120 |
| Bald Rock | Cattle | Vacant | Vacant | 2,150 |
| Burnham | Cattle | Vacant | Vacant | 1,293 |
| Horton Canyon East | Cattle | Vacant | Vacant | 3,059 |
| Horton canyon South | Cattle | Vacant | Vacant | 3,572 |
| Long Valley | Cattle | Vacant | Vacant | 19,218 |
| Lake Davis | Cattle | Vacant | Vacant | 3,096 |
| Mount Hough Ranger District |  |  |  |  |
| Lights Creek | Cattle | 6/1 to 9/1 | 161 | 29,930 |
| Antelope Lake | Cattle | 9/3 to 10/4 | 209 | 4,404 |
| Lone Rock | Cattle | $5 / 1$ to $11 / 30$ | 1,181 | 24,628 |
| Bucks Creek | Cattle | 6/1 to 10/15 | 1,863 | 41,068 |
| Bear Creek | Cattle | Vacant | Vacant | 39,870 |
| Taylor lake | Sheep | Vacant | Vacant | 26,922 |
| Hungry Creek | Sheep | Vacant | Vacant | 17,006 |
| Feather River Ranger District |  |  |  |  |
| Fall River | Cattle | 5/20 to 10/25 | 3,831 | 72,684 |
| Onion Valley | Cattle | Vacant | Vacant | 29,837 |
| Strawberry Valley | Cattle | Vacant | Vacant | 40,471 |
| Mt Filmore | Cattle | Vacant | Vacant | 45,981 |
| Flea Valley | Cattle | Vacant | Vacant | 19,625 |
| French Creek | Cattle | Vacant | Vacant | 38,644 |
| Mill Creek | Cattle | Vacant | Vacant | 12,796 |
| Gravel Range | Cattle | Vacant | Vacant | 7,040 |
| Little Grass Valley | Cattle | Vacant | Vacant | 19,625 |

## Present Actions

## Forestwide

## 1. Beckwourth Peak Recreation Project categorical exclusion

Description: Objectives are to provide access to Beckwourth Peak area and to provide alternative recreation activities to relieve congestion in heavily used areas. Propose construction of approximately 20 miles of nonmotorized trails around Beckwourth Peak.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=52465

## 2. Mammoth Base Area land exchange environmental impact statement

Description: Exchange of approximately 35.6 acres of National Forest System land, currently under special use authorization to Mammoth Mountain Ski Area, located near the Main Lodge north of Highway 203 for approximately 1296.7 acres of private land in California.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=30428

## 3. Moonlight Fire Invasive Plant Treatment Project environmental assessment

Description: Integrated pest management of up to 500 acres of invasive-plant-infested areas per year, using herbicides on up to 250 acres per year.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=46877
Beckwourth Ranger District

## 1. Dixie Valley Collaborative categorical exclusion

Description: The project is under agreement between the Plumas National Forest and the Plumas County Fire Safe Council. It aims at mechanically reducing hazardous fuels by mastication on 74 acres of private land.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=53012

## 2. Frenchman Lake Forest Health Project categorical exclusion

Description: Improve resistance to bark beetle attacks and promote resilience to drought and wildfire. Proposed treatments include: mechanical thinning, hand thinning and piling, mastication, pile burning, underburning, and decommissioning of nonsystem roads.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=52347

## 3. Haskell Ecosystem Health Project environmental assessment

Description: To improve forest health, reduce fuels and obliterate roads.

## 4. Lakes Basin Project environmental assessment

Description: Improve forest health and reduce hazards around recreation sites. Activities include mechanical thinning, grapple piling, mastication, hand thinning and underburning.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=40964

## 5. Mills Peak Trail south categorical exclusion

Description: Construct 0.95 mile of new nonmotorized trail and add 2.8 miles of existing user-created trails to the national forest trail system. The new trails would connect the existing Mills Peak Trail to the Round Lake Trailhead.

## 6. Plumas-Eureka Forest Health Project categorical exclusion

Description: Goals are to improve resistance to bark beetle attacks and promote resistance to drought and wildfire. Proposed activities include mechanical thinning, hand thinning, pile burning, underburning, and decommissioning of nonsystem roads.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=52402

## 7. Rush Skeleton Weed Project environmental assessment

Description: Rush skeleton weed would be sprayed with aminocyclopyrachlor chlorsulfuron (for example, Perspective) or aminopyralid triclopyr (Capstone or Milestone Plus) or a combination of these herbicides with a surfactant (for example, methylated seed oil) and dye.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=43804

## 8. Thompson Meadow Restoration Project environmental assessment

Description: To restore historic floodplain function and the historic meadow water table elevation along a 0.6 mile reach of Thompson Creek, a tributary to McReynolds Creek, which flows to Red Clover Creek. Additional Information: Web link: http://www.fs.usda.gov/project/?project=52760

## Feather River Ranger District

## 1. Bullards Bar Invasive Plant Treatments Project environmental assessment

Description: To eradicate or control six species of nonnative invasive plants: rush skeletonweed, yellow starthistle, Scotch broom, barbed goatgrass, Italian thistle, and medusahead using a combination of chemical (herbicide) and manual treatments.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=52835

## 2. Challenge community protection fuel reduction (CPFR) environmental assessment

Description: This wildland-urban interface project is designed to reduce the risks of wildfire around the communities of Challenge and Woodleaf, California; enhance firefighter safety; remove hazardous trees along roads; and improve forest resiliency.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=49695

## 3. Gibsonville Healthy Forest Restoration Project environmental assessment

Description: Using a variety of vegetation treatments including sale of merchantable timber and biomass to reduce risk of catastrophic wildfire, release aspen, restore meadows and other wetlands, and to restore and protect the historic Gibsonville townsite.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=47960

## 4. Hughes wetland development and maintenance categorical exclusion

Description: Propose to protect, maintain and enhance existing habitat conditions and provide additional breeding habitat for the California red-legged frog by constructing ponds, removing invasive species, and conducting other activities in designated critical habitat.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=51541

## 5. Bullards Bar fire restoration categorical exclusion

Description: We propose to restore resources damaged by the Bullards Fire through a combination of fuels reduction, Scotch broom control, tree planting, wetland habitat development, water storage, trail construction, and road sign replacement activities.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=51420

## 6. HDH Millet Nonsystem Road Decommissioning Project categorical exclusion

Description: Restore to more natural state by removing any culverts, constructing 20 water-bars, removing berm and hardening stream crossing, treating with weed free straw, revegetating, and blocking using boulders or large berm.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=52775

## 7. Pondo Fire Salvage Project categorical exclusion

Description: Salvage timber in areas of high vegetation burn severity, including slash and site preparation, reforestation and release treatments. Slash from logging operations will be spread to reduce erosion. Reforestation is proposed through cultural treatments.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=52832

## Mt. Hough Ranger District

## 1. Caribou 26N67 Salvage Project categorical exclusion

Description: Pacific Gas and Electric felled hazardous trees within the Caribou transmission line. Proposed actions include removing the felled trees within the transmission line as well as removing trees in an adjacent area that blew down from a weather event.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=53256

## 2. Elizabethtown II Hazardous Fuel Reduction Project categorical exclusion

Description: This project proposes to hand thin and underburn approximately 41 acres.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=53335

## 3. Four Corners OHV Play Area Rehab Project categorical exclusion

Description: Rehabilitate the Four Corners OHV play area

## 4. Franks Valley Forest Health Project categorical exclusion

Description: Improve forest health, wildlife habitat, and Baker Cypress habitat and reduce fire risk around seasonal residences in Frank's Valley.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=51526

## 5. Greenhorn Creek Guest Ranch outfitting and guiding permit reissue

Description: Reissue a 10-year permit for horseback rides and an assigned campsite on National Forest System land. This is the same operation as the past 10 years, with approximately 39 miles of trail and the majority of the rides with 8 miles of the ranch.

## 6. Moonlight Fire Area Restoration Project environmental assessment

Description: The project would restore the area burned in the 2007 Moonlight Fire by reducing the postfire effects to vegetation, watersheds, and recreation and enhancing resiliency to future fires, droughts, insect and disease infestations, and climate change.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=49421

## 7. Mud Lake Trail Realignment categorical exclusion

Description: Realign 800 feet of trail out of wet area that is possible habitat for threatened and endangered frog species.

## 8. Storrie and Rich Fire Area Watershed Improvement and Forest Road 26N67 Realignment Project environmental assessment

Description: Road realignment of National Forest System Road 26N67 and road decommissioning to reduce sedimentation of streams that resulted from changed hydrological conditions following the Storrie, Rich, and Chips Fires.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=51655

## 9. Clustered Lady's Slipper Orchid and Serpentine Rare Plant Community Conservation Project categorical exclusion

Description: Vegetation and fuels treatments to restore and maintain conditions for clustered lady's slipper orchids and for rare plant communities associated with serpentine-derived soils.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=51631

## 10. Feather River Aquatic Organism Passage Project environmental assessment

Description: The Forest Service, in partnership with California Department of Transportation, is proposing to replace 5 culverts along Highway 70 to improve passage for aquatic species (fish, amphibians, and reptiles) so they can access previously blocked tributaries.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=50615

## 11. Indian Creek Watershed Road Maintenance and Smith Creek Stream Restoration Project categorical exclusion

Description: The project includes road maintenance, nonsystem road obliteration, and stream channel restoration in areas affected by the Moonlight Fire and post-fire flooding. Additional Information: Web link: http://www.fs.usda.gov/project/?project=50687

## 12. Minerva 5 Fire Salvage Project categorical exclusion

Description: The primary goal for this project is economic recovery of the timber value lost and secondary benefits include roadside hazard tree removal and reforestation.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=52726

## 13. Moonlight Aquatic Organism Passage Project categorical exclusion

Description: This project proposes to replace five existing culverts with stream crossings that are aquatic organism passages in the Moonlight Fire area.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=50253

## 14. Moonlight Fire fuels reduction in owl and goshawk habitats categorical exclusion

Description: Restore wildlife habitat by reducing fuels, reintroducing fire, enhance Weber's milk vetch, and remove nonsystem roads that cause disturbance to wildlife.
Additional Information: Web link: http://www.fs.usda.gov/project/?project=51753

## Reasonably Foreseeable Future Actions ${ }^{1}$

## Forestwide

## 1. Lassen National Forest over-snow vehicle (OSV) use designation environmental impact statement

Description: The Forest Service is evaluating its existing management of OSV use on the Lassen National Forest. The goal of this proposed project is to designate Lassen National Forest system roads, trails, and areas where OSV use will be allowed, restricted or prohibited.
Additional Information: Web link: http://www.fs.usda.gov/detail/r5/recreation/travelmanagement
2. Tahoe National Forest over-snow vehicle (OSV) use designation environmental impact statement
Description: Designating over-snow vehicle (OSV) use on National Forest System roads, trails, and areas on National Forest System lands within the Tahoe National Forest where snowfall depth is adequate for that use to occur and identifying snow trails available for grooming.
Additional Information: Web link: http://www.fs.usda.gov/detail/r5/recreation/travelmanagement

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## Appendix H. Scoping Comments Categories

This appendix provides information regarding scoping comments received in November 2015. Table H-1 displays percentages of subjects identified from scoping comments received after the publication of the Notice of Intent in the Federal Register. A content analysis process was applied to the scoping comments, themes or categories were created, and Table H-2 displays the most common themes from scoping comments received.

Table H-1. Percentage of scoping comment subjects received after publication of the Notice of Intent (2015)

| Subject | Approximate Percentage of Comments |
| :--- | :---: |
| Socio Economic Impacts | 19 |
| Noise and Solitude | 11 |
| OSV Use- Against Closures Lakes Basin Area | 10 |
| Wildlife - Bald Eagle | 9 |
| Site Specific Non-Motorized Opportunities | 8 |
| OSV Use - Against Additional Closures | 8 |
| Recreation - Multiple Use | 7 |
| More Non-Motorized Opportunities | 7 |
| PCT - Against Restricting OSV Crossing | 7 |
| OSV Use - Increase Closures | $\mathbf{7}$ |
| OSV Use - No Changes/Action | $\mathbf{7}$ |
| Total | $\mathbf{1 0 0 \%}$ |

Table H- 2. Most common themes identified from scoping comments received in 2015

| Most Common Themes from Scoping Comments | Number of Comments in <br> Which Theme Appeared |
| :--- | :---: |
| Over Snow Vehicle Use | 103 |
| New Alternative | 90 |
| OSV - Prohibited Use | 85 |
| Pacific Crest Trail - Crossing | 74 |
| Wildlife | 62 |
| Socio/Economic General | 57 |
| EIS - General Comments | 49 |
| Snow Depth | 41 |
| Non-Motorized Recreation | 38 |
| User Conflicts (OSV versus Non-Motorized) | 33 |

## Appendix I. Response to Comments

A letter notifying the public that the DEIS was available for review and comment for 45 days was sent via regular mail or email to interested groups, individuals, tribes, and agencies. The Notice of Availability notifying the public that the DEIS was available for review and comment for 45 days was published in the Federal Register on October 26, 2018 (83 FR 208, page 54105). On October 24, 2018, we also published a notice of the opportunity to comment in the Feather River Bulletin (newspaper of record) and sent a press release to local news media outlets.

On Friday, December 7, 2018, we published an amended notice in the Federal Register (83 FR 235, page 63162 ) extending the comment period from December 10, 2018, to January 24, 2019, to accommodate requests for an extension due to the nearby Camp Fire; which impacted the ability of some potentially interested stakeholders to submit comments by December 10, 2018. On December 3, 2019, we also sent a press release to local news media outlets confirming the comment period extension. On Friday, February 8, 2019, we published a second amended notice in the Federal Register (84 FR 27, page 2860) extending the comment period from January 24, 2019, to March 1, 2019, as a result of the government shutdown. On February 8 and 11, 2019, we also sent a press release to local news media outlets.

We received 211 public comment letters for the DEIS. Of those, 168 were unique letters, 11 were duplicate submissions, and 34 were form or form plus letters.

Table I-1 shows the initial comment period submitters, by letter number, commenter name, organization and letter type.

Table I-1. DEIS comment period letters from October 10, 2018 through January 25, 2019

| Correspondence <br> Number | Commenter Name | Organization | Letter Type |
| :---: | :--- | :--- | :--- |
| A-1 | Jeffrey Vines |  | Unique |
| A-2 | Jason Klemesrud |  | Unique |
| A-3 | Nicholas Beddoe |  | Unique |
| A-4 | Mike Visinoni | Unique |  |
| A-5 | Jacob Nelson | Unique |  |
| A-6 | Ryan Schopen |  | Unique |
| A-7 | Lucinda Berdon |  | Unique |
| A-8 | Dan Fruchtenicht |  | Master Form |
| A-9 | Linda Margaretic |  | Unique |
| A-10 | Alan Morrison | Unique |  |
| A-11 | Gordon Keller |  | Unique Post |
| A-12 | Theresa O'Shea |  | Unique |
| A-13 | Sandy McKee |  | Unique |
| A-14 | Peggy Gustafson |  | Master Form |
| A-15 | Larry Gustafson |  | Marm |
| A-16 | Howard Whitaker |  | Form Plus |
| A-17 | Susan Stirling |  | Unique |
| A-18 | Graham Shea |  | Unique |
| A-19 | Robert Lensch |  | Unique |
| A-20 | Kristi DeMoisy |  | Unique |
| A-21 | Joshua Maul |  |  |
| A-22 | lan Schrammel |  |  |


| Correspondence Number | Commenter Name | Organization | Letter Type |
| :---: | :---: | :---: | :---: |
| A-23 | Kevin Hopper |  | Unique |
| A-24 | Adam Lochmann |  | Unique |
| A-25 | Teresa Arrate |  | Form |
| A-26 | Ellen Gierson |  | Unique |
| A-27 | David Marancik |  | Form |
| A-28 | Howard Whitaker |  | Duplicate |
| A-29 | Jason Bates |  | Form |
| A-30 | Christine Emerson |  | Unique |
| A-31 | Marvin Schenck |  | Unique |
| A-32 | Cliff Wheeler |  | Unique |
| A-33 | John Taylor |  | Unique |
| A-34 | Suzanne McDonald |  | Unique |
| A-35 | Terry Cross |  | Unique |
| A-36 | James Munson | U.S. Environmental Protection Agency | Unique |
| A-37 | Patricia A. Wormington |  | Unique |
| A-38 | Myles Vickers |  | Unique |
| A-39 | Jim Samp |  | Unique |
| A-40 | Greg Gruner |  | Unique |
| A-41 | Don Zuliani |  | Unique |
| A-42 | Todd Welty |  | Unique |
| A-43 | Randy Bennett |  | Unique |
| A-44 | Rob Russell |  | Unique |
| A-45 | Tony Curatolo |  | Unique |
| A-46 | John Perhacs |  | Unique |
| A-47 | Bryan Davey |  | Unique |
| A-48 | Douglas Meyers |  | Unique |
| A-49 | Lucy O'Brien |  | Unique |
| A-50 | Janet Hoffmann |  | Unique |
| A-51 | Howard J Whitaker |  | Form Plus |
| A-52 | Gary Millar |  | Form Plus |
| A-53 | Tanya Dragan |  | Unique |
| A-54 | Judy Schaber |  | Unique |
| A-55 | Bruce Livingston |  | Unique |
| A-56 | Dale Lambert |  | Unique |
| A-57 | James Mc Pherson |  | Form |
| A-58 | Gina Ryan |  | Unique |
| A-59 | Jesse ORourke |  | Unique |
| A-60 | Shannon Hoyt |  | Form Plus |
| A-61 | Eric Heidman |  | Master Form |
| A-62 | Andrew Knutsen |  | Unique |
| A-63 | Connor Swift | Pacific Crest Trail Association | Unique |
| A-64 | Howard Whitaker |  | Form |
| A-65 | Diane Gleason |  | Form Plus |
| A-66 | Tom Suk |  | Form Plus |
| A-67 | Lars Jensen |  | Form |
| A-68 | Judy Harlow |  | Unique |


| Correspondence Number | Commenter Name | Organization | Letter Type |
| :---: | :---: | :---: | :---: |
| A-69 | Ryan Beatie |  | Master Form |
| A-70 | Ann Barbarick |  | Unique |
| A-71 | Anne Sparks |  | Form Plus |
| A-72 | Hilary Eisen | Winter Wildlands Alliance | Unique |
| A-72 | Jim Gibson | Snowlands Network | Unique |
| A-73 | Barbara Inyan |  | Form Plus |
| A-74 | Michael Stewart |  | Unique |
| A-75 | Darrel Jury | Friends of Plumas Wilderness | Unique |
| A-76 | Richard O'Rourke | High Mountain rangers | Unique |
| A-77 | Daniel Klauer |  | Unique |
| A-78 | Scott Jones | CNSA; ORBA | Unique |
| A-79 | Kevin Bazar | Sierra Snowmobile Foundation | Unique |
| A-80 | John Fisher |  | Unique |
| A-81 | Marcus Libkind |  | Form Plus |
| A-82 | Greg Parnow |  | Unique |
| A-83 | Jimmy Hogg |  | Unique |
| A-84 | Jeff Neves |  | Unique |
| A-85 | Caeli Slagle |  | Form Plus |
| A-86 | Judi Brawer | WildEarth Guardians | Unique |
| A-86 | Susan Britting | Sierra Forest Legacy | Unique |
| A-86 | Steve Evans | California Wilderness Coalition | Unique |
| A-86 | Pamela Flick | Defenders Of Wildlife | Unique |
| A-86 | Alison Flint | The Wilderness Society | Unique |
| A-86 | Darrel Jury | Friends of Plumas Wilderness | Unique |
| A-86 | Patricia Puterbaugh | Lassen Forest Preservation Group | Unique |
| A-86 | Barbara Rivens | Sierra Club, Mother Lode Chapter | Unique |
| A-87 | Barbara Price |  | Unique |
| A-88 | Barbara Price |  | Unique |
| A-89 | Barbara Price |  | Unique |
| A-90 | Brittany Konsella | Share the Slate | Unique |
| A-91 | Robert Latta |  | Unique |
| A-92 | Mary Krupka |  | Unique |
| A-93 | Joel Neves |  | Unique |
| A-94 | Jeff Pearson |  | Unique |
| A-95 | James Lister | International Snowmobile Manufacturers' Association and American Council of Snowmobile Associations | Unique |
| A-95 | Paul Turcke | BlueRibbonCoalition, Inc. | Unique |
| A-96 | Jerad Slagle |  | Unique |
| A-97 | Luke Mathews |  | Unique |
| A-98 | Steve Scott |  | Form |
| A-99 | Michael Wolfe |  | Unique |


| Correspondence Number | Commenter Name | Organization | Letter Type |
| :---: | :---: | :---: | :---: |
| A-100 | Todd Johns | Plumas County Sheriff's Office | Unique |
| A-101 | Randall Cleveland | Protecting Earth \& Environment with Complassion \& Education-PEACE | Unique |
| A-102 | Rob Behrenz |  | Unique |
| A-103 | Michael Murphy |  | Unique |
| A-104 | Rebecca Guereque |  | Unique |
| A-105 | Rebecca Guereque |  | Unique |
| A-106 | Rebecca Guereque |  | Duplicate |
| A-107 | Rebecca Guereque |  | Duplicate |
| A-108 | Mary Krupka | Sonora Pass Snowmobile Club |  |
| A-109 | Ronald Ondracek |  | Unique |
| A-110 | Paul Turcke | BlueRibbon Coalition | Unique |
| A-111 | DeWitt Henderdon |  | Unique |
| A-112 | Andrew Horn |  | Unique |
| A-113 | Kevin Bradford |  | Unique |
| A-114 | Duff DuPont |  | Unique |
| A-115 | Douglas Meyers |  | Unique |
| A-116 | Douglas Meyers |  | Unique |
| A-117 | Douglas Meyers |  | Unique |
| A-118 | Douglas Meyers |  | Unique |
| A-119 | Spencer Martinez |  | Unique |
| A-120 | Jeff Erdoes |  | Unique |
| A-121 | Kelly Lauer |  | Unique |
| A-122 | Terri Rust |  | Unique |
| A-123 | Joe Gill |  | Unique |
| A-124 | Brian Nigon |  | Unique |
| A-125 | Annabelle Mathews |  | Unique |
| A-126 | Alanna Misico |  | Unique |
| A-127 | Brinley Shaw |  | Unique |
| A-128 | Scott Spero |  | Unique |
| A-129 | Travis Cockcroft |  | Unique |
| A-130 | Levi Pence |  | Unique |
| A-131 | Ian Esten |  | Unique |
| A-132 | Joe Popsen |  | Unique |
| A-133 | Dewey Hutchison |  | Unique |
| A-134 | Zach Adkins |  | Unique |
| A-135 | Ben Birk |  | Unique |
| A-136 | Tyler Copeland |  | Unique |
| A-137 | Jon Miller |  | Unique |
| A-138 | Peter Tankersley |  | Unique |
| A-139 | Harvey West | Graeagle Land and Water Company | Unique |
| A-140 | Harvey West | Graeagle Land and Water Company | Duplicate |


| Correspondence Number | Commenter Name | Organization | Letter Type |
| :---: | :---: | :---: | :---: |
| A-141 | Sylvia Milligan | Recreation Outdoors Coalition | Unique |
| A-142 | Stephen Fly |  | Unique |
| A-143 | Alex Dorszynski | Tahoe Massive | Unique |
| A-144 | Darrel Jury | Friends of Plumas Wilderness | Unique |
| A-145 | Amy Granat | California Off-Road Vehicle Association | Unique |
| A-146 | Suzanne Schramel |  | Unique |
| A-147 | Dayne Lewis |  | Unique |
| A-148 | Scott Stirling |  | Unique |
| A-149 | Trinity Stirling |  | Unique |
| A-150 | Andrew Murphy |  | Unique |
| A-151 | Karin Bentley |  | Master Form |
| A-152 | Phil R. Gallagher |  | Form |
| A-153 | Harold A. Hallstein IV |  | Unique |
| A-154 | Marcia A. Giller |  | Unique |
| A-155 | David Schneider |  | Form |
| A-156 | Anon Anon | Greagle FPD |  |
| A-157 | Anon Anon | Greagle FPD | Duplicate |
| A-158 | Gaylan Hellyer |  | Unique |
| A-159 | Todd Johns | Plumas County, Office of the Sheriff | Duplicate |
| A-160 | Michelle Mathews |  | Unique |
| A-161 | Corky Lazzarino | Sierra Access Coalition | Unique |
| A-162 | Scott Jones | ORBA/CSNA | Unique |
| A-162 | Keith Sweepe | CNSA President | Unique |
| A-162 | Fred Wiley | ORBA | Unique |
| A-163 | Kyle Felker |  | Unique |
| A-164 | Dan Smith |  | Unique |
| A-165 | Bob Perrault | Plumas County and PCC | Unique |
| A-166 | Connor Swift | Pacific Crest Trail Association | Duplicate |

Table I- 2. DEIS comment period letters from January 1, 2019 through February 8, 2019

| Correspondence <br> Number | Commenter Name | Organization | Letter Type |
| :---: | :--- | :--- | :--- |
| B-1 | Dolly B. Chapman |  | Unique |
| B-2 | Mike Price |  | Unique |
| B-3 | Jeffrey Bryan |  | Unique |
| B-5 | Jeanne Burroughs | Unique |  |
| B-5 | Steve Burroughs | Wildearth Guardians | Unique |
| B-6 | Judy Brawer | Sierra Forest Legacy | Unique |
| B-6 | Sue Britting | California Wilderness Coalition | Unique |
| B-6 | Steve Evans |  |  |


| Correspondence <br> Number | Commenter Name | Organization | Letter Type |
| :---: | :--- | :--- | :--- | :--- |
| B-6 | Pamela Flick | Defenders of Wildlife | Unique |
| B-6 | Allison Flint | The Wilderness Society | Unique |
| B-6 | Darrell Jury | Friends of Plumas Wilderness | Unique |
| B-6 | Patricia Puterbaugh | Lassen Forest Preservation Group | Unique |
| B-6 | Barbara Rivenes | Mother Lode Chapter/Sierra Club | Unique |
| B-7 | Jeanne Burroughs |  | Unique |
| B-7 | Steve Burroughs |  | Unique |
| B-8 | Corky Lazzarino | Sierra Access Coalition | Unique |
| B-9 | Kyle Felker |  | Unique |

Table I- 3. DEIS comment period letters from February 9, 2019 through March 2, 2019

| Correspondence Number | Commenter Name | Organization | Letter Type |
| :---: | :---: | :---: | :---: |
| C-1 | Howard Whitaker |  | Form Plus |
| C-2 | Michael Bergamini |  | Unique |
| C-3 | Loren Rupp | Camp Fire Alaska | Unique |
| C-4 | Karen Kleven |  | Form |
| C-5 | Nick Repanich |  | Unique |
| C-6 | Howard Whitaker |  | Duplicate |
| C-7 | Susan Lisagor |  | Form |
| C-8 | Bruce Livingston |  | Duplicate |
| C-9 | Maryann Dresner |  | Master Form |
| C-10 | John Peroni |  | Unique |
| C-11 | Harvey West |  | Unique |
| C-12 | Lewis Persons | Persons Consulting | Unique |
| C-13 | Russ Alger | Michigan Technological University, Keweenaw Research Center | Unique |
| C-14 | Marilyn Dutton |  | Unique |
| C-15 | Julie Osburn | Friends of Independence Lake, Inc. | Unique |
| C-16 | Steve Lambert | Butte County Board Of Supervisors | Unique |
| C-16 | Peggy Moak | Butte County Board of Supervisors | Unique |
| C-17 | James Lister | International Snowmobile Manufacturers' Association \& American Council of Snowmobile Associations | Unique |
| C-18 | Robert Perreault | Plumas County | Unique |
| C-19 | Daryl Bender | Hillsliders Snowmobile Club | Unique |
| C-20 | Corky Lazzarino | Sierra Access Coalition | Unique |
| C-21 | John Fisher |  | Unique |
| C-22 | Dustin Doyle | Bucks Creek Homeowners Association | Master Form |
| C-22 | Dubrin Sayers | Norton Meadows Homeowners Association | Master Form |


| Correspondence Number | Commenter Name | Organization | Letter Type |
| :---: | :---: | :---: | :---: |
| C-22 | Eric Ward | Bucks Lake HOA | Master Form |
| C-23 | Kathy Felker |  | Unique |
| C-24 | Dustin Doyle | Bucks Creek Homeowners Association | Master Form |
| C-24 | Durbin Sayers | Norton Meadows HOA | Master Form |
| C-24 | Eric Ward | Bucks Lake Homeowners Association | Master Form |
| C-25 | Jared McVey |  | Unique |
| C-26 | Dustin Doyle | Bucks Creek HOA | Form |
| C-26 | Durbin Sayers | Norton Meadows Homeowners Association | Form |
| C-26 | Eric Ward | Bucks Lake Homeowners Association | Form |
| C-27 | Corky Lazzarino | Sierra Access Coalition | Unique |
| C-28 | Rob Russell |  | Unique |
| C-29 | Patricia DeCoe |  | Unique |
| C-30 | Phil Gallagher |  | Unique |
| C-31 | Doug Teeter | Butte County | Unique |
| C-32 | Mike Price |  | Unique |
| C-33 | Clyen Landry |  | Unique |
| C-34 | Darrel Jury |  | Unique |
| C-35 | Cathy Karr |  | Unique |
| C-36 | Bruce Livingston |  | Unique |
| C-37 | Joel Harris | La Porte Snowmobile Club Executive Board | Unique |
| C-37 | Clint Johnson | La Porte Snowmobile Club Executive Board | Unique |
| C-37 | Kristi Johnson | La Porte Snowmobile Club Executive Board | Unique |
| C-37 | Jerad Slagle | La Porte Snowmobile Club Executive Board | Unique |
| C-38 | Clint Johnson |  | Unique |
| C-39 | Steve Lambert | Butte County Board of Supervisors | Duplicate |
| C-39 | Peggy Moak | Butte County Board of Supervisors | Duplicate |
| C-40 | Kyle Felker |  | Unique |

Table I- 4. Comment categories, number of comments, and correspondence numbers

| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| General Comments | 3 | A143-4, A151-1, A154-8 |
| General Comments (Motorized Viewpoint) | 22 | A2-1. A6-1, A55-14, A68-1, A72-56, A76-5, A77-2, A80-22, A95-23, A100-19, A103-1, A103-5, A104-2, A105-2, A109-10, A129-4, A130-19, C19-2. C20-12, C29-4 |
| General Comments (Non-Motorized Viewpoint) | 15 | $\begin{aligned} & \text { A9-1, A11-1, A13-1, A26-1, A34-1, A37-5, A37-12, A44-3, A44-5, A44-7, A44-12, } \\ & \text { A50-2, A72-17, A86-7, A120-5 } \end{aligned}$ |
| Alternative 1 Support | 20 | A1-1, A5-1, A18-2, A33-1, A58-16- A61-2, A91-2, A92-10, A94-5, A100-21, A1083, 109-34, A118-1, A125-1, A126-1, A1=27-4, A128-9, A137-7 |
| Alternative 2 Support | 31 | A7-1, A10-1, A12-1, A17-1, A19-1, A35-1, A40-2, A44-2, A44-13, A44-17, A49-1, A50-1, A51-1, A53-2, A54-1, A60-2, A63-2, A63-9, A63-10, A63-11, A63-15, A653, A72-2, A73-1, A86-50, A86-54, A120-1, A120-2, A120-7, A122-2, A141-1 |
| Alternative 2 - Modified | 5 | A-16-1, A49-2, A51-2, A81-1, A144-2 |
| Alternative 2 Modifications Recommended | 11 | $\begin{aligned} & \text { A-72-3, A72-5, A86-3, A95-20, A110-1, A110-4, A110-19, A120-8, A153-3, C9-1, } \\ & \text { C12-4 } \end{aligned}$ |
| Alternative 3 Support | 2 | A86-35, A86-36 |
| Alternative 4 Support | 9 | A23-1, A42-2, A45-1, A93-1, A95-4, A162-13, A162-55, C11-3, C25-15 |
| Alternative 4 - Opposition | 1 | A63-13 |
| Alternative 5 Support | 4 | A53-3, A75-19, A86-37, A122-3 |
| Alternatives 1 and 4 Support | 13 | $\begin{aligned} & \text { A62-1, A69-1, A74-1, A74-4, A76-2, A82-1, A97-1, A97-4, A98-1, A160-2, B3-8, } \\ & \text { C3-8 } \end{aligned}$ |
| Alternatives 2 and 5 Combined | 3 | A75-7, A75-11, A75-21 |
| Alternatives 2, 3, and 5 Non-Support | 7 | A74-2, A76-1, A82-2, A90-2, A93-2, A160-3, C25-16 |
| Alternatives 3 and 5 Modifications | 4 | A86-51, A144-3, C35-3, C35-4 |
| Alternative 6 from 2015 Proposal | 3 | A47-1, A162-15, A162-57 |
| Alternatives - Non-Motorized Support | 1 | A22-1 |
| OSV Use Designation - General Support | 6 | A30-1, A72-8, A86-26, A101-2, A101-10, C20-15 |
| OSV Use Designation - Non-Support | 11 | A47-2, A48-1, A58-15, A61-3, A80-6, A92-11, A128-6, A129-1, A133-3, A136-1, B3-1 |
| OSV Use - Oppose any Closure | 7 | A2-3, A3-1, A4-1, A31-1, A85-3, A90-3, A96-3 |
| OSV Use Restrictions / Economics | 2 | A77-5, A162-54 |


| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| Economic Impacts - OSV Use | 50 | A2-2, A3-2, A4-3, A5-5, A41-1, A61-7, A76-7, A90-11, A92-6, A92-17, A95-9, A961, A100-17, A100-22, A104-3, A104,7, A108-1, A109-28, A109-29, A109-32, A10935, A111-1, A111-2, A111-4, A111-5, A111-10, A112-2, A112-6, A114-1, A114-4, A119-2, A123-12, A124-2, A127-3, A128-3, A130-4, A130-9, A133-2, A134-4, A138-2, A139-1, A161-13, B3-2, C4-4, C16-12, C16-14, C22-1, C31-15 |
| Economics - DEIS Failures | 10 | A47-4, A72-57, A79-9, A130-5, A130-7, A130-10, A145-8, C18-10, C22-3, C31-14 |
| OSV Use - Considerations | 4 | A47-5, A80-10, A109-11, A110-9 |
| Public Land Access |  | A20-1, A21-1, A24-1, A42-1, A42-3, A46-1, A60-1, A60-3, A61-1, A70-1, A76-4, A82-3, A90-1, A90-9, A90-10, A91-1, A96-15, A99-2, A109-31, A120-19, A121-4, A123-1, A128-2, A133-1, A133-4, A136-6, A137-2, A137-4, A137-5, A138-3, A14110, A143-7, A156-9, A156-10, A158-9, A160-6, C14-1, C15-2, C31-9, C31-16, C20-9, C20-10, C20-11, C22-2, C22-17 |
| Groomed Trails | 1 | A61-5 |
| OSV Restrict Use - General | 9 | A66-2, A101-5, A101-6, C12-2, C28-2, C28-4, C28-8, C28-11, C35-2 |
| OSV Restrict Use - All Areas | 1 | A53-1 |
| OSV Restrict Use - East Side of the Plumas | 1 | A44-24 |
| OSV Restrict Use - Brady's Camp Sensitive Plant Area | 1 | A44-23 |
| OSV Restricted Use - Bucks Lake Area | 1 | A44-20 |
| OSV Restrict Use - Grizzly Ridge | 1 | A44-22 |
| OSV Restrict Use - Lost Sierra Ski Traverse | 4 | A44-8, A44-9, A44-10, A44-16 |
| OSV Restrict Use - Low Elevation | 4 | A-40-4, A86-67, A148-1, A149-1 |
| OSV Restrict Use - Middle Fork Feather River | 6 | A40-3, A44,18, A146-1, A148-2, A149-2, A150-1 |
| OSV Use - Goose and Haven Lakes | 1 | A79-26 |
| OSV Use - Roads / County Routes | 3 | A55-20, A80-8, A100-11 |
| Hybrid Alternative - Bucks Lake Area | 1 | A75-3 |
| Hybrid Alternative - Lakes Basin | 3 | A72-24, A75-17, A86-57 |
| Hybrid Alternative - Lake Davis Area | 1 | A75-15 |
| Hybrid Alternative - Canyon Area | 1 | A75-14 |
| Use of Areas - Antelope (Non-Motorized) | 4 | A72-18, A75-9, A75-12, A86-52 |
| Frenchman Area - Friends of Plumas Wilderness | 1 | A75-16 |
| La Porte Area | 4 | A75-18, A84-1, A97-2, A113-8 |


| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| DEIS-General Comments Friends of Plumas Wilderness | 1 | A75-1 |
| Use of Areas - Bucks Lake | 43 | A44-11, A44-21, A55-17, A58-11, A61-4, A69-5, A72-20, A77-14, A79-25, A83-2, A86-53, A90-17, A92-8, A92-9, A92-13, A92-14, A96-6, A100-5, A104-6, A110-15, A111-8, A113-9, A123-11, A128-1, A129-5, C15-11, C16-10, C22-8, C22-9, C2212, C28-6, C28-7, C28-10, C31-12, C28-5 |
| Use of Areas - McRae Meadows | 20 | A58-9, A59-8, A69-7, A76-3, A77-10, A83-3, A96-9, A110-13, A112-5, A113-7, A123-9, A131-8, A145-17, A156-6, A158-8, B5-8, C15-9, C25-10, C28-14, C38-7 |
| Specific Areas and Trails - Lake Davis | 15 | A8-1, A54-3, A72-22, A80-17, A86-55, A100-3, A110-11, A113-10, A130-6, A13024, A141-7, A161-5, C2-3, C15-7, C25-8 |
| Specific Areas and Trails - Lakes Basin | 23 | A44-14, A44-15, A55-6, A55-16, A58-7, A80-12, A100-2, A126-4, A130-21, A1322, A135-1, A138-1, A141-5, A161-3, C2-2, C3-1, C10-2, C16-9, C16-11, C22-5, C28-12, C31-11, C31-13 |
| Specific Areas and Trails - La Porte Area | 1 | A160-4 |
| Specific Areas and Trails - Thompson Peak | 7 | A58-12, A110-16, A131-11, A145-20, C14-3, C15-12, C25-13 |
| Challenge Experimental Forest | 1 | A162-36 |
| Routes on Private Property | 3 | A88-1, B2-5, C27-3 |
| User Conflicts - General (OSV vs. Non-Motorized) | 10 | A37-1, A40-1, A44-4, A54-2, A60-5, A65-2, A72-1, A72-16, A73-2, A86-48 |
| User Conflict - General (OSV Viewpoint) | 11 | $\begin{aligned} & \text { A55-18, A80-21, A90-4, A90-5, A96-13, A108-8, A109-18, A109-20, A121-3, A130- } \\ & \text { 15, A130-16 } \end{aligned}$ |
| User Conflicts (OSV vs. Non-Motorized) - Specific | 1 | A72-30 |
| User Conflicts - None Noted | 41 | A56-1, A58-4, A59-6, A61-11, A69-11, A70-5, A77-3, A79-29, A92-7, A94-1, A962, A100-16, A100-18, A102-4, A104-1, A109-22, A110-20, A117-1, A123-4, A13018, A131-2, A135-4, A136-2, A141-2, A143-6, A145-11, A154-3, A154-4, A156-2, A158-1, A161-11, A162-38, A162-39, B3-6, C14-2, C15-6, C22-15, C25-4, C25-5, C29-7, C38-11 |
| Adequate Snow Depth - Definition | 80 | A43-2, A47-3, A47-6, A48-2, A48-4, A48-5, A55-1, A55-4, A58-2, A58-3, A61-8, A61-9, A69-9, A69-10, A77-11, A77-13, A79-10, A79-11, A79-12, A83-1, A90-12, A92-1, A92-4, A92-5, A95-5, A95-6, A95-7, A95-8, A95-11, A95-12, A95-19, A9522, A95-33, A95-34, A96-4, A96-11, A96-12, A97-3, A100-13, A102-3, A103-2, A104-5, A109-7, A110-7, A111-7, A113-2, A114-3, A116-2, A121-2, A123-2, A1272, A129-3, A130-1, A130-26, A131-4, A131-5, A135-3, A139-3, A143-2, A143-3, A145-10, A154-1, A156-1, A158-2, A158-3, A161-16, A161-18, A162-31, A162-50, B3-3, B3-5, C15-4, C15-5, C17-2, C19-1, C25-1, C25-3, C27-2, C38-9, C38-10 |


| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| Adequate Snow Depth - Lack Best Available Science | 16 | ```A95-17, A109-8, A109-13, A109-14, A110-5, A110-8, A141-3, A145-9, A161-8, A132-22, C13-3, C17-3, C18-8, C31-2, C31-17``` |
| Adequate Snow Depth - Inadequate Analysis | 1 | A130-3 |
| Adequate Snowfall - Elevation Criterion | 1 | A36-4 |
| Adequate Snowfall - Support | 4 | A72-35, A72-54, A75-4, A86-27 |
| Adequate Snowfall - Administration and Enforcement | 9 | A55-2, A59-4, A77-6, A85-4, A90-13, A100-15, A103-3, A108-5, A116-1 |
| Snow Depth - Administration and Enforcement | 13 | A55-22, A59-2, A70-4, A72-36, A80-2, A95-32, A109-15, A109-17, A111-6, A12015, A120-16, B2-7, B5-2 |
| Minimum Snow Depth - Support | 14 | A72-32, A72-37, A72-39, A72-55, A86-4, A86-28, A97-5, A120-3, A120-10, A12011, A120-14, A120-17, A138-6, C16-2 |
| Snow Depth - 6-inch Min Trail (Support) | 1 | A162-23 |
| OSV Concentration - Safety | 11 | $\begin{aligned} & \text { A77-4, A80-1, A80-15, A90-7, A90-8, A94-3, A109-21, A126-2, A128-7, A137-6, } \\ & \text { A142-1 } \end{aligned}$ |
| Emergency Management | 2 | A112-3, A154-7 |
| Elevation - 5,000 ft. unreasonable | 1 | A55-3 |
| PCTA - Support Multiple Use | 1 | A63-1 |
| PCT - Continue Current Management | 1 | A63-7 |
| PCT - Protection and Management | 5 | A60-6, A70-2, A73-3, A120-4, B1-5 |
| PCT - Non OSV Corridor | 1 | A63-6 |
| PCT - No OSV Effects due to Snow | 7 | A5-2, A56-2, A69-6, A77-7, A83-4, A134-2, C5-3 |
| PCT - Management Plan Winter Use | 15 | A43-1, A58-1, A59-5, A61-13, A79-13, A80-3, A80-4, A90-14, A115-1, A139-2, A154-2, A158-4, A161-7, A162-33, C15-3 |
| PCT - Crossings - General Comment | 1 | A63-4 |
| PCT - Crossings (Support) | 11 | A63-3, A63-12, A63-14, A72-26, A72-28, A72-29, A86-59, C-25-2, C28-9, C31-8 |
| PCT - Crossing as currently defined by the DEIS | 1 | A63-5 |
| PCT Trail Crossing (Non-Support) | 18 | A92-18, A94-2, A108-7, A109-24, A113-1, A123-3, A126-3, A128-8, A135-2, A1431, A145-13, A156-3, C5-1, C5-2, C10-3, C11-5, C18-7, C23-3 |
| PCT Buffer (Non-Support) and Access Concerns | 23 | A55-5, A63-8, A72-27, A79-14, A80-13, A80-14, A96-7, A102-2, A110-6, A129-2, A130-22, A141-8, A145-12, A162-17, A162-32, A162-58, B3-4, C20-18, C22-10, C22-18, C23-2, C29-5, C38-6 |
| PCT - La Porte Access | 2 | A69-3, A85-2 |

[^1]| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| PCT - Information / Signage | 3 | A162-34, A162-35, C16-7 |
| PCT - Setting Precedent | 1 | A162-18 |
| Enforcement - Ability to Enforce | 9 | A5-4, A44-25, A55-19, A100-20, C20-2, C20-16, C20-17, C28-5, C31-3 |
| Information / Signage (General) | 1 | A162-51 |
| Enforcement - Signage | 2 | A80-18, A80-20 |
| OSV Use - Wild and Scenic River Eligible | 2 | A79-23, A86-33 |
| Access - Handicapped / Disabled | 5 | A32-1, A128-5, A142-2, A142-3, A160-1 |
| Green Sticker - Grooming | 5 | A4-2, A24-2, A92-16, A130-14, A160-5 |
| Groomed Trails - Forest Service Guidance | 6 | A92-2, A92-3, C22-11 |
| OSV Trails (Non-motorized viewpoint) | 4 | A86-29, A86-40, A86-72, A109-6 |
| OSV Use - On Trail Only (Non-support) | 1 | A61-6 |
| Trailheads and Parking Lots | 3 | A80-16, A92-12, A92-15 |
| Trail Grooming Standards | 2 | A95-21, A95-24 |
| Trail Designations - On the Ground | 1 | A86-5 |
| Grooming - Road 24N33 Specific | 1 | A120-18 |
| OSV User Map | 1 | A95-18 |
| Access - Loss of OSV Access | 15 | A72-14, A76-6, A77-9, A100-1, A103-6, A109-2, A119-1, A121-1, A124-1, A124-3, A127-1, A131-1, A136-3, A138-7, C20-8 |
| Boundary Management | 5 | A55-21, C19-3, C20-19, C20-21, C34-1 |
| DEIS Sufficiency - Use of Inaccurate Data | 2 | A59-2, A79-8 |
| Purpose and Need - Does not Balance Use | 3 | A75-2, A75-6, A145-23 |
| DEIS minimization criteria application | 13 | A72-42, A72-43, A72-44, A72-46, A72-48, A72-50, A72-51, A72-52, A86-6, A8639, A86-41, A86-42, A86-43 |
| DEIS Sufficiency - Potential Failures | 1 | A145-24 |
| DEIS Format Deficiency | 1 | A109-30 |
| Potential Fatal Flaws | 1 | A161-4 |
| Designating Areas Larger than a Ranger District | 2 | A72-11, A75-8 |
| Staging Areas - DEIS Failures | 5 | A54-5, A130-12, A161-10, A161-12, A162-47 |
| Minimization Criteria | 2 | A86-38, A86-61 |
| Inventoried Roadless Areas - General | 2 | A79-16, A86-46 |


| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| Special Interest Areas (Land and Resource Management Plan Compliance) | 1 | A79-17 |
| Land and Resource Management Plan Consistency Rx8 | 24 | A55-12, A58-8, A58-14, A59-9, A79-15, A79-27, A90-16, A100-6, A110-12, A11018, A113-6, A113-11, A123-8, A131-7, A141-6, A143-5, A145-7, A145-15, A14516, A145-22, A162-37, C15-14, C20-6, C20-13 |
| Land and Resource Management Plan Consistency Rx10 | 1 | A100-8 |
| Land and Resource Management Plan Consistency -Rx-5 | 1 | A100-9 |
| Land and Resource Management Plan Consistency -Rx-14 | 1 | A100-7 |
| Best Available Science - All Resource Areas | 10 | ```A128-4, A162-21, A162-24, A162-25, A162-26, A162-27, A162-28, A162-29, A162-30, A162-61``` |
| Impacts Due to OSV Use - Lack of Documentation | 2 | A109-4, A162-14 |
| Groomed Trails / Routes - Future | 4 | A161-14, C16-4, C29-3, C31-5 |
| Access - Creating Barriers | 8 | A55-13, A80-7, A80-11, A87-1, A95-13, A100-12, A130-27, A161-17 |
| Non-traditional OSV Vehicles/Uses | 1 | A162-48 |
| Over-snow Vehicle Classes based on Width | 12 | A58-5, A61-12, A79-24, A90-6, A96-14, A113-3, A131-3, A162-19, A162-40, A16259, C22-14, C38-12 |
| Over-snow Vehicle Classes (Support) | 1 | A72-31 |
| Over-snow - Rubber-Tracked Vehicles | 1 | A105-1 |
| Over-snow Vehicles - Non-snow designed | 1 | A162-49 |
| No-action Alternative - described inaccurately | 1 | A145-5 |
| Viewpoint - Organization ORBA | 2 | A12-4, A162-44 |
| Eldorado Objections | 1 | A145-29 |
| Analysis - Biased | 9 | A109-3, A109-25, A130-8, A130-25, A130-28, A137-1, A164-3, C2-1, C38-3 |
| Travel Management Rule - Size of Areas | 5 | A72-7, A72-10, A72-13, A75-3, A75-20 |
| Travel Management Rule - Purpose and Need - Travel Management Rule | 3 | A72-9, A79-6, A130-23 |
| National Environmental Policy Act - Non-compliance | 1 | A86-60 |
| Range of Alternatives | 1 | A72-6 |
| National Forest Management Act | 1 | A86-9 |


| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| National Forest Management Act - Wildlife | 2 | A86-76, A86-77 |
| Endangered Species Act - Wildlife | 1 | A86-78 |
| Wilderness - Restrictions Unwarranted | 3 | A110-10, A145-14, C34-2 |
| Range of Alternatives - Wilderness - New Alternative | 2 | A86-32, A120-6 |
| Wild \& Scenic Rivers | 6 | A55-7, A123-7, A156-5, A158-5, C15-8, C20-14 |
| EIS Maps Legibility | 4 | A165-2, C18-4, C18-5, C20-5 |
| Air Quality - Analysis | 1 | A162-52 |
| Air Quality - General (Motorized viewpoint) | 2 | A37-2, A136-4 |
| Air Quality - General (Non-motorized viewpoint) | 1 | A37-9 |
| Climate Change - Inadequate Analysis | 4 | A37-4, A37-11, A72-53, A86-74 |
| Climate Change - Adequate Snowfall | 2 | A72-34, A75-10 |
| Noise/Solitude (Non-motorized viewpoint) | 6 | A37-13, A54-7, A65-1, A99-1, A122-1 |
| Noise/Solitude (Motorized viewpoint) | 5 | A103-4, A138-4, A158-10, B3-7, C4-2 |
| OSV Trails - Specific Routes (Botany) | 31 | A55-9, A55-10, A58-10, A58-13, A59-7, A69-4, A72-23, A77-12, A79-18, A79-19, A79-21, A79-22, A80-9, A86-56, A90-18, A96-5, A110-14, A110-17, A112-4, A11312, A123-10, A131-9, A131-12, A131-13, A145-18, C15-10, C25-11, C38-4 |
| Soils/Hydrology - DEIS | 3 | A109-5, A109-23, C15-1 |
| Hydrology - Water Quality / Sedimentation | 2 | A79-28, A120-12 |
| Vegetation management - General | 6 | A37-8, A44-19, A48-3, A55-11, A70-3, A109-26 |
| Suitable Terrain | 2 | A162-45, A162-46 |
| Aquatics - General | 1 | A158-7 |
| Aquatics - Emission Concerns | 3 | A37-7, A37-10, A120-9 |
| Visuals - General | 1 | A79-20 |
| DEIS - Wildlife (OSV Use of "harassment") | 2 | A109-12, A138-5 |
| Wildlife - Non-motorized vs. motorized effects | 4 | A27-3, A37-6, C16-5, C20-23 |
| CA Yellow/Red Legged Frog-DEIS Failures | 6 | A72-49, A86-44, A86-70, A86-71, A162-53, C20-22 |
| Wildlife concerns | 8 | A72-45, A72-47, A86-45, A86-64, A86-65, A86-66, A86-68, A86-69 |
| OSV Use - Bald Eagles (Support) | 1 | A54-4 |
| OSV Use - Bald Eagle (Non-Support) | 18 | A8-4, A39-2, A55-8, A58-6, A61-10, A69-8, A77-8, A80-5, A90-15, A96-10, A100- <br> 4, A108-9, A123-5, A131-6, A156-4, A164-1, c29-8, c38-8 |


| Comment Category | Number of Comments | Correspondence Number |
| :---: | :---: | :---: |
| Wildlife - illegal killing | 1 | A101-3 |
| Soils/Hydrology/Vegetation - DEIS Failures Alternatives 1, 2, and 4 | 1 | A86-47 |
| Comments referencing other comments | 6 | A86-25, A86-49, A99-3, A108-2, A120-13 |
| Travel Management - General | 2 | A86-79, A141-9 |
| Recreation - Pro OSV and Skier | 7 | A38-1, A39-1, A44-6, A44-26, A77-1, A83-5, A147-1 |
| OSV Use - Lakes / Open Water | 3 | A100-10, C5-4, C20-4 |
| Use of Areas - Non Motorized | 1 | A94-4 |
| No Further Response Required - Position Statement | 3 | A134-1, A134-3, A134-5 |
| Social Effects | 4 | A3-3, A85-1, A112-1, A125-2 |
| OSV Seasons of Use / Timing Restrictions | 4 | A72-33, A72-40, A72-41, A161-15 |
| Snow Depth - Operational Limitations | 2 | A109-16, A132-1 |
| Snow Depth - Limits Access | 5 | A95-10, A95-14, A95-15, A95-16, C29-1 |
| 12-inch Snow-Depth Requirement | 1 | A111-3 |
| OSV Use - Position Statement | 2 | A101-1, A101-4 |
| Forest Plan Revision and Wilderness | 1 | A86-31 |
| Wilderness - General | 2 | A75-5, A137-3 |
| Wilderness - Impacts to Future Designation | 2 | A86-8, A86-62 |
| New Alternative - Wilderness | 1 | A86-30 |
| EIS Maps - Accuracy | 1 | A72-4 |
| Allocation of Use - Bias | 5 | A80-23, A92-19, A108-4, A108-6, A145-4 |
| General Support | 1 | A86-1 |
| Biological Evaluation | 1 | A86-63 |
| Settlement Agreement | 1 | A162-30 |
| Range of Alternatives - Marten/Wildlife | 1 | A86-75 |
| User Conflict - Separation of Use Areas | 2 | A162-42, A162-43 |
| Access - Local Community | 2 | A104-4, A111-9 |
| Collaboration | 2 | A102-5, A110-21 |


| Comment Category | Number of <br> Comments | Correspondence Number |
| :--- | :---: | :--- |
| Public Involvement - Bias | 26 | A54-6, A60-4, A79-5, A89-1, A91-3, A102-1, A109-1, A109-27, A128-10, A161-19, <br> A164-2, A164-4, A164-5, A164-6, A165-3, C11-2, C12-1, C18-2, C18-3, C18-6, <br> C20-1, C20-3, C23-1, C32-1, C32-2, C32-3 |
| Public Involvement - Extension Requested | 7 | A76-9, A95-31, A128-11, A145-1, C13-1, C17-1, C18-1 |
| Public Involvement - Inadequacies | 2 | A8-5, A145-3 |
| Forest Service Leadership | 1 | A145-6 |
| DEIS - Stanislaus OSV | 2 | A79-7, A161-1 |

Table I-5. Concern categories, statements, and responses

| Concern Category | Concern Statement | Concern Responses |
| :--- | :--- | :--- |
| General Comments | $\begin{array}{l}\text { General comments supporting OSV } \\ \text { Designation. }\end{array}$ | Thank you for your comment and participation in the planning process. |
| $\begin{array}{l}\text { General Comments } \\ \text { (Motorized Viewpoint) }\end{array}$ | $\begin{array}{l}\text { General comments from the motorized } \\ \text { viewpoint. }\end{array}$ | $\begin{array}{l}\text { No further action required. These comments are general in nature, are a } \\ \text { position statement, or are conjectural in nature and not supported by scientific } \\ \text { evidence. }\end{array}$ |
| $\begin{array}{l}\text { General Comments (Non- } \\ \text { Motorized Viewpoint) }\end{array}$ | $\begin{array}{l}\text { General comments supporting creating } \\ \text { and/or protecting non-motorized use areas. }\end{array}$ | $\begin{array}{l}\text { No further response required. Comments are general in nature or position } \\ \text { statements. }\end{array}$ |
| Alternative 1 Support | $\begin{array}{l}\text { Commenters in support of Alternative 1 (No } \\ \text { Action) }\end{array}$ | $\begin{array}{l}\text { Thank you for your comment. We appreciate your interest and participation in } \\ \text { the planning process. }\end{array}$ |
| Alternative 2 Support | Commenters in support of Alternative 2 | $\begin{array}{l}\text { Thank you for your comment. We appreciate your interest and participation in } \\ \text { the planning process. }\end{array}$ |
| Alternative 2 - Modified | $\begin{array}{l}\text { Commenters in support of Modified } \\ \text { Alternative 2, with the following suggested } \\ \text { modifications: } \\ \text { * Do not allow grooming on Forest Road } \\ \text { 24N33 that would encourage snowmobiles to } \\ \text { trespass into Bucks Lake Wilderness } \\ \text { * Do not designate OSV use on or around } \\ \text { Lakes Basin Snowshoe and Ski Trails } \\ \text { * Do not allow snowmobiles in Little Jamison } \\ \text { Basin } \\ \text { * Do not allow snowmobile use in any } \\ \text { proposed wilderness areas, including Middle } \\ \text { Feather, Bucks Creek, Chips, Grizzly, \& } \\ \text { Adams Peak. }\end{array}$ | $\begin{array}{l}\text { Existing Forest Service groomed snowmobile trails are shown on a map } \\ \text { produced by the Plumas National Forest, in A Guide to Bucks Lake } \\ \text { Snowmobile Trails, (USDA 2009). This map illustrates that the Forest Service } \\ \text { currently grooms to Chuck's Rock, located on NFS Road 24N33, and the map } \\ \text { shows a designated ungroomed trail leading to Bald Eagle Mountain. OSV } \\ \text { use is already occurring in the area of Bald Eagle Mountain off of NFS Road } \\ \text { 24N33, and reducing this established groomed network would not be } \\ \text { beneficial to OSV users. A safe turn around for grooming equipment is needed } \\ \text { for all groomed trails. In order to accommodate a safe turn around for } \\ \text { grooming equipment on NFS Road 24N33, protect wilderness resources, and } \\ \text { continue to provide for motorized use already occurring, Alternative 2 of the } \\ \text { FEIS has been modified to allow grooming on 24N33 beyond Chucks Rock to } \\ \text { its intersection with NFS Road 24N89X and 24N89XA. This will help ensure } \\ \text { that motorized use is directed away from the wilderness and continue to }\end{array}$ |
| provide for established motorized use in the area. |  |  |$\}$


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 2 - Modified (continued) |  | Prohibiting OSV use in the entire Jamison basin was analyzed under Alternative 5, and the wild and scenic eligible Little Jamison Creek is not proposed for OSV use under Alternative 2. However, it would be a significant loss to motorized users if the area above Rock Lake under Alternative 2 became non-motorized, which OSV users have historically used. Motorized use occurs above Rock Lake, and much of the non-motorized use is below Rock Lake, thus Alternative 2 in the FEIS strikes a balance between motorized and non-motorized uses in the Jamison Basin - the northern portion of Jamison basin would remain open to OSV use in Alternative 2 of the FEIS, and in the southern portion of the Jamison Basin, OSV use would be prohibited. <br> The 2001 Roadless Rule allows motorized recreation within Inventoried Roadless Areas (IRAs). The Semi-Primitive Area Prescription (Rx-8) in the Plumas LRMP and IRAs (RARE II) generally overlap. Under Alternative 2, OSV use was not proposed in the majority of these Rx-8 prescriptions to protect the semi-primitive and non-motorized characteristics. Alternative 2 has been modified within the FEIS in the Chips Creek Semi-Primitive Area to exclude the Indian Springs area near the Lassen NF border and extend the non-motorized area of east of Yellow Creek to NFS Road 26N26. There are three areas near the Lassen National Forest border proposed in the FEIS as still open to OSV (near Ben Lomond Peak, Chambers Peak and Tobin Ridges) to allow for continuity in motorized opportunities in those open OSV areas from the Lassen National Forest. In the Lakes Basin, OSV use is proposed in Alternative 2 within the Semi-Primitive prescription ( $\mathrm{Rx}-8$ ) at Upper Little Jamison to provide opportunities for both motorized and nonmotorized opportunities. In Alternative 2, approximately half of the Lakes Basin and Dixon Creek Semi-Primitive Area Prescription (Rx-8) are open to OSV use in order to provide for access to motorized opportunities in those areas while still protecting the semi-primitive characteristics in the other half of these areas. The Middle Fork of the Feather River is already designated as a Wild and Scenic River under the Wild and Scenic Rivers Act, and OSV use is prohibited under all alternatives. There is a large non-motorized buffer area surrounding the entire Wild and Scenic designation on both sides which was already designated as non-motorized under the $\mathrm{Rx}-8$ prescription in Alternatives 2,3 , and 5 . |


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 2 - Modified Recommendations | Comments that support Alternative 2 but request the acknowledgment of the historic ski uses in the Onion Valley and the Middle Feather proposed wilderness area by not designating the portion of Onion Valley west of Placer Diggings, as well as Last Chance, Sawmill Tom, and Washington Creeks. The final plan should also protect the Wilderness potential within the Buzzards Roost Ridge roadless area, which receives little, if any, OSV use, by also not designating this area for OSV use. <br> In addition to what is included in Alternative 2, the final plan should not designate the Chips Creek proposed Wilderness area for OSV use (see Attachment 2). This is mapped in Alternative 5 and entails not designating the area west of the roadless area to the PNF boundary (except at Ben Lomond) and not designating the area west of 26N26 to Yellow Creek. | For the La Porte designated OSV use area under Alternative 2, the portion of Onion Valley that is west of Placer Diggings is adjacent to a groomed OSV route, and would likely invite conflict where it doesn't exist now if OSV use was prohibited in that area. Last Chance, Sawmill Tom, and Washington Creeks were already partially excluded from OSV use in the DEIS inside of the wild and scenic OSV closure of Middle Fork of the Feather River, and the Middle Fork Semi-Primitive Area prescription (Rx-8). The Buzzards Roost Ridge area would remain open to OSV use in the FEIS, as this area does not have a Roadless designation under the 2001 Roadless rule. The area west of Buzzards Roost Ridge (Dixon Creek) was already closed to OSV use in the DEIS because it is an eligible wild and scenic river. <br> In the Canyon OSV use area, Alternative 2 has been modified within the FEIS in the Chips Creek Semi-Primitive Area prescription (Rx-8) to exclude the Indian Springs area near the Lassen NF border and extend the non-motorized area of east of Yellow Creek to NFS Road 26N26. There are three areas near the Lassen National Forest border proposed in the FEIS as still open to OSV use (near Ben Lomond Peak, Chambers Peak and Tobin Ridges) to allow for continuity in motorized opportunities in those open OSV areas from the Lassen National Forest. Alternatives 3 and 5 considered exclusion of OSV use from the entire Chips Creek Semi-Primitive Area prescription (Rx-8) |


| Concern Category | Concern Statement | Concern Responses |
| :--- | :--- | :--- |
| Alternative 2 Modifications <br> Recommended | Comments that recommend specific <br> modifications to alternative 2. Forest to <br> review for consideration. | Antelope and Frenchman open area boundaries follow Indian Creek where <br> there are two locations that users can feasibly cross-Antelope Dam and <br> Babcock Crossing. Davis and Frenchman open area boundaries follow a |
|  |  | natural boundary as Red Clover Creek and Clover Valley is a large (7 miles) <br> section of private land. The remainder of this boundary, about 5 miles, follows <br> the Beckwourth-Genesee Plumas County road. There are limited crossings <br> along this boundary as well-Knotson Bridge, Drum Bridge, a bridge at NFS |
|  |  | road 25N05, and Plumas County road 177. At Janesville Grade specifically, <br> there are no topographic features with the exception of Janesville Grade (NFS |
|  | road 28N01 and Plumas County road 208). Topographic features were |  |
| considered when identifying discrete open areas for this project. |  |  |


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 2 Modifications Recommended (continued) |  | 5. Remove proposed designated OSV open area in and around the Gold Lake ski trail, adjacent to the Gold Lake staging area, including Gray Eagle Creek (NFS lands west of Plumas County Road 519). The area removed extends from the southern edge of private land near Graeagle, Gray Eagle Creek, the Gold Lake ski trail, and NFS lands that reach the Graeagle Lodge. NFS lands east of Plumas County Road 519 are generally designated as open. This change separates motorized and non-motorized uses, such that OSVs are not crossing or using a non-motorized trail or Gray Eagle Creek. <br> Lakes Basin Open Area <br> 1. Redraw open area in Lakes Basin. Propose designation of open area from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and use ridge toward Graeagle Lodge as boundary change. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for nonmotorized opportunities. <br> 2. Propose designation of NFS lands in section 3 nearest to "A Tree" adjacent to the Tahoe and Plumas National Forests administrative boundary. <br> 3. Adding section 3 near A Tree allows for motorized use from the Tahoe onto the Plumas and provided connectivity from NFS road 23N08 onto Plumas County Road 507. These roads provide access to the larger La Porte open area, La Porte, and Onion Valley. <br> 4. Remove proposed designated open area in sections 29 and 32 near $A$ Tree Campground in between McRae Ridge and NFS road 23N08, and immediately adjacent to the La Porte and Lakes Basin open area unit boundary. <br> 5. Remove proposed open area designation in section 33 to provide contiguous areas not designated for OSV use within sections 32,33 , and 34 as this has high value to non-motorized users. Designation of NFS Road 23N08 allows OSV access through the closed area from Lakes Basin to La Porte. <br> Designate NFS road 23N08 as an ungroomed OSV trail to provide access across undesignated NFS lands between open areas, and to provide access to open areas from Sloat. Designation of NFS road 23N08 overlies Lakes Basin and La Porte open areas. |


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 2 Modifications Recommended (continued) |  | La Porte Open Area <br> Just north of Harrison Campground redraw the open boundary to include NFS 23N10 extreme eastern portion of the road. Insignificant change for motorized uses, portion of SIA that would become open is extremely steep and densely vegetation and would not likely receive OSV use. <br> Davis Open Area <br> Designate NFS lands just south of Indian Valley, towards the east near Iron Dyke, along Plumas County Road 208. Designate NFS lands on the eastern edge of Greenville overlaying with NFS road 28N32. This addition provides connectivity from private land and NFS lands proposed for designation for cross county OSV travel. <br> Antelope Open Area <br> Designate NFS lands along North Arm in Indian Valley south of Engel Mine to provide access from private land to designated NFS lands as open areas allowing cross-country travel. <br> Pacific Crest Trail Areas Not Designated for OSV Use <br> Seventy-nine miles of the Pacific Crest Trail cross the Plumas National Forest administrative boundary from the Lassen to the Tahoe National Forests. Almost 18 miles of the PCT overlie designated wilderness or special areas leaving just over 61 miles of PCT to evaluate the purpose and nature of the trail and use of over-snow vehicles. <br> Areas not designated for OSV use are not applied when the PCT overlies and is adjacent to undesignated NFS lands or when NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT. Undesignated NFS lands do not authorize OSV use on or adjacent to the PCT and an area not designated for OSV use adjacent to the PCT is not necessary. NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT within the designated 500 -foot area not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> An area not designated for OSV use is applied at Bucks Summit a congested, high-use staging area; the eastern side of the Middle Fork Wild and Scenic River to provide a noise buffer; and from the general area of Onion Valley to McRae Ridge to include the preservation of historic ski trails. |


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 2 Modifications Recommended (continued) |  | Bucks Summit <br> 1. From Bucks Summit staging area off of Plumas County Road 414, heading south along the PCT, increase areas not designated for OSV use in between two designated and groomed OSV trails: NFS roads 24 N 29 Y and Plumas County Road 119 (Big Creek Road). On the west side of the PCT, the area not designated for OSV use starts along the ridge in between NFS road 24N29Y and the PCT. On the east side of the PCT, the area not designated for OSV use extends from the Bucks Summit trailhead to the Plumas County Road 119. NFS lands adjacent to Plumas County Road 414 near Deadwood Creek and adjacent to private lands were also included in the areas not designated for OSV use. <br> The Bucks Summit trailhead receives both non-motorized and motorized uses. The areas not designated for OSV use provide a noise barrier along the PCT in a congested area. This segment of the PCT provides about 3 miles of gentle terrain to the south of Bucks Summit. <br> Intersection of NFS road 24N29Y and Plumas County Road 119 (Big Creek Road) to Lookout Rock <br> 1. Remove entire areas not designated for OSV use adjacent to PCT because motorized roads and trails intersect and parallel the PCT within the previous 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> Lookout Rock to Butte Bar Campground <br> 1. Remove entire areas not designated for OSV use adjacent to the PCT because a buffer or zone in this section of the PCT is not necessary since it overlies NFS lands that are not designated for cross-country OSV travel. This area is also a Semi-Primitive area ( $\mathrm{Rx}-8$ ) from the 1988 Plumas National Forest LRMP, and there are very few existing roads. There are no roads or motorized trails in the vicinity of the PCT. <br> Butte Bar Campground to southeast corner of section 1 (T22N, R8E) <br> 1. Remove entire areas not designated for OSV use adjacent to the PCT because this section of the PCT overlies NFS lands that are not designated for cross-county OSV travel. <br> Southeast corner of section 1 to intersection with NFS road 22N56 <br> 1. Remove areas not designated for OSV use adjacent to PCT because NFS roads (23N65Y, 23N65YB, and 22N56) parallel the PCT within the previous 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. |


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 2 Modifications Recommended (continued) |  | Intersection with NFS road 22N56 to east side of private land in section 11 <br> (T22N, R8E) <br> The Fowler Lake area overlaps with a Special Interest Area or Research Natural Area and overlies NFS lands that are not designated for cross-country travel, so a non-motorized buffer is not necessary within the Fowler Lake SIA. Two parcels of private land overlie the PCT and are not designated for crosscountry travel. Areas not designated for OSV use is not necessary in these locations. <br> 1. Remove the areas not designated for OSV use adjacent to the PCT from the intersection of NFS road 22N56 and then again from the eastern edge of the SIA/RNA to the eastern edge of the private land parcel in section 11. <br> There are roads adjacent to PCT in Section 15 and there is no non-motorized continuity in this area between the private parcels. <br> Private land in section 11 to intersection of Plumas County Road 511 (Forest Highway 120) <br> 1. Remove areas not designated for OSV use adjacent to the PCT because two designated, groomed trails (NFS road 22N60 and Plumas County Road 120 ) crisscross and parallel the PCT. These roads are within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> Plumas County Road 511 to Intersection of Plumas County Road 507 and NFS Road 22N46 <br> 1. Remove areas not designated for OSV use from County Road 511 to the PCT's intersection with NFS Road 22N82X. <br> 2. Maintain an area not designated for OSV use adjacent to the PCT at the intersection with NFS Road 22N82X, around the northeast side of Pilot Peak, and adjacent to the PCT along Bunker Hill Ridge, southeast to where the PCT is within the Semi-primitive Prescription ( RX -8). A widened area not designated for OSV use along the PCT both meets the nature and purpose of the trail, and recognizes historic uses of the trail as the 'Lost Sierra Ski Traverse.' |


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 2 Modifications Recommended (continued) |  | NFS Road 22N46 to Tahoe National Forest (administrative boundary) <br> 1. Remove areas not designated for OSV use adjacent to PCT because the PCT parallels NFS 22N46 and then crisscrosses two national forest administrative boundaries numerous times. Generally, NFS lands are designated as open on both national forests; the Tahoe National Forest selected alternative does not include areas not designated for OSV use adjacent to the PCT. Given the PCT crisscrosses administrative boundaries, areas not designated for OSV use adjacent to the PCT in only the Plumas National Forest results in fragments of non-motorized areas that are impractical for implementation. <br> General Changes <br> 1. Generally, remove designated ungroomed OSV trails that overlap with open areas. All designated ungroomed OSV trails that cross private ownerships, restricted and prohibited areas, or connect open areas should remain for designation to illustrate the trail is needed to access an otherwise prohibited or restricted area. <br> 2. Our current action alternatives include county roads as proposed designated NFS OSV trails and in most cases grooming. Based on current jurisdiction in Infra, these roads are not aligned with Travel Management Rule, Subpart C regulations, such that the Forest Service should not designate county roads as NFS OSV trails. Remove county roads, with county jurisdiction, from all action alternatives, from proposed designation as NFS OSV trails. <br> Maintain county roads, with county jurisdiction, in all action alternatives that are proposed for grooming. These will be displayed on our alternative maps as "other groomed OSV trails" and will not be designated as NFS OSV trails. |


| Concern Category | Concern Statement | Concern Responses |
| :--- | :--- | :--- |
| Alternative 2 Modifications <br> Recommended (continued) |  | 3. Change vehicle class definition from width to pounds per square inch. <br> Vehicle class is now defined by the ground pressure exerted by different types <br> of OSVs to better align with potential resource impacts (as heavier vehicles <br> create deeper tracks and can potentially cause resource damage). The <br> revised Class 1 OSVs include those that typically exert a ground pressure of <br> 1.5 pounds per square inch (psi) or less. This class includes snowmobiles, <br> tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked utility terrain <br> vehicles (UTVs), and snowcats. The revised Class 2 OSVs include those that <br> typically exert a ground pressure of more than 1.5 psi. This class includes <br> tracked four-wheel drive (4WD) sport utility vehicles (SUVs) and tracked 4WD <br> trucks. Class 1 will be able to operate on areas and trails designated for OSV <br> use while Class 2 will be restricted to designated OSV trails available for <br> grooming." <br> 4. Miscellaneous parcels of NFS land that were inaccessible islands were <br> deleted. |
| Alternative 3 Support |  | Thank you for your comment. We appreciate your interest and participation in |
| Alternative 4 Support | Comments in support of alternative 3 | Commenters in support of alternative 4 <br> the planning process. |
| Alternative 4 - Opposition | Commenter who states that alternative 4 is | Thank you for your comment. We appreciate your interest and participation in <br> the planning process. |
| No further action required. Position statement. |  |  |


| Concern Category | Concern Statement | Concern Responses |
| :---: | :---: | :---: |
| Alternative 5 Support | Commenters in support of alternative 5 | Thank you for your comment. <br> Modifications were made to alternative 2 (modified proposed action) and are located in the FEIS. National Forest System (NFS) road 24N33 will remain as a designated and groomed NFS over-snow vehicle (OSV) trail; however, it was recommended by commenters to designate an additional road to lead OSV users away from the Bucks Lake Wilderness, provide additional groomed trails, and provide a safe turnaround location for the grooming machine. Knowledge of road locations on the landscape informed that NFS road 24N33 was rerouted into 24 N 98 X and that the 24 N 33 A (spur) no longer exists. From Plumas County road 414, designate and groom NFS road 24N33 to the intersection of NFS road 24N89X. Continue grooming 24N89X to the intersection of 24N89XA. |
| Alternative 5 Support (continued) | Commenters in support of alternative 5 | A very small portion of previously designated open area in the Lakes Basin area near Gold Lake staging area and adjacent to the Gold Lake nonmotorized trail was removed from designation (NFS lands west of Plumas County road 519). The area removed extends from the southern edge of Graeagle, Gray Eagle Creek, the Gold Lake non-motorized trail, and NFS lands that extend to the Graeagle Lodge. NFS lands east of Plumas County road 519 are generally designated as open. This change prohibits OSV use along, across, and around the non-motorized trail, including Gray Eagle Creek, to provide a non-motorized experience, reduce use conflicts, and prohibits crossing Gray Eagle Creek to protect water quality. Modifications were made in the Lakes Basin area near Rock Lake and Mt. Elwell. The designated open areas in this specific location were redrawn to include NFS land from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern portion of Rock Lake, to Mt. Elwell, and followed the ridge toward Graeagle Lodge. NFS lands north of this "line" which includes the northwestern portion of Mt. Elwell are not designated as open, while NFS lands to the south of this "line" which includes Rock Lake are designated as open for OSV use. This change was suggested in public comments and strikes the best balance between uses based on site specific comments received. |
| Alternatives 1 and 4 Support | Commenters in support of alternative 1 and alternative 4. | Thank you for your comment. We appreciate your interest and participation in the planning process. |


| Concern Category | Concern Statement | Concern Responses |
| :--- | :--- | :--- |


| Concern Category | Concern Statement | Concern Responses |
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| Alternatives 3 and 5 Modifications (continued) |  | Prohibiting OSV use in the entire Jamison basin was analyzed under alternative 5, and the wild and scenic eligible Little Jamison Creek is not proposed for OSV use under alternative 2. However, it would be a significant loss to motorized users if the area above Rock Lake under alternative 2 became non-motorized, which OSV users have historically used. Motorized use occurs above Rock Lake, and much of the non-motorized use is below Rock Lake, thus alternative 2 - modified in the FEIS strikes a balance between motorized and non-motorized uses in the Jamison Basin-the northern portion of Jamison basin would remain open to OSV use in alternative 2 of the FEIS, and in the southern portion of the Jamison Basin, OSV use would be prohibited. <br> Alternative 5 restricts OSV use almost entirely in all inventoried roadless areas. The 2001 Roadless Rule allows motorized recreation within Inventoried Roadless Areas (IRAs). The Semi-Primitive Area Prescription (Rx-8) in the Plumas LRMP and IRAs (RARE II) generally overlap. Under alternative 2, OSV use was not proposed in the majority of these Rx-8 prescriptions to protect the semi-primitive and non-motorized characteristics. Alternative 2 has been modified within the FEIS in the Chips Creek Semi-Primitive Area to exclude the Indian Springs area near the Lassen NF border and extend the non-motorized area of east of Yellow Creek to NFS Road 26N26. There are three areas near the Lassen National Forest border proposed in the FEIS as still open to OSV (near Ben Lomond Peak, Chambers Peak and Tobin Ridges) to allow for continuity in motorized opportunities in those open OSV areas from the Lassen National Forest. In the Lakes Basin, OSV use is proposed in alternative 2 within the Semi-Primitive prescription ( $\mathrm{Rx}-8$ ) at Upper Little Jamison to provide opportunities for both motorized and nonmotorized opportunities. In alternative 2, approximately half of the Lakes Basin and Dixon Creek Semi-Primitive Area Prescription (Rx-8) are open to OSV use in order to provide for access to motorized opportunities in those areas while still protecting the semi-primitive characteristics in the other half of these areas. The Middle Fork of the Feather River is already designated as a Wild and Scenic River under the Wild and Scenic Rivers Act, and OSV use is prohibited under all alternatives. There is a large non-motorized buffer area surrounding the entire Wild and Scenic designation on both sides which was already designated as non-motorized under the Rx-8 prescription in alternatives 2,3 , and 5 . |


| Concern Category | Concern Statement | Concern Responses |
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| $\begin{array}{l}\text { Alternatives } 3 \text { and } 5 \\ \text { Modifications (continued) }\end{array}$ |  | $\begin{array}{l}\text { Within the areas of Elephant's Playground, Papoose, Willow Creek, and } \\ \text { Rowland Creek the commenter references, these areas are not designated as } \\ \text { roadless areas under the 2001 Roadless Rule, and are also not designated as } \\ \text { Semi-Primitive Area Prescription (Rx-8) under the Plumas LRMP, therefore }\end{array}$ |
| these areas were designated as open to OSV use because they lie with |  |  |
| OSV-use areas. |  |  |$\}$


| Concern Category | Concern Statement | Concern Responses |
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| $\begin{array}{l}\text { OSV Use Designation - } \\ \text { General Support }\end{array}$ | $\begin{array}{l}\text { Commenters who express general, non- } \\ \text { specific support of Subpart C and OSV Use } \\ \text { Designation. }\end{array}$ | $\begin{array}{l}\text { Motorized over-snow vehicle use is recognized as an appropriate use of NFS } \\ \text { lands. }\end{array}$ |
| $\begin{array}{l}\text { OSV Use Designation - Non- } \\ \text { Support }\end{array}$ | $\begin{array}{l}\text { Comments not in support in the OSV Use } \\ \text { Designation project. }\end{array}$ | $\begin{array}{l}\text { Thank you for your comment. We appreciate your interest and participation in } \\ \text { the planning process. }\end{array}$ |
| $\begin{array}{ll}\text { OSV Use - Oppose any } \\ \text { Closure }\end{array}$ | $\begin{array}{l}\text { Commenters opposing any OSV closures or } \\ \text { restrictions }\end{array}$ | $\begin{array}{l}\text { Motorized over-snow vehicle use is recognized as an appropriate use of NFS } \\ \text { lands. } \\ \text { The preamble to the Multiple-Use Sustained-Yield Act of 1960 states, "An act } \\ \text { to authorize and direct that the national forests be managed under principles } \\ \text { of multiple use and to produce a sustained yield of products and services, and } \\ \text { for other purposes". Under the multiple-use principle the Forest Service }\end{array}$ |
| manages winter uses to protect National Forest System (NFS) resources and |  |  |
| to provide a range of opportunities for motorized and non-motorized |  |  |
| recreation. National Forests should provide access for both motorized and |  |  |
| non-motorized uses in a manner that is environmentally sustainable over the |  |  |
| long term. The National Forest System (NFS) lands are not reserved for the |  |  |
| exclusive use of any one group, nor must every use be accommodated on |  |  |
| every acre. It is entirely appropriate for different areas of the NFS lands to |  |  |$\}$


| Concern Category | Concern Statement | Concern Responses |
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| OSV Use Restrictions / <br> Economics (continued) | Commenters are concerned with OSV use restrictions and how this will affect local economies. | The importance of recreation to the local economy is recognized within the affected environment section of the socioeconomic report, economic contributions specifically recognize the difference in spending profiles between motorized winter sport visitors and non-motorized winter sport visitors and the economic effects methodology accounted for the difference in the spending profiles to estimate effects. It is important to note that the contributions from recreation outlined in the At-A-Glance (AAG) report for the Plumas National Forest account for the effects of all recreation on the Plumas, and OSV recreation is but one of a diversity of recreation activities managed on the Plumas NF. The recreation visitation data presented in the affected environment section of the socioeconomic report demonstrates that snowmobiling is but one of many recreation activities on the forest. The estimated recreation participation for snowmobiling was adjusted based on data from the California State Environmental Impact Report trailhead survey to account for what appears to be under-accounted for in the 2015 NVUM survey results. The adjusted figures are yet still a fraction of all the other recreation activities influencing economic character of the local economy. It should also be noted that the scope of potential economic effects of this project are limited changes in recreation participation of snow-dependent activities, as this project does not propose changes to motorized and non-motorized recreation activities that are not snow-dependent. <br> It is important as well to put recreation contributions in context of all Plumas national forest contributions, the largest contributions to jobs and income noted in the at-a-glance (AAG) report was first, Forest Service Resource Management Investments followed by forest products. Together these two categories were estimated to contribute 1290 jobs and 65.7 million in labor income. Likewise recreation was estimated to account for 220 total jobs and $\$ 7.9$ million annually within the 22 county analysis area that was modeled in the AAG report. To note the economic analysis area that the 2016 AAG economic contributions were modeled on was defined by breadth Forest Service programs and their related economic linkages to surrounding communities, and not limited specifically to recreation linkages. The analysis area for this project was defined as a five-county analysis area that is most acutely affected by changes in recreation opportunity in the Plumas National Forest. |


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| Concern Category | Concern Statement | Concern Responses |
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| Economic Impacts - OSV Use (continued) | Commenters concerned with the economic impacts to the local economy due to OSV Use designation. Input was provided about both motorized and non-motorized use trends. | The economic effects of the project will be weighed by the responsible official in the decision-making process. The economic analysis considers direct, indirect, and induced economic effects. Direct economic impacts are generated by the activity itself, such as gasoline, lodging and food purchases made by visitors within 50 miles of the Forest. Indirect employment and labor income contributions occur when a sector purchases supplies and services from other industries in order to produce their product. Induced contributions are the employment and labor income generated as a result of spending new household income generated by direct and indirect employment. Indirect and induced economic impacts would influence industries such as real estate and service industries not directly related to recreation. Employment estimates include any part-time, seasonal, or full-time job. The economic analysis focuses on counties most acutely affected by Plumas National Forest recreation visitor spending and is modeled using the National Visitor Use Monitoring survey results, California OSV Trailhead Survey Results and California OSV registration data to estimate visitation and associated spending patterns within 50 miles of the forest. <br> Popular recreation opportunities associated with Bucks Lake, Graeagle, La Porte, and Lake Davis that influence economic development opportunities for businesses in the immediate area or neighboring community would continue to be available. The preferred alternative would continue to provide OSV crosscountry and motorized trails recreation opportunities. Lands open to crosscountry OSV located at 3,500 ' elevation and above would be reduced by $20 \%$ from the no action alternative to 864,826 acres. Lands characterized in the analysis as high quality OSV areas - areas above 5,000' elevation where snowpack is relatively reliable, tree canopy closure is less than $70 \%$ and the slope is less than $21 \%-$-would be reduced by $7 \%$. None of the action alternatives restrict or limit the season when OSV trail or cross-country use is allowed. Consideration of the distribution of economic effects by alternatives is addressed in the socioeconomic section under the heading economic activity. |


| Concern Category | Concern Statement | Concern Responses |
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| Economic Impacts - OSV Use (continued) | Commenters concerned with the economic impacts to the local economy due to OSV Use designation. Input was provided about both motorized and non-motorized use trends. | There are numerous factors that influence recreation participation beyond the extensiveness of recreation opportunities (White \& Bowker 2014). Population change and proximity to recreation settings is one of the main factors that influence recreation visitation, however, other factors that are beyond the scope of this decision and within the sphere of control of local community leaders may also influence the economic impacts to local communities. Localized economic effects in response to OSV designation may be influenced by how businesses and community leaders communicate the outcomes of the OSV designation process to the visitor community. For example, should nonlocal visitors come to believe that there are no longer OSV recreation opportunities on the Plumas, they will likely opt to visit other National Forests and neighboring communities who have communicated the quantity and quality of their OSV recreation opportunities. Communicating the snowdependent recreation opportunities available on the forest to existing and potential clientele will be key to sustaining winter recreation participation. To note, neighboring National Forests such as the Tahoe and Lassen, in addition to all national forests with OSV use opportunities, are also subject to comply with the subpart C of the Travel Management Rule ( 36 CFR 215.12 ). Therefore there is no substitute option that visitors could opt to visit that provide unregulated OSV opportunities that would divert visitation from the Plumas National Forest. The action alternatives also provide for nonmotorized recreation activities which are also popular winter recreation activities that contribute to the economic health of local communities. It is also important to note that the supply of recreation settings is one of many factors that influence recreation participation. Other factors that may influence recreation participation include changes in population size and demographics, technology, climate, and larger economic trends (White \& Bowker 2014). This project's affects are limited to the supply, diversity and quality of snowdependent recreation opportunities on the Plumas National Forest. This project is not likely to influence recreation preferences. Given that: there is a relatively limited reduction in quantity of OSV opportunities and that the quality of OSV opportunities are maintained or improved; given that people who have favorable attitudes towards OSV recreation would continue to participate in these activities; and given that there are no substitute options for unregulated OSV use that may influence a change visitation patterns, it is likely that recreation visitation to the forest for the purpose of participating in OSV activities and non-motorized winter activities will continue under the preferred alternative. Visitor expenditures would also maintain similar spending patterns associated with the OSV visitation. It is also reasonable to assume that expenditures in the local economy will continue to support local tax revenues, and that people will continue to register their OSVs providing tax revenue to support OSV trail grooming. |


| Concern Category | Concern Statement | Concern Responses |
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| Economic Impacts - OSV Use (continued) | Commenters concerned with the economic impacts to the local economy due to OSV Use designation. Input was provided about both motorized and non-motorized use trends. | There are many variables that affect property values, the potential limited effects of this project are anticipated to have no effect on real estate values. Therefore there are no direct or indirect economic impacts to communities reliant, in part, on OSV expenditures is not anticipated. <br> The OSV grooming program is approved by the State Historic Preservation Officer under a programmatic agreement that requires a 12" snowpack to mitigate potential impacts to cultural resources. This 12" requirement has not resulted in the cessation of OSV opportunities in the past and there is no evidence to assume that the 12 " snow requirement would result in reduced recreation opportunities and related visitation in the future. |
| Economics - DEIS Failures | Comments that indicate the DEIS fails to address economic impacts. | The Multiple-Use Sustained-Yield Act of 1960 authorizes and directs the national forests to be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes. Under the multiple-use principle, the Forest Service manages winter uses to conserve and sustain National Forest System (NFS) resources and provide a range of opportunities for motorized and non-motorized recreation. National forests are managed to provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. National Forest System (NFS) lands are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is appropriate for NFS lands to provide different recreation opportunity settings. <br> The socioeconomic analysis considers the changes in the quantity and quality of motorized and non-motorized snow-dependent recreation opportunities, and related direct, indirect and induced economic impacts due snow-dependent recreation activities for all the alternatives. See the affected environment section and the environmental consequences sections of the socioeconomic analysis for more information. <br> Data on OSV registration in California 2009 through 2018 (State of California OSV registration data; International Snowmobile Manufacturer data on U.S. Snowmobile Registration History) reveals that the $43 \%$ increase in OSV use that was predicted in the State of California report Over Snow Vehicle Program Draft EIR were not realized. Snowmobile Industry data demonstrates a $43 \%$ decrease in OSV registration, while data from the State of California demonstrates a slight decrease of $2 \%$ at the State level. Other predictions within the State OSV DEIR are predicted changes based on a set of assumptions identified in that environmental analysis. The data and methodology that provides the basis for the socioeconomic effects related to non-motorized snow-dependent activities are located in the methodology and affected environment sections of the socioeconomic analysis with further supporting documentation in the project record. |


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| OSV Use - Considerations | Commenters who indicate that local and <br> historical land use needs as well as past <br> resource damage need to be considered in <br> further OSV use reductions. Two topics <br> include 1) How did we use historical land use <br> to inform the analysis? and 2) where/what is <br> the documentation that indicates "damage". | The process of applying minimization criteria and mitigations for OSV areas <br> and trails considered existing land uses, and is documented in Appendices D <br> and E of the FEIS volume II. The following criteria consider existing land uses <br> and are described for each OSV area and trail: <br> (b)(3) Minimize conflicts between motor vehicle use and existing or proposed <br> recreational uses of National Forest System lands or neighboring Federal <br> lands, <br> (b)(4) Minimize conflicts among different classes of motor vehicle uses of NFS <br> lands or neighboring Federal lands <br> (b)(5) Consider compatibility of motor vehicle use with existing conditions in |
|  |  | populated areas, taking into account sound, emissions, and other factors. |
|  |  | Similarly, the minimization criteria and mitigations for OSV areas and trails <br> considered known and potential resource damage and is documented in |
|  |  | Appendices D and E of the FEIS volume II. The following criteria consider <br> potential resource damage and rea described for each OSV area and trail: <br> (b)(1) Minimize damage to soil, watershed, vegetation, and other forest |
| resources. |  |  |
| (b)(2) Minimize harassment of wildlife and significant disruption of wildlife |  |  |
| habitats. |  |  |


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| OSV Restrict Use - General | Comments that favor OSV restrictions in <br> certain areas. | Motorized over-snow vehicle use is recognized as an appropriate use of NFS <br> lands. <br> The criteria for designation of roads, trails, and areas for OSV use in the Final <br> Travel Management Rule, Subpart C (effective January 27, 2015) specifically <br> requires the Responsible Official to consider effects of OSV use on natural <br> resources and conflicts between OSV use and existing or proposed <br> recreational uses of NFS lands (including non-motorized winter recreational <br> uses) with the objective of minimizing those impacts and conflicts (36 CFR |
| $212.55(b)$ and 212.81(d)). |  |  |


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| OSV Restrict Use - Grizzly Ridge | Commenters who support OSV Restricted Use in the Grizzly Ridge Area. Comments are both specific and non-specific to the Grizzly Ridge Area | Rx-8 Semi-Primitive Area Prescription is described in the PNF LRMP on page $4-88-4-90$. The description of $R x-8$ states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area. The prescription applies to the following roadless areas: Bald Rock, Beartrap, Chips Creek, Dixon Creek, Grizzly Ridge, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak" (PNF LRMP, p. 4-88). General direction includes "provide a non-motorized experience (1a)" and standards and guidelines state "allow no motorized travel except over-the-snow and management access" (PNF LRMP, p.4-88). <br> Semi-Primitive Area Prescription (Rx-8) of the 1988 Plumas National Forest Land and Resource Management Plan (LRMP) was not recommended for designation in open areas to minimize effects to the semi-primitive nature of Rx-8. The Semi-Primitive Prescription description in the LRMP emphasizes non-motorized recreation and states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow nonmotorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area" and applies to a total of 79,500 acres of NFS land (p. 4-88). |
| OSV Restrict Use - Lost Sierra Ski Traverse | Comments that identify the Lost Sierra Ski <br> Traverse between Johnsville and Onion Valley, and suggest restrictions to OSV use in this area. <br> 44-9: particularly on land in and around Johnsville extending to Onion Valley. I believe the PNF should do more to both acknowledge and promote the unique ski history of the region. <br> 44-10: I hope The Lost Sierra Traverse and historic skiing areas closer to the Johnsville "front-country", adjacent to Plumas Eureka State Park, can become a PNF recognized, designated, and protected non-OSV, historic skiing and "quiet mountain sports" area.; 44-16: Recommends non-motorized PCT corridor to include the Lost Sierra Ski Traverse and notes that winter use of PCT does occur in this area. | Thank you for your comments. <br> Alternative 2 of the FEIS has been modified to maintain areas not designated for OSV use adjacent to the PCT at the intersection with NFS Road 22N82X, around the northeast side of Pilot Peak, and adjacent to the PCT along Bunker Hill Ridge, southeast to where the PCT is within the Semi-primitive Prescription (RX-8), near McRae Ridge. A widened area not designated for OSV use along the PCT both meets the nature and purpose of the trail, and recognizes historic uses of the trail as the 'Lost Sierra Ski Traverse.' |


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| OSV Restrict Use - Low Elevation | Commenters wanting OSV use restricted in low elevation, winter habitat areas. <br> 1. Several commenters suggest the Forest Service should restrict OSV use in low elevation areas to protect winter big game from OSV related disturbance and habitat damage, and evaluate site-specific impacts of permitting OSV use in particular open areas or on particular open routes, including indirect effects to the wolf. <br> 2. The DEIS includes confusing and potentially conflicting information about the extent of deer winter range designated for OSV use. Table 52 shows 208 acres of mule deer winter range designated for OSV use under alternative 2, and up to 117,652 acres of mule deer winter range (approximately $50 \%)$. Yet, in the context of analyzing effects on gray wolves, Table 35 at page 167 shows 30,751 acres of deer winter range "affected by OSV use" under alternative 2, and 41,477 acres affected under alternative 4. | 1. Mule deer are considered a Forest Service Management Indicator Species for oak-associated hardwood and hardwood conifer in the Sierra Nevada bioregion (FEIS volume I pages 204-206). The FEIS provides mule deer winter management (volume I pages 18,164 ) and plan effectiveness monitoring (volume I page 35) direction. The FEIS discusses ecological requirements of wintering deer, potential project impacts, indicators and mitigations developed to minimize impacts under each alternative (volume I pages 61-62,163,173-174,205,206) and each designated open area and trail (volume II pages $70,81-83,92,93,101-103,111,112,120,121,137,138)$. Mule deer are a primary prey species for gray wolf (endangered species) in the planning area, and the FEIS describes wolf distribution and ecology, potential direct, indirect and cumulative effects of the project (for each alternative), including how indirect effects on wolf may occur via disturbance to prey (volume I pages 18, 62,170,173-174,205; volume II pages $70-138$ ). The FEIS indicates the Forest Service has implemented mule deer winter range management direction, and after analysis of potential direct, indirect and cumulative effects has restricted OSV use in key wintering areas and evaluated and minimized potential impact along all trails and open areas overlapping winter range. |
| OSV Restrict Use - Low Elevation (continued) |  | 2. Confusion about the extent of deer winter range may have been confusing because Table 52 summarizes mule deer winter range designated for OSV use throughout the entire planning area; whereas, Table 35 is evaluating potential impacts to mule deer winter range within and adjacent to occupied wolf habitat (Antelope Area). Deer winter range would not be designated for OSV cross-country use in the Antelope Area, where wolf currently occur (FEIS volume II page 71). |
| OSV Restrict Use - Middle Fork Feather River | Commenters who want OSV use restricted on the Middle Fork of the Feather River. | In compliance with the Forest Plan, the Wild zone of the Middle Fork Feather Wild and Scenic River is not designated for OSV use in any of the alternatives. FEIS volume II, page 41. This includes 10,813 acres where OSV use is prohibited within 0.25 mile of wild segments of Wild and Scenic Rivers, in compliance with Rx-2 Wild and Scenic River Prescription in the Plumas Forest Plan to maintain the area's outstanding values and primitive recreation settings. FEIS volume I, page 58. |


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| OSV Use - Goose and Haven <br> Lakes | Comments concerned with OSV Use <br> designation for Goose and Haven Lakes. | The largest known Sierra Nevada yellow-legged frog population on the <br> Plumas National Forest occurs within the proposed Lakes Basin designated <br> over-snow vehicle area, which encompasses the Goose and Haven lakes area <br> located in the species' designated critical habitat subunit 2B (Gold Lake). The <br> presence of groomed trails in this area may increase over-snow vehicle use <br> over time and thereby increase the risk of localized habitat degradation <br> caused by, in part, increased soil erosion, sedimentation, and noise <br> disturbance. The prohibition of cross-country (off-trail) over-snow vehicle use <br> in occupied designated critical habitat within the area south of Gold Lake and |
| in the vicinity of Goose and Haven lakes under alternatives 2, 3, and 5 would |  |  |
| minimize the risk of localized habitat degradation and help protect the largest |  |  |
| known Sierra Nevada yellow-legged frog population on the Plumas National |  |  |
| Forest. Over-snow vehicle use would be allowed in these areas on designated |  |  |
| snow trails possessing adequate snow depths. |  |  |


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| Hybrid Alternative - Bucks Lake Area | The commenter recommends a hybrid alternative which incorporates components of alternative 2 and alternative 5 , as well as, suggestions provided to the FS during scoping. <br> Recommendations Friends of Plumas Wilderness strongly recommends that OSV use be prohibited below 5,000 feet in elevation to protect a larger portion of Sierra Nevada yellow-legged frog Critical Habitat Subunits 1B and 1C. To minimize impacts to the Sierra Nevada yellow-legged frog we propose discouraging OSV use within Critical Habitat Subunits 1B and 1C. We support alternative 5 for this reason, as it increases the likelihood of maintaining populations of this federally Endangered species. <br> To reduce the incidence of trespass into the western portion of the Bucks Lake Wilderness and discourage OSV use in Critical Habitat Subunit 1B, we strongly recommend that the Forest Service stop grooming Primary Forest Route 33. The elimination of grooming on Forest Road 24N33, as shown on alternative 5 , would likely reduce OSV use on Cape, Mud, and Blue Lakes and lessen OSV impacts to the federally Endangered Sierra Nevada yellowlegged frog. | In response to items 1, 2, 3, 4, 7, and 8, thank you for your comments. <br> 5. The FEIS presents the project's regulatory framework (volume I pages 210217, volume II pages 23-62), issues, measures and direction (volume I pages 14-20); specifically discussing terrestrial (volume I page 162) and aquatic (volume I page 224) issues, resource indicators and measures (terrestrial volume I pages 163-164, aquatic volume I pages 221), analytical methods (terrestrial volume I pages 165-167, aquatic volume I pages 219-223), while evaluating direct, indirect and cumulative environmental consequences for each species and all alternatives (terrestrial volume I pages 169-209, aquatic volume I pages 243-261). The FEIS specifically discusses regulations, issues, indicators, and measures for aquatic resources including Sierra Nevada yellowlegged frogs, and both suitable and designated critical habitat for the species across all alternatives, (volume I pages xii-xiii, 17-18,24,47,61-63,88-89,162164,210,216,217,221,227,244; volume II page 61). Direct, indirect and cumulative impacts are analyzed and presented for all alternatives, including Forest Service System Road 24N33 (volume I pages 169,250-255,260; volume II pages 166-169,174-176,276-278,306-308). The FEIS also presents project's regulatory framework, issues, indicators and measures in relation to California spotted owls and their protected activity centers by each alternative (volume I page 61,163; volume II pages $47,53,55,58$ ), as well as applicable species ecology, analytical methods and direct, indirect and cumulative effects, including those for Forest Service System Road 24N33 (volume I pages 165$168,184,190,208,212,214$; volume II pages 166-174). The Forest Service follows applicable direction in proposing Forest Service Road 24N33 in the OSV FEIS, appropriately evaluates potential impacts to aquatic and terrestrial resources along 24N33, and proffers several alternatives specifically designed to protect Sierra Nevada yellow-legged frog suitable and designated critical habitat and California spotted owl protected activity centers. |


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| Hybrid Alternative - Bucks Lake Area (continued) | Not grooming Forest Road 24N33 would likely reduced OSV use in the vicinity of Bald Eagle and Bucks Mountains and minimize impacts at California Spotted Owl Protected Activity Centers. We support terminating OSV use north of the Quincy - Oroville Highway (Plumas County Road 414) between the intersection with the Silver Lake Road (24N29X) and Bucks Lake, as shown in alternative 2. <br> We strongly support that the Proposed Action has prohibited OSV use in the vicinity of eligible Wild Rivers - Bear Creek and the Little North Fork of the Middle Fork of the Feather River, as shown in alternative 2. We strongly support that the Proposed Action prohibits OSV use in existing and proposed Special Interest Areas in the Bucks Lake OSV use area - Butterfly Valley, Feather Falls, Fales Basin and Little Volcano. <br> 1. OSV use be prohibited below 5,000 feet in elevation; discourage OSV use within Sierra Nevada yellow-legged frog Critical Habitat Subunits 1B and 1C, we support alternative 5 for this reason, as it increases the likelihood of maintaining populations of this federally endangered species. <br> 2. Friends of Plumas Wilderness supports terminating OSV use north of the Quincy Oroville Highway (Plumas County Road 414) between the intersection with the Silver Lake Road (24N29X) and Bucks Lake, as shown in alternative 2. Eliminating OSV use in this narrow sliver of land will not reduce the quality of motorized winter recreation opportunities available in the area but will greatly reduce the occurrence of accidental trespass into the Bucks Lake Wilderness. | 6. The FEIS presents the project's regulatory framework, issues, and measures (volume I pages 14-20, 210-217, volume II pages 23-62) specifically discussing aquatic (volume I page 224) issues, resource indicators and measures (volume I pages 221), analytical methods (volume I pages 221-223), while evaluating direct, indirect and cumulative environmental consequences for each species and all alternatives (aquatic volume I pages 224-261). The FEIS specifically discusses regulations, issues, indicators, and measures for Sierra Nevada yellow-legged frogs, and both suitable and designated critical habitat for the species across all alternatives, (volume I pages xii-xiii,17-18,24,47,61-63,88-89,162-164,210,216,217,221,227,244; volume II page 61), including the Bucks Area (volume I pages 169,250-255,260; volume II pages 78-83), as well as for groomed and ungroomed trails proposed within the Bucks Area (volume II pages 167,169- <br> 170,1176,184,198,209,217,219,220,222,225,231,233,248,276-280,306,307308). The Forest Service follows applicable direction in proposing the Bucks Area in the OSV FEIS and appropriately evaluates potential impacts to aquatic resources including Sierra Nevada yellow-legged frog and its suitable and designated critical habitat. |


| Concern Category | Concern Statement | Concern Response |
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| Hybrid Alternative - Bucks Lake Area (continued) | 3. Friends of Plumas Wilderness supports the prohibition of OSV use in the Black Gulch area and in the vicinity of the Bucks Creek Loop Trail as shown in alternative 2. These areas receive very little OSV use and designating them as non-motorized will ensure the high-quality winter recreation opportunities available here today are protected into the future. <br> 4. Areas within the Bucks Lake OSV use area that Friends of Plumas Wilderness seeks Wilderness protections for include the Middle Fork of the Feather River and additions to the Bucks Lake Wilderness (Bucks Creek below Lower Bucks Lake and the Fales Basin / Rattlesnake Gulch area). These areas receive no or very little OSV use. Restricting OSVs from these areas would not reduce the quality of OSV recreation opportunities available and would protect their Wilderness qualities. For the Middle Fork Feather River, we recommend designating a no OSV use area as shown on 7.5-minute USGS maps provided to the Plumas National Forest, generally depicted in Alternative 5. <br> 5. Stop grooming Primary Forest Route 33 (Forest Road 24N33) to reduced impacts on Cape, Mud, and Blue Lakes and lessen OSV impacts to the federally Endangered Sierra Nevada yellow-legged frog, and likely reduced OSV use near Bald Eagle and Bucks Mountains and minimize impacts at California Spotted Owl Protected Activity Centers. |  |


| Concern Category | Concern Statement | Concern Response |
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| Hybrid Alternative - Bucks Lake Area (continued) | 6. To minimize impacts to Sierra Nevada yellow-legged frog critical habitat, we recommend no OSV use west of the Pipeline Road (24N34) and north of the Powerline Road (24N34), as shown on maps provided to the Plumas National Forest. In the Fales Basin / Rattlesnake Gulch area we recommend no OSV use north of 25 N59, west of 25 N17, 25 N20, and 25 N 20 K , as shown on maps provided to the Forest Service. <br> 7. Friends of Plumas Wilderness strongly supports that the Proposed Action has prohibited OSV use in the vicinity of eligible Wild Rivers - Bear Creek and the Little North Fork of the Middle Fork of the Feather River, as shown in alternative 2. <br> 8. We strongly support that the Proposed Action prohibits OSV use in existing and proposed Special Interest Areas in the Bucks Lake OSV use area - Butterfly Valley, Feather Falls, Fales Basin and Little Volcano. |  |


| Concern Category | Concern Statement | Concern Response |
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| Hybrid Alternative - Lakes Basin | The commenters support a hybrid alternative which incorporates components of alternative 2 and alternative 5 with additional modifications. <br> The final plan should not designate OSV use west of the Gold Lake Highway in the vicinity of the ski trails. Likewise, the Little Jamison Basin should not be designated for OSV use in order to protect Wades Lake, Jamison Lake, and Little Jamison Creek, an eligible Wild and Scenic River. See Attachment 4 for a map of our proposed modifications to this OSV use area. We are supportive of other elements of Alternative 2 for this area, including not designating McRae Meadow (a proposed SIA) for OSV use. <br> We support the prohibition of OSVs in the vicinity of Gold Lake where populations of Sierra Nevada yellow-legged frog occur, as shown in alternative 2. | Specific to the commenters proposed changes west of Gold Lake Highway in the vicinity of the ski trails, alternative 2 has been modified in the FEIS to restrict OSV around the non-motorized ski trail along Graeagle Creek to enhance non-motorized recreation opportunities along this trail. OSV use would be restricted from the trail to Gold Lake Highway, and to Graeagle Lodge. Prohibiting OSV use in the entire Jamison basin was analyzed under alternative 5, and the wild and scenic eligible Little Jamison Creek is not proposed for OSV use under alternative 2 of the FEIS. However, it would be a significant loss to OSV users if the area above Rock Lake under alternative 2 (around Wades and Jamison Lakes) became non-motorized, which OSV users have historically used. Motorized use occurs above Rock Lake, and much of the non-motorized use is below Rock Lake, thus alternative 2 in the FEIS strikes a balance between motorized and non-motorized uses in the Jamison Basin - the northern portion of Jamison basin would remain open to OSV use in alternative 2 of the FEIS, and in the southern portion of the Jamison Basin, OSV use would be prohibited. |
| Hybrid Alternative - Lakes Basin (continued) | We support Alternative 5 in the vicinity of Little Jamison Creek as it prohibits OSV use within the basin and would minimize impacts to Pacific marten. We strongly recommend prohibiting OSV use on McRae Ridge west of 23N08 to minimize human impacts on Pacific marten. <br> We strongly support prohibiting OSV use on Eureka Ridge within the proposed McRae Meadows SIA as shown in Alternative 2. We strongly recommend the Forest Service improve human-powered winter recreation opportunities in the Lakes Basin area by prohibiting OSVs west of the Gold Lake Highway and north of the Eagle Lake Lodge Road. |  |


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| Hybrid Alternative - Lake Davis Area | The commenter recommends a hybrid alternative which incorporates components of alternative 2 , alternative 5 , and an additional element. <br> In the vicinity of the Grizzly Peak Inventoried Roadless Area, we support Alternative 5 as it uses easily identifiable roads as no OSV boundaries rather than the Semi-Primitive Non-Motorized or IRA boundaries. We suggest prohibiting OSVs north of 24 N 08 X and east of 25 N 29 , as shown on 7.5-minute maps provided to the Forest Service. Designating the Grizzly Peak area as non-motorized will enhance humanpowered winter recreation opportunities in the Davis area. | Thank you for your comments. There is an elevational difference between alternatives 2 and 5 in the Rx-8 Semi-Primitive prescription near Grizzly Peak. Alternative 2 considered 3,500 feet, and alternative 5 considered 5,000 feet, which accounts for the difference in the OSV open area versus non-motorized area the commenter references. <br> The boundary of follows an easily identifiable topographic boundary on the ridge-line as proposed in both alternatives 2 and 5 . The roads proposed as a boundary by the commenter may not be discernable by users under snow, and limiting access to the road and ridge would potentially cause user conflict where it currently does not exist. <br> In response to a comment referring to promoting OSV use north of Portola, an OSV open area would be designated north of Portola under alternative 2, and it was analyzed in all other action alternatives. This OSV open area north of Portola will be shown on the OSV use-map (OSVUM). |
| Hybrid Alternative - Lake Davis Area (continued) | We strongly support prohibiting OSV use in the Brady's Camp proposed Special Interest Area and Soda Rock Geological SIA, as shown in Alternative 2. We support curtailing OSV use in the proposed Brady's Camp botanic SIA and encouraging OSV use in less sensitive areas, such as the 15 designated OSV trails west of Lake Davis shown in Alternative 2. We believe prohibiting off-trail OSV use west of Lake Davis will reduce impacts to sensitive vegetation and wildlife species found there. Promoting OSV use north of Portola would improve motorized winter recreation opportunities in the Davis area and provide economic stimulus for eastern Plumas County. |  |


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| Hybrid Alternative - Canyon Area | The commenter supports a hybrid alternative that incorporates components of alternative 2, alternative 5, and one new addition in the Canyon Area. <br> In the vicinity of the Chips Creek Inventoried Roadless Area, we support Alternative 5 as it protects Wilderness values in the IRA. We recommend a no OSV area west of 26N26 to the Plumas National Forest boundary. We recommend allowing OSV use in the vicinity of Ben Lomond, as the road to the peak is shown as an OHV route on the Plumas National Forest Motor Vehicle Use Map. <br> We support the protection of eligible Wild Rivers in the Canyon Area - Yellow and Squirrel Creeks, as shown in Alternative 2. We support the protection of unique botanical resources in the Canyon Area Red Hill and McNab Cypress proposed Special Interest Areas, as shown in Alternative 2. | In the Canyon OSV-use area, alternative 2 has been modified within the FEIS in the Chips Creek Semi-Primitive Area to exclude the Indian Springs area near the Lassen National Forest border and extend the non-motorized area of east of Yellow Creek to NFS Road 26N26. There are three areas near the Lassen National Forest border proposed in the FEIS as still open to OSV use (near Ben Lomond Peak, Chambers Peak and Tobin Ridges) to allow for continuity in motorized opportunities in those open OSV areas from the Lassen National Forest. |
| Use of Areas - Antelope (Non-Motorized) | Comments specific to Antelope Area provided by Friends of Plumas Wilderness. Comments express support for Alternative 2 that protects a mixture of ecological, cultural, and recreational resources. <br> Comments 75-9, 75-12: request to revise the boundary between the Antelope and Frenchman OSV use areas | Thank you for your comments in support of Alternative 2. There are natural topographic features between the Antelope and Frenchman OSV use areas that the Forest Service used to designate these boundaries. NFS Road 29N43 was proposed as the main boundary between these two areas because Indian Creek along NFS Road 29N43 provides a natural discreet boundary line for much of the boundary. The only locations OSV users can feasibly cross the creek along the majority of the boundary line is at Antelope Dam and Babcock Crossing. |


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| Frenchman Area - Friends of Plumas Wilderness | Proposed modifications in the Frenchman Area provided by Friends of Plumas Wilderness | In the Frenchman OSV use area, alternative 2 has been modified to prohibit OSV use in the entire Adams Peak IRA to protect non-motorized characteristics. Only a small portion of this area was open to OSV use in alternatives 2 and 5 in the DEIS, and these small areas would now be closed in alternative 2 of the FEIS. These areas have limited OSV access due to steep topography, therefore there would be minimal impacts on motorized opportunities. <br> In response to the commenter's request to redraw the boundaries of the Frenchman OSV use area, there are natural topographic features between the Antelope and Frenchman OSV use areas that the Forest Service used to designate these boundaries. NFS road 29N43 was proposed as the main boundary between these two areas because Indian Creek along NFS Road 29N43 provides a natural discreet boundary line for much of the boundary. The only locations OSV users can feasibly cross the creek along the majority of the boundary line is at Antelope Dam and Babcock Crossing. |
| La Porte Area | Comments specific to La Porte Area. <br> Friends of Plumas Wilderness recommends restricting OSV use below 5,000 feet in elevation. Doing so would minimize impacts to natural resources in areas that do not receive adequate snow for OSV use. Restricting OSV use below 5,000 feet would protect a portion of Sierra Nevada yellowlegged frog Critical Habitat Subunit 1D and minimize the likelihood of impacts to this federally Endangered species. The western portion of the Mount Fillmore proposed botanical SIA overlaps with Subunit 1D. Friends of Plumas Wilderness would like to see McRae Ridge designated as a no OSV area. McRae Ridge is within the Beartrap / West Yuba Inventoried Roadless Area and provides habitat for Pacific marten. | The commenter's recommendation of restricting OSV use below 5,000 feet in elevation was analyzed in the FEIS under alternatives 3 and 5 . Alternative 2 includes a 3,500-foot elevational limit, and alternative 4 has no elevation limit. The Travel Management Rule at 36 CFR 212.81(a) states, Over-snow vehicle use on National Forest System roads, on National Forest System trails, and in areas on National Forest System lands shall be designated by the Responsible Official on administrative units or Ranger Districts, or parts of administrative units or Ranger Districts, of the National Forest System where snowfall is adequate for that use to occur, and, if appropriate, shall be designated by class of vehicle and time of year. The process used by the Interdisciplinary team to identify an elevational restriction for OSV use in various alternatives is described in the FEIS in Chapter 2, Alternative Development. The 3,500-foot elevation was used as a screening tool to narrow the team's efforts to designated NFS lands most likely to receive snowfall in adequate amounts to support OSV use. We took into account observed conditions at various elevations across the Forest (frequency of snowfall, longevity, and quality of snow conditions) where snowfall is adequate for OSV use to occur (36 CFR 212.81(a)). |


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| La Porte Area (continued) | Friends of Plumas Wilderness supports modifying Alternative 5 in the La Porte area to maintain outstanding opportunities for solitude or a primitive and unconfined type of recreation by prohibiting OSV use in the Middle Fork IRA / citizen inventoried roadless area, Feather Falls IRA, Buzzards Roost Ridge citizen inventoried roadless area, and Beartrap / West Yuba IRA. <br> Additional areas where we would like to see OSV use curtailed include: Onion Valley Creek below Plumas County Road 511, McRae Ridge (also in the Lakes Basin OSV use area), and the area north of Poorman Creek which does not have roads. USGS 7.5-minute maps depicting these proposed roadless area boundaries have been submitted to Plumas National Forest staff. We support Alternative 2 as it relates to eligible Wild Rivers in the La Porte area because it minimizes motorized recreation impacts to eligible Wild Rivers by prohibiting OSV use within $1 / 4$-mile of the South Branch Feather River, Onion Valley Creek, McCarthy Creek, and Dixon Creek. We support Alternative 2 as it relates to Special Interest Areas in the La Porte area because it prohibits OSVs in the Valley Creek botanical SIA, Feather Falls scenic SIA, Bald Rock proposed geological SIA, Fowler Lake proposed botanical SIA, Mount Fillmore proposed botanical SIA, McRae Meadow proposed botanical SIA (described in the Lakes Basin OSV area). | Data from the National Weather Service's National Operational Hydrologic Remote Sensing Center <br> (https://www.nohrsc.noaa.gov/nsa/index.html?region=Sierra Nevada) were also used to evaluate snowpack trends on the Plumas National Forest. The team recognized the variation in snowpack conditions between low and high snowpack years (verified using the California Department of Water Resources Data Exchange Center, http://cdec.water.ca.gov/snowapp/swcchart.action). The existing groomed OSV trail networks in the Bucks Lake, Lakes Basin, and La Porte areas are located above 4,000 feet in elevation (Bucks Lake: 4,000 to 5,900 feet; Lakes Basin: 5,400 to 7,200 feet; and La Porte: 4,900 to 6,600 feet). Restricting OSV use below 5000 feet in elevation would eliminate some existing OSV staging areas, groomed trails, and open areas. When there is adequate snow, areas above 3,500 feet are used for over-snow recreation. Based on this information, areas above 3,500 feet in elevation have been selected for OSV use under alternative 2 of the FEIS. <br> As described in the FEIS, Appendix D, Mitigations to Address the Minimization Criteria in the Travel Regulations for Areas Designated for OSV Use, Sierra Nevada Yellow Legged Frog would be protected in the La Porte OSV designated use area, as OSV use would only be allowed in designated areas and on designated trails only when there is adequate snow depth to protect frogs and their habitats. Cross-country OSV travel in designated areas would be allowed only when there is 12 inches of snow or ice on the landscape. OSV use would not be designated across open or flowing water. In addition, in Critical Habitat for SNYLF, cross-country travel by OSVs would not be designated within 50 feet of flowing water. <br> For the La Porte designated OSV-use area under alternative 2, the area of Onion Valley that is west of Placer Diggings is adjacent to a groomed OSV route, and would likely invite conflict where it doesn't exist now if OSV use was prohibited in that area. Last Chance, Sawmill Tom, and Washington Creeks were already partially excluded from OSV use in the DEIS inside of the wild and scenic OSV closure of Middle Fork of the Feather River. The Buzzards Roost Ridge area would remain open to OSV use in the FEIS, as this area does not have a Roadless designation under the 2001 Roadless rule. The area west of Buzzards Roost Ridge (Dixon Creek) was already closed to OSV use in the DEIS because it is an eligible wild and scenic river. |


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| La Porte Area (continued) | We propose modifying Alternative 2 in the vicinity of the Lost Sierra Traverse. We would like to see OSV use restricted on McRae Ridge as it would enhance humanpowered winter recreation and would not detract from motorized winter recreation as the area sees little snowmobile use. We support Alternative 2 in the vicinity of the community of La Porte because it proposes the addition of a cross-country ski trail at Lexington Hill. <br> The area around Mt. Fillmore should not be closed using the reasons cited in the draft EIS. OSV use in this area has occurred for years without any impacts to botanical resources. And OSV use can only occur when there is sufficient snow depth to protect such resources going forward. Furthermore, cattle are actually allowed to graze in this area, which is certainly more impactful than OSV use would be. Finally, motorized use is already allowed in this area on routes 10 M 06 and 22N43, so OSV use in this area should be preserved. The East Nelson Creek area should also not be closed using the reasons cited in the draft EIS. OSV use can only occur when there is sufficient snow depth to protect aquatic resources. The north face of Beartrap Mountain should also not be closed because OSV use can only occur when there is sufficient snow depth to protect resources. The closure in the Fowler Lake area seems excessively large. While portions of this area are certainly too steep and difficult to access, OSV use can only occur when there is sufficient snow depth to protect resources in the areas that are not too steep to access. | For the areas the commenter is recommending OSV use are excluded, alternative 2 of the FEIS attempts to strike a balance between motorized and non-motorized uses. The Mt. Fillmore SIA is already excluded from OSV use under the FEIS under alternatives 2, 3, and 5. The 2001 Roadless Rule allows motorized recreation within Inventoried Roadless Areas (IRAs). The SemiPrimitive Area Prescription (Rx-8) in the Plumas LRMP and IRAs (RARE II) generally overlap. Under alternative 2 of the FEIS, OSV use is not proposed in the majority of these Rx-8 prescriptions the commenter refers to with the exception of Buzzards Roost Ridge citizen, which was not designated as an IRA in the 2001 Roadless Rule; however OSV use would not preclude future designation as wilderness. Onion Valley Creek below Plumas County Road 511 is an area that has existing OSV use and groomed trails, and would likely create conflict between users where it is not present now if OSV use was lost in that area. Alternative 2 has been modified to create a non-motorized corridor in the vicinity of the Lost Sierra Traverse from the PCT's intersection with NFS Road 22N82X, to McRae Ridge. This would both enhance non-motorized experiences and opportunities along this corridor, but also recognizes this historically used trail. <br> In response to comments in support of OSV use in the La Porte area- the Mt. Fillmore Special Interest Area (SIA), the Fowler Peak SIA, the Beartrap Semiprimitive area prescription (Rx-8), Nelson Creek, and the area around NFS Roads 22N43 and 10M06, all of these areas were analyzed under Alternative 4 as open to OSV use. Areas excluded under alternative 2 in the FEIS are a result of using the minimization criteria to identify which areas adequately protect natural and cultural resources, and provide for recreation. Alternative 2 strikes a balance between motorized and non-motorized opportunities. The Rx8 prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized dispersed recreation. |
| DEIS-General Comments Friends of Plumas Wilderness | General comments on the DEIS from Friends of Plumas Wilderness | No further action required. General comment. |


| Concern Category | Concern Statement | Concern Response |
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| Use of Areas - Bucks Lake | Recommendations for the use of Bucks Lake Area. | Based on public comments on the DEIS, alternative 2 in the FEIS includes adjustments to the proposed OSV designations in the Bucks Lake OSV area. The modifications include: <br> From Plumas County Road 414, designate and groom 24N33 to the intersection of 24N89X; continue grooming 24N89X to the intersection of 24N89XA. This leads users away from the Bucks Lake Wilderness boundary, provides a longer groomed OSV trail and a safe turn around location for the grooming machine. <br> Remove proposed designated OSV open areas west of Bucks Lake. Prohibit OSV use west of NFS road 24N24, and 24N35 and 24N25Y (considered two unique areas adjacent to one another), north of 24 N 34 . These areas receive little to no OSV use due to steep terrain and risk of avalanches. <br> Redraw proposed designated OSV open area in the Yellow Creek area of the Chips Creek Roadless area northwest of Bucks Lake Wilderness. Redraw open area to NFS road 26N26 and ridge above 26N26. Limiting the OSV open area to the ridge removes a steep slope that provides access to a creek. This is not a high use or value area for OSV use. <br> Remove proposed designated OSV open area north of Indian Creek in the Chips Creek Roadless area. Removing this small open area protects the semiprimitive nature of the Chips Creek Roadless area. <br> Designate open area on the west side of Meadow Valley, near NFS road 24N30A, along private land boundary, and include NFS road 24N29X (Silver Lake Road). This allows access from private land to NFS open areas allowing cross-country travel. |
| Use of Areas - McRae Meadows | In McRae Meadow, snowmobiles will not affect aquatic species, as access to the McRae Meadow area would require a significant base of snow, therefore snowmobile activity in the area would not affect water-bound wildlife. | Allowing OSV use in the McRae Meadows area was analyzed under Alternative 4. Areas excluded for OSV use under Alternative 2 were a result of using the minimization criteria to identify which areas adequately protect natural and cultural resources, and provide for both motorized and non-motorized recreation. Alternative 2 strikes a balance between motorized and nonmotorized opportunities, and adequate protection of natural and cultural resources. |


| Concern Category | Concern Statement | Concern Response |
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| Specific Areas and Trails Lake Davis | I don't think there should be any groomed trails at Lake Davis because once people are led to that area they would continue to ride around the Lake. The Lake Davis area is used by a small amount of snowmobilers and many skiers because it is easily accessible and relatively flat. There are excellent opportunities for skiers to use the Lake Davis hiking trail and not have to be on the road. This area could be an excellent area to promote cross country skiing, now and in the future. <br> The west side of Lake Davis (24N10) is closed. The open meadow areas around the lake are used by OSV to get to the frozen lake. Over the last 40 years, the bald eagle population around the lake has grown. OSV have not affected the eagles. The roads are "potentially open to OSV less than 50 ". But the DEIS does not explain what "potentially open" means, so it is impossible to comment on that. Grazing is allowed in these meadows with OHV and horses accessing the meadows in the summer, and that use does not affect the eagles either. The OSV map needs to show at the County Roads on the eastside of the lake are open to OSV. Davis OSV Area: We appreciate that Alternative 2 does not designate the west side of Davis Lake for OSV use, as it is popular with cross-country skiers. This will provide cross-country skiers and snowshoers with an opportunity to recreate in a non-motorized setting, while providing opportunities for OSV use on the east side of the lake as well as elsewhere in the Davis OSV Area. We support the proposed management in Alternative 2 for this OSV area. | In the Lake Davis area, Alternative 2 strikes a balance between motorized and non-motorized uses and protection of resources, including bald eagles. Groomed trails at Lake Davis were considered under Alternative 4. Alternative 2 and 5 proposed designation of trails at Lake Davis but not grooming. All other alternatives do not include designation of trails or grooming at Lake Davis. Minimization criteria was applied for bald eagle areas around Lake Davis, which resulted in designation of trails at Lake Davis, but not grooming under Alternatives 2 and 5 . <br> Alternative 2 has been modified from the DEIS, and the only trails that are designated, are ungroomed trails that allow OSV access to the lake, which include NFS Road 24N10, and five OSV trails (NFS Road 24N79Y, 24N10B, $24 N 71 \mathrm{Y}, 23 \mathrm{~N} 13 \mathrm{Y}$, and 23 N 10 Y ) that lead to the lake in the bald eagle closure area. The open area around Lake Davis is still maintained under alternative 2, which allows for cross-country OSV opportunities with the exception of the west side of the lake within the bald eagle closure area. The other roads in the Lake Davis area (on eastern and northern side of lake) are County roads, and they are plowed by Plumas County leading to the Lake Davis Motel and J and J Grizzly Store and Camping Resort. Chalet View Lodge is roughly on the other side of Hwy 70 from Lake Davis and lacks staging infrastructure, and is below 5,000 feet receiving inconsistent snow. <br> Although the selective alternative in the FEIS does not include groomed trails in the Lake Davis area, a groomed trail system at Lake Davis was analyzed under Alternative 4. If funding was acquired in the future from California State Parks OHVMR Division or other funding sources, a future environmental analysis could be done to designate groomed trails and build infrastructure. The Plumas National Forest Over-snow Vehicle Use Designation Project is not intended to be a comprehensive, holistic winter recreation planning effort. The decision resulting from this analysis would designate areas and trails for public OSV use in accordance with Subpart C on the Plumas National Forest. Development of new facilities such as new staging areas in the Lake Davis area are outside the scope of this project. This analysis is focused on the designation of OSV use and grooming of OSV trails. <br> Chapter 3. Affected Environment and Environmental Consequences, under the Terrestrial Wildlife Section, describes effects on bald eagles in various alternatives. |


| Concern Category | Concern Statement | Concern Response |
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| Specific Areas and Trails Lake Davis (continued) | The area around Lake Davis should not be closed using the reasons cited in the draft EIS. The Bald Eagle is listed a species of least concern and has been for over a decade. The Bald Eagle is thriving under existing OSV use. Instead, the Plumas should update its Forest Management Plan to reflect current regulations. <br> Black Gulch/Clear Creek A Another area of approximately 1,920 acres projected to be closed with this action. This action will further restrict the number of usable OSV recreational opportunity. This area is very popular as a motorized play area. There is no science to back up a rational for closure. Here again you will face much push back from the public Smith Peak/Lake Davis Trail System This area was originally on the winter recreation map and then ink just slid off on a new printing of the map. The Beckworth District told the public that it would be returned to the map but never did it. They have sense proposed to limit OSV use by Lake Davis citing Bald Eagle protection zones as part of their management plan. The Bald Eagle has been listed as a species of least concern for over a decade now and the PNF needs to issue a forest plan amendment to bring this out of date FMP up to date with current regulations and treat the area in accordance. There are services and accommodations very close with Lake Davis right there. While grooming is not available at this time having this system on the map and ready to go will encourage the State Parks OHMVR Division to look closer and push harder to find funding. This is an established system that will benefit from grooming when | Alternative 2 has been modified from the DEIS, and the only trails that are designated, are ungroomed trails that allow OSV access to the lake, which include NFS Road 24N10, and five OSV trails (NFS Road 24N79Y, 24N10B, 24N71Y, 23N13Y, and 23N10Y) that lead to the lake in the bald eagle closure area. The open area around Lake Davis is still maintained under alternative 2, which allows for cross-country OSV opportunities with the exception of the west side of the lake within the bald eagle closure area. The other roads in the Lake Davis area (on eastern and northern side of lake) are County roads, and they are plowed by Plumas County leading to the Lake Davis Motel and J and J Grizzly Store and Camping Resort. Chalet View Lodge is roughly on the other side of Hwy 70 from Lake Davis and lacks staging infrastructure, and is below 5,000 feet receiving inconsistent snow. <br> Although the selective alternative in the FEIS does not include groomed trails in the Lake Davis area, a groomed trail system at Lake Davis was analyzed under Alternative 4. If funding was acquired in the future from California State Parks OHVMR Division or other funding sources, a future environmental analysis could be done to designate groomed trails and build infrastructure. The Plumas National Forest Over-snow Vehicle Use Designation Project is not intended to be a comprehensive, holistic winter recreation planning effort. The decision resulting from this analysis would designate areas and trails for public OSV use in accordance with Subpart C on the Plumas National Forest. Development of new facilities such as new staging areas in the Lake Davis area are outside the scope of this project. This analysis is focused on the designation of OSV use and grooming of OSV trails. <br> Chapter 3. Affected Environment and Environmental Consequences, under the Terrestrial Wildlife Section, describes effects on bald eagles in various alternatives. |


| Concern Category | Concern Statement | Concern Response |
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| Specific Areas and Trails Lake Davis (continued) | available. The trail system needs to be brought around the south side of the lake to the store. This is where the services are and will keep people from riding on the county road. Working together with the public the FS should create a plan for development of a parking area, trail head and groomer shed in the area of the businesses at the lake. Growth in state population will likely continue to increase demand for access to winter recreation throughout the state's national forests. Based on projected growth levels in OSV use over the 10-year project period, it can be expected that there will be more demand placed on the state to expand its trail facilities. <br> The OSV Designation Project is a great Qpportunity to improve the economics of the Lake Davis area and the eastside of Plumas County, but the For~ Service has fallen short and has not shown consideration for local business. The Lake Davis area has severa1 businesses that depend on winter revenue from OSV users. It is essential that groomed trails connect to the Lake Davis Motel, and J and J Grizzly Store and Camping Resort, and the Chalet View Lodge. At least one snowmobile guide business operates on the trails in the Lake Davis area. It is critical to locate groomed trails to enhance and support all of these businesses. A parking area and groomer shed location at Lake Davis must be planned. Trail grooming at Lake Davis will have a positive effect on the local winter economy, as well as provide groomed trails for both motorized and nonmotorized users. In 2012 the PNF applied for and received an OSV Grant from the state to study the feasibility of OSV use in the Lake Davis area. |  |


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| Specific Areas and Trails Lake Davis (continued) | The main stated: objective to create an OSV area that would take pressure off the high use Lakes Basin area. The DEIS does not reflect this objective. The areas around the lake are closed to OSV and there is no analysis for a staging area or grooming shed, which were requested by the public at all tile workshops and public meetings regarding the Lake Davis winter plan. There was a designated OSV area map for Lake Davis for over a decade, but the PNF denied ever seeing the map. The Beckwourth District Ranger said it would be reprinted and distributed, but that never happened. Alf of $\sim$ e trails shown on this map below need to be designated as OSV trails, especially the Bagley Pass Road which should be shown as "potentially" groomed. <br> SEE SUBMISSION: Page 4 of 18, Map of Lake Davis Snowmobile Trails The public asked for these designations to be carried forward in the new OSV plan, but that request has been ignored. Bald Eagles are an issue at Lake Davis, as well as the Antelope Lake, and Frazier Falls areas. The Frazier Falls nest is displayed on the map as being an OSV restricted area but it is not shown on the LRMP map as an Rx-11. The FEIS must explain how that contradiction was resolved. There is no analysis of nonmotorized use for this nest or other nests at Lake Davis and Antelope Lake. The reason for the lack of analysis for nonmotorized: use must be disclosed in the FEIS. Lake Davis Solutions: 1. Designate cross country areas for OSV around the lake, except for within 600' of protected eagle nests. 2. Reanalyze the Lake Davis |  |


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| Specific Areas and Trails Lake Davis (continued) | area using public comments and the Plumas County proposal that were submitted during the OSV Feasibility Study. 3. Make a commitment to apply for State grant funding in 2020 for a parking lot, staging area, and groomer shed in the Lake Davis area. |  |
| Specific Areas and Trails Lakes Basin | I favor maintaining the important OSV corridor linkage between the Lakes Basin and La Porte OSV areas. I also favor the proposed no OSV ski/ snowshoe "corridor" connecting the lower Lakes Basin area over to the Johnsville area. <br> In regards to the controversial Little Jamison Creek basin, it is an existing PNF nonmotorized primitive area in non-snow seasons and I favor extending this designation making this a year-round nonmotorized area as opposed to "splitting it" as alternative 2 proposes. I have already noted the quality and historic value of skiing in this area. However, as part of the Lakes Basin to La Porte OSV corridor concept noted above, I think a possible "Florentine Canyon compromise" should be considered allowing OSV's in Florentine. OSV riders could travel approved Pacific Crest Trail corridor routes along Luther Ridge into both the "A Tree to upper Jamison Canyon Road" area as well as through Florentine Canyon maintaining the great OSV riding this drainage apparently offers. Alternative 2 does not currently allow OSV use in Florentine Canyon. Some snowmobilers say they don't see skiers in Little Jamison as has also been said about the historic ski basin of Onion Valley. Though some of us aren't as young as we used to | Alternative 2 has been modified in the FEIS to incorporate a non-motorized corridor along the PCT from southeast of Onion Valley to where the PCT is within the Semi-primitive Prescription ( $\mathrm{Rx}-8$ ). This results in a non-motorized corridor all the way to McRae Ridge. A widened area not designated for OSV use along the PCT both meets the nature and purpose of the trail, and recognizes historic uses of the trail as the 'Lost Sierra Ski Traverse.' Prohibiting OSV use in the entire Jamison basin was analyzed under alternative 5, and the Wild and Scenic eligible Little Jamison Creek is not proposed for OSV use under alternative 2. However, it would be a significant loss to motorized users if the area above Rock Lake under alternative 2 became nonmotorized, which OSV users have historically used. Motorized use occurs above Rock Lake, and much of the non-motorized use is below Rock Lake, thus alternative 2 in the FEIS strikes a balance between motorized and nonmotorized uses in the Jamison basin - the northern portion of Jamison basin would remain open to OSV use in alternative 2 of the FEIS, and in the southern portion of the Jamison basin, OSV use would be prohibited. <br> Alternative 2 has been modified in the area of Florentine Canyon and A Tree. Section 3 near A Tree is now designated as an OSV-use area, which allows for motorized use from the Tahoe into the Plumas and provides connectivity from NFS road 23N08 onto Plumas County Road 507. In order to provide high-value non-motorized opportunities in this area, alternative 2 removes the proposed designated open area in sections 29 and 32 near A Tree Campground in between McRae Ridge and NFS road 23N08, and immediately adjacent to the La Porte and Lakes Basin open area unit boundary. In addition, the open area designation in section 33 has been removed to provide contiguous areas not designated for OSV use within sections 32,33 , and 34 as this has high value to non-motorized users. Designation of NFS Road 23N08 maintains OSV access through the closed area from Lakes Basin to La Porte. |


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| Specific Areas and Trails Lakes Basin (continued) | be, I for one won't go to these places like I used to because of OSV's noise and other impacts including the amount of tracks powerful snowmobiles can put down in a short time. Granted, Onion Valley is a long way for most skiers to get to. Little Jamison Creek basin on the other hand is more skiersnowshoer accessible and a "logical" extension to the Plumas Eureka State Park, Johnsville area no OSV destination idea. <br> Splitting the basin as alternative 2 proposes is perhaps a compromise option but I favor compromise elsewhere. <br> Jamison Creek The Plumas is proposing to close the areas around Jamison, Rock and Grass Lakes due to the drainage being 'eligible for Wild and Scenic River designation'. The Wild and Scenic Rivers act was enacted as a response to the widespread massive dam construction occurring in America in the 50's and 60's. Not only does Jamison Lake have an impoundment (dam), this trickle of a seasonal creek is in no danger whatsoever of becoming the next big hydroelectric power project. Plumas management is abusing the spirit of the act, and OSV use does not threaten the wild or scenic character of Jamison Creek. <br> Along the Gold Lake Road, the areas in section 20 and 21, in the Goose and Haven Lake areas is a popular OSV destination and must be kept open. <br> As noted in previous comments, conflict has not been noted in the Smith Lake Basin and NE flank of Mt. Elwell and should remain open to OSV users. | In response to comments that are in favor of motorized uses in additional areas of the Lakes Basin open area, Alternative 4 was analyzed in the FEIS which allows maximum OSV use along the entire Little Jamison Creek Basin. However, Little Jamison Creek is an eligible Wild and Scenic River, and under the Plumas LRMP Wild and Scenic River interim guidelines, activities within 0.25 mile of each bank of an eligible reach of a river or stream will be managed consistent with the direction for Wild and Scenic Rivers until eligibility and river classification is determined. As described in Chapter 3 of the FEIS, Recreation section, Environmental Consequences, Alternative 4, there are potential impacts to outstanding values and primitive recreation settings where OSV use would occur along Little Jamison Creek. Alternative 2 strikes a balance between providing for both motorized and non-motorized opportunities and designates the upper (south) portion of Little Jamison Creek Basin for OSV use. The lower (north) portion of Little Jamison Creek Basin would not be designated for to OSV use. <br> Alternative 2 has been modified in the FEIS along the PCT where there are existing groomed OSV trails or numerous summer roads, a 500 -foot buffer was removed in alternative 2 of the FEIS. In consideration of maintaining the nature and purpose of the trail and non-motorized recreation settings, alternative 2 would not designate OSV use along the PCT where it is most practical and feasible to enhance non-motorized experiences, such as in the area south of Bucks Summit, and the area along the PCT near Onion Valley to A-tree. Alternative 4 analyzes designation of OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). |


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| Specific Areas and Trails - <br> Lakes Basin (continued) | The closure of the Upper Jamison drainage is in direct violation of the Purpose and Need, which is to effectively manage "high quality, public OSV access". Lakes Basin is by far the most popular OSV area on the PNF. Access to other popular OSV destinations adjacent to Lakes Basin and to La Porte is essential to OSV users. A PNF official said the Jamison drainage is eligible for Wild and Scenic River status. However, the agreement with two appellants of the 1988 LRMP states only the area within $1 / 4$ mile of the drainage would be managed as Wild and Scenic. So the entire -area is -not required to be closed, and should remain open due to it's importance to OSV users. Lakes Basin Solutions: 1. As a compromise, designated upper Jamison drainage open for OSV use, and manage the area between Rock Lake and Plumas Eureka State Park as nonmotorized-for quiet recreation. There is a natural cliff barrier just north of Rock Lake, which is an easily recognizable boundary. This line needs to continue north to Mount Washington .and continue to the park boundary and follow it to County Road 507 east to FS23N08. This compromise would allow historical OSV access between La Porte and tales Basin, white expanding the nonmotorized use of the state park. 2. Do not approve the proposed PCT buffer. The Tahoe and Lassen NF did not approve the PCT buffer on their forest. Since the PCT runs along the boundary of the Tahoe and Plumas NFs for several miles, if the buffer is approved on the PNF there would be a buffer on one side of the PCT but not on the other side. There must be consistency between forests. |  |


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| $\begin{array}{l}\text { Specific Areas and Trails - La } \\ \text { Porte Area }\end{array}$ | $\begin{array}{l}\text { The snow level in La Porte varies from } \\ \text { winter to winter. Many years we have an } \\ \text { abundance of snow. We do not see people } \\ \text { using cross-county skiing, snowshoes, and } \\ \text { there is no downhill skiing. }\end{array}$ | $\begin{array}{l}\text { Existing groomed trails in the La Porte area would continue to be allowed under } \\ \text { all alternatives. There is minimal change to OSV use in the La Porte area under } \\ \text { alternative 2, with the exception of south of NFS Road 22N82X to Pilot Peak, } \\ \text { and along the PCT a non-motorized area is applied to protect non-motorized } \\ \text { opportunities and historic backcountry skiing in that area. }\end{array}$ |
| The preamble to the Multiple-Use Sustained-Yield Act of 1960 states, " An act |  |  |
| to authorize and direct that the national forests be managed under principles of |  |  |
| multiple use and to produce a sustained yield of products and services, and for |  |  |
| other purposes" . Under the multiple-use principle the Forest Service manages |  |  |
| winter uses to protect National Forest System (NFS) resources and to provide a |  |  |
| range of opportunities for motorized and non-motorized recreation. National |  |  |
| Forests should provide access for both motorized and non-motorized uses in a |  |  |
| manner that is environmentally sustainable over the long term. The National |  |  |\(\left.\} \begin{array}{ll}Forest System (NFS) lands are not reserved for the exclusive use of any one <br>

group, nor must every use be accommodated on every acre. It is entirely\end{array}\right\}\)

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| Challenge Experimental Forest | We are unable to identify any basis for closure of the Challenge Experimental Forest to OSV travel, as the RMP specifically only closes the area to ORV travel and not OSV travel. If the area were to be closed to OSV, in contradiction to the RMP, provisions should be included in this plan that allows for research using OSV travel within the Challenge Experimental Forest. | The Challenge Experimental Forest is a designated area established for research purposes. The 1988 Plumas Forest Plan developed a prescription specific to the Challenge Experimental Forest, including general direction and standards and guidelines (USDA Forest Service 1988, pp.4-78-4-79). Crosscountry OSV use is prohibited within the designated boundary area of the Challenge Experimental Forest, as general direction encourages only recreation that is compatible with Pacific Southwest Research Station (PSW) projects within the experimental forest. The prohibition of motorized vehicles in the Challenge Experimental Forest is to provide controlled conditions for experimental work. Given that the experimental forest is on the western boundary of the Plumas National Forest representing the lowest elevation closest to the foothills that doesn't align with high quality OSV areas with adequate snowfall, surrounded by private land to the west and south, and represents only 0.03 percent of NFS lands within the Plumas Forest that could be made available for cross-country OSV use, the Forest Supervisor did not believe it would be feasible to designate this area, hence will not pursue a plan amendment to allow cross-country OSV use within the Challenge Experimental Forest. |
| Routes on Private Property | Commenter advocates for designation of routes across private property. | OSV use designations do not apply to private lands. <br> Trail mileages are estimates only and we are currently reviewing the status of trails where there is uncertainty regarding Forest Service jurisdiction or grooming authorization, such as trails located on private property, or county roads that groomed trails have historically passed through. <br> Over-snow vehicle use that is specifically authorized under a written authorization issued under Federal law or regulations is exempt from subpart C designations (36 CFR Part 261.14(e)). The granting or maintenance of such access is outside the scope of the purpose and need for action, which is to provide a designated system of areas and trails for motorized over-snow vehicle use within the Plumas National Forest that is consistent with and achieves the purposes of the Forest Service Travel Management Rule at 36 CFR Part 212, subpart C. Therefore this feature will not be included in Alternative 3 to be analyzed in detail. Under the scope of this project, the Forest Service would only designate trails and areas under subpart C of the Travel Management Rule that are available for public use. Therefore, designating routes specifically for access to private lands, and not for public use, would not fall within the scope of this analysis or subpart C of the Travel Management Rule. <br> National Forest system roads under Forest Service jurisdiction with public right-of-way would be available for OSV use and were considered when developing alternatives. |


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| User Conflicts - General (OSV vs. Non-Motorized) | General comments from the non-motorized viewpoint about user conflict. | The preamble to the Multiple-Use Sustained-Yield Act of 1960 states, "An act to authorize and direct that the national forests be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes". Under the multiple-use principle the Forest Service manages winter uses to protect National Forest System (NFS) resources and to provide a range of opportunities for motorized and non-motorized recreation. National Forests should provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. The National Forest System (NFS) lands are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the NFS lands to provide different opportunities for recreation. <br> The criteria for designation of roads, trails, and areas for OSV use in the Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts (36 CFR 212.55 (b) and 212.81 (d)). Though some commenters believe that motorized and non-motorized forms of over-snow recreation are compatible, other commenters strongly believe that the two forms of winter recreation are conflicting and incompatible. <br> Conflicts can be present without direct physical encounters, and may be occurring without the knowledge of the party causing the conflict. Not everyone sees conflicts in the same way. Non-motorized recreationists can choose to use the OSV designated areas if they are not concerned about conflicts. <br> Minimization criteria and issues other than or in addition to user conflicts were factors considered when determining which areas to designate or not designate for OSV use in each alternative. <br> Six alternatives were developed that provide a range in the size and locations of OSV designated areas and trails. The differences in resource and social effects between the alternatives will be considered by the responsible official in the decision-making process. The indicators, measures, and methodology regarding the analyses for motorized and non-motorized recreation opportunities, including user conflicts was disclosed in the FEIS (page 14-16) and elaborated on throughout the Recreation and Noise sections of the FEIS in Chapter 3. |


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| User Conflict - General (OSV Viewpoint) | General comments about user conflict, most comments note that there is little conflict, except possibly at staging areas. | The preamble to the Multiple-Use Sustained-Yield Act of 1960 states, "An act to authorize and direct that the national forests be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes". Under the multiple-use principle the Forest Service manages winter uses to protect National Forest System (NFS) resources and to provide a range of opportunities for motorized and non-motorized recreation. National Forests should provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. The National Forest System (NFS) lands are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the NFS lands to provide different opportunities for recreation. <br> The criteria for designation of roads, trails, and areas for OSV use in the Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts (36 CFR $212.55(\mathrm{~b})$ and $212.81(\mathrm{~d})$ ). Though some commenters believe that motorized and non-motorized forms of over-snow recreation are compatible, other commenters strongly believe that the two forms of winter recreation are conflicting and incompatible. <br> Conflicts can be present without direct physical encounters, and may be occurring without the knowledge of the party causing the conflict. Not everyone sees conflicts in the same way. Non-motorized recreationists can choose to use the OSV designated areas if they are not concerned about conflicts. Minimization criteria and issues other than or in addition to user conflicts were factors considered when determining which areas to designate or not designate for OSV use in each alternative. <br> Six alternatives were developed that provide a range in the size and locations of OSV designated areas and trails. The differences in resource and social effects between the alternatives will be considered by the responsible official in the decision-making process. The indicators, measures, and methodology regarding the analyses for motorized and non-motorized recreation opportunities, including user conflicts was disclosed in the FEIS (page 14-20) and elaborated on throughout the Recreation and Noise sections of the FEIS in Chapter 3. |


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| User Conflicts (OSV vs. NonMotorized) - Specific | Commenters with specific recommendation for OSV Use Designation to avoid User Conflicts. Nothing submitted with the letter supports that there is conflict in these areas, so the recommendations are not provided in context of actual conflicts. The submitter is Winter Wildlands Alliance. <br> The recommendations are as follows: We endorse Alternative 2 for the Antelope and Davis OSV Areas. <br> * For the Bucks OSV Area, we endorse Alternative 2 with the following improvements: do not designate the following areas for OSV use: west of Pipeline Road (24N24); 24N35 and 24N25Y; the area west of 23N19 near Lookout Rock; and do not permit grooming on road 24 N 33 <br> * For the Canyon OSV Area, we endorse Alternative 2 with the following improvements: do not designate the following areas for OSV use: west of the Chips Creek roadless area to the PNF boundary (except at Ben Lomond) and the area west of 26N26 to Yellow Creek. <br> * For the Frenchman OSV Area, we endorse Alternative 2 with the following improvement: do not designate lands to the east of the Adams Peak roadless area for OSV use. <br> * For the Lakes Basin OSV Area, we endorse Alternative 2 with the following improvements: do not designate OSV use west of the Gold Lake Highway in the vicinity of the Lakes Basin and Graeagle Creek ski trails; do not designate the Little Jamison Basin. | Thank you for your comments and recommendations regarding minimizing conflicts between users. For the Bucks designated OSV use Area, Alternative 2 has been modified in the FEIS to incorporate additional areas restricted to OSV use which would both help to minimize conflicts, as well as provide high value non-motorized opportunities. Alternative 2 excludes OSV use to the area west of Three Lakes Road (FS Road 24N24) to Bucks Creek, and south to FS Road 24N34. Prohibiting OSV use in the area around Lookout Rock was analyzed under Alternative 5 of the FEIS; however, prohibiting OSV use in this area would likely create conflict since there are numerous groomed trails and existing OSV use in the area surrounding Lookout Rock. <br> Existing Forest Service groomed snowmobile trails in the Bucks designated OSV area are shown in A Guide to Bucks Lake Snowmobile Trails, (USDA 2009). This map illustrates that the Forest Service currently grooms to Chuck's Rock, located on NFS Road 24N33, and the map shows a designated ungroomed trail leading to Bald Eagle Mountain. OSV use is already occurring in the area of Bald Eagle Mountain off of NFS Road 24N33, and reducing this established groomed network would not be beneficial to OSV users, nor help minimize conflicts between users. A safe turnaround for grooming equipment is needed for all groomed trails. In order to accommodate a safe turnaround for grooming equipment on NFS Road 24N33, protect wilderness resources, and continue to provide for motorized use already occurring, Alternative 2 allows grooming on 24N33 beyond Chucks Rock to its intersection with NFS Roads 24N89X and 24N89XA. This will help ensure that motorized use is directed away from the wilderness, thus reducing conflicts between motorized and nonmotorized users, and continue to provide for established motorized use in the area. <br> In the Canyon designated OSV area, OSV use is an allowable use under the 1988 Plumas National Forest LRMP in the Chips Creek Inventoried Roadless Area, as well as the area west of 26N26 to Yellow Creek. The 2001 Roadless Rule allows motorized recreation within Inventoried Roadless Areas (IRAs). The Semi-Primitive Area Prescription ( $\mathrm{Rx} x-8$ ) in the Plumas LRMP and IRAs (RARE II) generally overlap with one another. Under Alternative 5 of the DEIS, no OSV was proposed in any of the Semi-Primitive Areas, including Chips Creek. Under Alternative 2 of the DEIS, OSV use was not proposed in the majority of the Semi-Primitive Area Prescriptions to protect semi-primitive and non-motorized characteristics. The modified alternative 2 excludes OSV use near the Lassen NF border at Indian Springs, Yellow Creek, and adjacent to 26N26 in order to protect semi-primitive and non-motorized characteristics. The commenter agrees with allowing OSV use near Ben Lomond Peak to allow for continuity in motorized opportunities in those areas from the Lassen NF. |


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| User Conflicts (OSV vs. NonMotorized) - Specific (continued) | * For the La Porte OSV Area, we endorse Alternative 2 with the following improvement: do not designate the portion of Onion Valley that is west of Placer Diggings, and do not designate Last Chance, Sawmill Tom, and Washington Creeks or the Buzzards Roost Ridge roadless area for OSV use. <br> * At a minimum, not designate OSV use within 500 feet of the centerline of the PCT. * OSV crossings of the PCT should correspond with the summer motorized route (MVUM) system where possible, be no wider than $1 / 8$ mile, and occur no more frequently than half-mile intervals. <br> * Locate OSV area boundaries in a manner that avoids the PCT and corresponds with obvious physical or topographical features. | In the Frenchman OSV use area, alternative 2 has been modified to prohibit OSV use in the entire Adams Peak IRA to protect non-motorized characteristics. Only a small portion of this area was open to OSV use in Alternatives 2 and 5 in the DEIS, and these small areas would now be closed in alternative 2 of the FEIS. These areas have limited OSV access due to steep topography, therefore there would be minimal impacts on motorized opportunities. <br> For the Lakes Basin designated OSV area, Alternative 2 has been modified in the FEIS to restrict OSV around the non-motorized ski trail along Graeagle Creek to enhance non-motorized recreation opportunities along this trail. OSV use would be restricted from the trail to Gold Lake Highway, and to Graeagle Lodge. Prohibiting OSV use in the entire Jamison basin was analyzed under Alternative 5, and the wild and scenic eligible Little Jamison Creek is not proposed for OSV use under alternative 2. However, it would be a significant loss to motorized users if the area above Rock Lake became non-motorized, which OSV users have historically used. Motorized use occurs above Rock Lake, and much of the non-motorized use is below Rock Lake, thus Alternative 2 in the FEIS strikes a balance between motorized and non-motorized uses in the Jamison Basin - the northern portion of Jamison basin would remain open to OSV use in alternative 2, and in the southern portion of the Jamison Basin, OSV use would be prohibited. <br> For the La Porte designated OSV use area under alternative 2, the portion of Onion Valley that is west of Placer Diggings is adjacent to a groomed OSV route, and would likely invite conflict where it doesn't exist now if OSV use was prohibited in that area. Last Chance, Sawmill Tom, and Washington Creeks were already partially excluded from OSV use in the DEIS inside of the wild and scenic OSV closure of Middle Fork of the Feather River, and the Middle Fork Semi-Primitive Area prescription (Rx-8). The Buzzards Roost Ridge area would remain open to OSV use in the FEIS, as this area does not have a Roadless designation under the 2001 Roadless rule. The area west of Buzzards Roost Ridge (Dixon Creek) was already closed to OSV use in the DEIS because it is an eligible wild and scenic river. |


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| User Conflicts (OSV vs. NonMotorized) - Specific (continued) |  | The National Trails System Act prohibits motorized use along national scenic trails. This is codified in 36 CFR 261.20 Pacific Crest National Scenic Trail; [49 FR 25450, June 21, 1984. Re-designated at 70 FR 68291, Nov. 9, 2005]). The Pacific Crest National Scenic Trail Comprehensive Plan (1982) affirms that snowmobiling along the trail is prohibited by the National Trail System Act (PL. 90-543, Section 7(c). To comply with this law, regulation, and the comprehensive plan, all action alternatives identify the Pacific Crest National Scenic Trail as not-designated for OSV use. In consideration of the maintaining the nature and purpose of the trail and non-motorized recreation settings, Alternative 2 has been modified in the FEIS and would not designate OSV use along the PCT where it is most practical and feasible to enhance non-motorized experiences, such as in the area south of Bucks Summit, and the area along the PCT near Onion Valley to A-tree. In other areas along the PCT where there are existing groomed OSV trails or numerous summer roads, a 500 -foot buffer was removed in alternative 2 of the FEIS. Alternative 5 would not designate OSV use within 500 feet of the PCT, Alternative 3 would designate OSV use within 500 feet of the PCT on 1,186 acres and Alternative 4 would designate OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). The proposed modifications in alternative 2 to "designate" or "not designate" the area for OSV use immediately adjacent to the Pacific Crest Trail addresses the 2005 Travel Management Regulation's minimization criteria requirements. Since this is a travel management planning process, there is no additional land management direction that would apply to the concept of a trail corridor associated with it. Future forest planning efforts would comply with FSH 1909.12 and would provide for the nature and purposes of the trail by also considering access, cultural and historic resources, recreational settings, scenic character, and valid existing rights. Comments from the Pacific Crest Trail Association have been received and considered through the public comment process associated with the DEIS and FEIS. <br> The FEIS analyzes a range of options for PCT crossings, the number varies by alternative: Alternative 2 proposes 16; Alternative 3: 9; Alternative 4: 31; <br> Alternative 5: 16. The analysis considers designating or not designating areas adjacent to the PCT for OSV use while protecting the non-motorized experience of the trail. The width and locations of these crossings in alternative 2 strikes a balance between providing access where there are already existing roads and providing necessary PCT crossings where OSV access is needed. |


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| User Conflicts - None Noted | Comments that state that there have been no observed user conflicts. Some comments indicate that contact is not conflict, and some state that it is not the job of the Forest Service to define conflict. <br> Comment A79-29 states: Non-motorized uses also "consume" untracked powder; suggestion to use Strava Heatmap for nonmotorized use trends. <br> Comment A143-6 states: motorized users can assist with backcountry emergencies Comment A161-11 states: Closure of areas where OSV use has historically occurred will create conflicts where none currently exist Comment A162-38 includes conflict literature citations. | The preamble to the Multiple-Use Sustained-Yield Act of 1960 states, "An act to authorize and direct that the national forests be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes". Under the multiple-use principle the Forest Service manages winter uses to protect National Forest System (NFS) resources and to provide a range of opportunities for motorized and non-motorized recreation. National Forests should provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. The National Forest System (NFS) lands are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the NFS lands to provide different opportunities for recreation. <br> The criteria for designation of roads, trails, and areas for OSV use in the Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts ( 36 CFR $212.55(\mathrm{~b})$ and $212.81(\mathrm{~d})$ ). Though some commenters believe that motorized and non-motorized forms of over-snow recreation are compatible, other commenters strongly believe that the two forms of winter recreation are conflicting and incompatible. <br> Conflicts can be present without direct physical encounters, and may be occurring without the knowledge of the party causing the conflict. Not everyone sees conflicts in the same way. Non-motorized recreationists can choose to use the OSV designated areas if they are not concerned about conflicts. <br> Minimization criteria and issues other than or in addition to user conflicts were factors considered when determining which areas to designate or not designate for OSV use in each alternative. <br> Six alternatives were developed that provide a range in the size and locations of OSV designated areas and trails. The differences in resource and social effects between the alternatives will be considered by the responsible official in the decision-making process. The indicators, measures, and methodology regarding the analyses for user conflicts was disclosed in the FEIS (volume I pages 15-16, Minimization criteria 3 on page 25, 86-88 and Issue 1b. Availability of Non-motorized Winter Recreation Opportunities c) Increasing the area of overlap between non-motorized (e.g., snowshoeing, cross-country skiing, general snow play) and motorized (i.e., OSV) use; is considered for each alternative in the Recreation section of FEIS in Chapter 3. The review of minimization criteria for each area and trail is documented in the FEIS volume II appendices D and E . |


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| Adequate Snow Depth Definition | Commenters contend that the use of snow depth and elevation are not reasonable indicators of adequate snow to protect resources, but rather, that many other factors should be considered when determining if OSV travel should be permitted on trails or in specific areas. Commenters prefer that this requirement be described in terms of the condition of the snowpack rather than its' depth or elevation. | The 3,500-foot elevation was used as a screening tool to narrow our efforts to NFS lands most likely to receive snowfall in adequate amounts to support OSV use. We took into account observed conditions at various elevations across the Forest (frequency of snowfall, longevity, and quality of snow conditions) where snowfall is adequate for OSV use to occur (36 CFR 212.81(a)). A complete description of how the elevation range was considered during development of alternatives can be found in the FEIS pages 21-22. Alternative 2 considers designating areas above 3,500 feet, Alternatives 3 and 5 consider designating areas above 5,000 feet, and Alternative 4 relies on snow depth, rather than a specific elevation for OSV designation. Similarly, snow depth considerations are included in the FEIS pages 22-23. <br> Effectiveness and Compliance monitoring and Enforcement is outlined in the FEIS pages 35-37. Monitoring would cover both snow depth and resource conditions, while enforcement actions (including education, warnings, and citations) would consider multiple factors including OSV designations, snow depth, and the occurrence of resource damage. <br> Many factors, in addition to elevation and snow depth, were used during development of the alternatives to consider areas and trails for designation for OSV use. This process is described in the FEIS page 23, Applying the Minimization Criteria and Other Specific Designation Criteria, and Table 7: Specific (and minimization) criteria (areas and trails proposed for designation for OSV use). |
| Adequate Snow Depth - Lack Best Available Science | The commenters contend that the Forest Service did not utilize the best available science in determining snow depth minimums. Some feel that they are inflexible and do not correlate with adequate snowfall. Further, the commenters indicate that the current science suggests that there is little or no science to support a universal snow depth for protecting multiple resources. | Snow depth considerations used during alternative development for the FEIS are described on pages 22-23 of the FEIS. The Forest Service uses best available scientific information in environmental analysis and decision-making. The Plumas National Forest Over-Snow Vehicle Use Designation Project FEIS (page xii) identifies potential impacts from OSV use on terrestrial and aquatic wildlife and botanical resources as significant issues. Impacts on these resources are related to various snowpack conditions, including snow depth. The action alternatives consider various snow depths to minimize impacts to forest resources. |


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| Adequate Snow Depth - Lack Best Available Science (continued) | The commenters contend that the Forest Service did not utilize the best available science in determining snow depth minimums. Some feel that they are inflexible and do not correlate with adequate snowfall. Further, the commenters indicate that the current science suggests that there is little or no science to support a universal snow depth for protecting multiple resources. | Snow depth varies by the alternatives analyzed in detail in the FEIS. Some of the alternatives include requirements and others include guidelines to avoid damage to underlying resources. Alternative 1, No Action correctly states: The Forest Plan does not establish a minimum snow depth for trail or cross-country public OSV use. The Forest Plan does not provide specific management direction for OSV trail grooming activities; however, the Forest follows the California State Parks' Off-Highway Motor Vehicle Recreation Division snow depth standard for grooming, which is currently 12 to 18 inches of snow (FEIS volume I page 29). Alternative 2 would impose a snow depth on trails that is adequate to avoid resource damage to natural and cultural resources (FEIS volume I page 30) and a 12 -inch snow depth for cross-country OSV use. Alternative 3 includes an 18 inch snow depth for both trails and cross-country use, Alternative 4 would not impose a snow depth on trails, but would require 12 inches for cross-country use, Alternative 5 would require 12 inches for trails and 24 inches for cross-country use. <br> Best available science related to snow depth is used in analyzing the effects of the alternatives on affected resources, including water and soil resources, terrestrial wildlife habitat, and aquatic wildlife species. In general, a greater snow depth reduces the risk of OSV use adversely impacting resources under the snow. The current scientific literature does not provide a definitive answer for establishing specific snow depth thresholds at which impacts to various resources will occur. However, one can assume a relationship between snow depth and risk of adverse impacts: the risk of adverse impacts generally increases as snow depth decreases. <br> Compliance monitoring and Enforcement is outlined in the FEIS page 37. Monitoring would cover both snow depth and resource conditions, while enforcement actions (including education, warnings, and citations) would consider multiple factors including OSV designations, snow depth, and the occurrence of resource damage. |
| Adequate Snow Depth Inadequate Analysis | Snowmobile technology has outpaced the Forest Service ability to analyze current technologies. An adequate snow analysis must include current science and valid research including: <br> 1. Snow Compaction <br> 2. Density <br> 3. Temperatures <br> 4. Aspect <br> 5. Time <br> 6. Location | Best available science related to snow depth is used in analyzing the effects of the alternatives on affected resources, including water and soil resources, terrestrial wildlife habitat, and aquatic wildlife species. In general, a greater snow depth reduces the risk of OSV use adversely impacting resources under the snow. The current scientific literature does not provide a definitive answer for establishing specific snow depth thresholds at which impacts to various resources will occur. However, one can assume a relationship between snow depth and risk of adverse impacts: the risk of adverse impacts generally increases as snow depth decreases. |


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| Adequate Snow Depth Inadequate Analysis (continued) | Current snowmobile design and technology affect "adequate snow" needs including: <br> 1. Reduced emissions standards <br> 2. Smokeless synthetic oils - Sweet smelling oils <br> 3. Reduced noise <br> 4. Reduced overall weight <br> 5. Reduced pounds per /inch <br> 6.Reduced bulk head angle - Major improvement to "float" on top <br> 7. Wide skis - Major improvement to "float" a snowmobile <br> 8. Plastic skis - Major change to "float" and ski design. <br> 9. Longer tracks -Huge change to "float" = major reduction in compaction. <br> Items 4-9 all add to floatation and reduced needed snow depths and need to be analyzed by site specific analysis which must address current standards AND snowmobile technologies. Please provide accurate and specific research supporting the inclusion of a 12 inch snow depth restriction. This analysis must include all of the above items. Unless specific research can support the 12 inch snow depth restriction, the Forest Service must remove this requirement. With this change, the Forest Service should then proceed with a specific definition of "visible damage". FS needs to define "visible damage" that law enforcement as well as the snowmobiler can understand. By removing the 12 inch snow depth restriction and going with a visible damage definition, this will now meet the requirement of defining "adequate snow". | Compliance monitoring and Enforcement is outlined in the FEIS page 37. Monitoring would cover both snow depth and resource conditions, while enforcement actions (including education, warnings, and citations) would consider multiple factors including OSV designations, snow depth, and the occurrence of resource damage. <br> Observation of impacts that would constitute resource damage are included in the Effectiveness Monitoring section beginning on page 35 of the FEIS. |


| Concern Category | Concern Statement | Concern Response |
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| Adequate Snowfall Elevation Criterion | The commenter suggests that the FEIS include a clear provision to adjust the elevation criterion, as needed, to accommodate the possibility that increased temperatures and changes in precipitation could alter the minimum elevation at which adequate snowfall occurs. | The process used by the Interdisciplinary team to identify an elevational restriction for OSV use in various alternatives is described in the FEIS in Chapter 2, under Alternative Development. The 3,500-foot elevation was used as a screening tool to narrow our efforts to NFS lands most likely to receive snowfall in adequate amounts to support OSV use. We took into account observed conditions at various elevations across the Forest (frequency of snowfall, longevity, and quality of snow conditions) where snowfall is adequate for OSV use to occur (36 CFR 212.81(a)). A complete description of how the elevation range was considered during development of alternatives can be found in the FEIS in Chapter 2, under Alternative Development. Alternative 2 proposes designating areas above 3,500 feet, Alternatives 3 and 5 propose designating areas above 5,000 feet, and Alternative 4 relies on snow depth, rather than a specific elevation for OSV designation. All action alternatives of the FEIS also propose implementation of a minimum snow depth requirement which also address the commenters concerns of adequate snowfall related to climate change. OSV use is not authorized in areas where snow does not meet minimum requirements. <br> Subpart C of the Travel Management Regulations require that designated public OSV areas and trails shall be identified on a publicly available OSV-use map (OSVUM)[(36 CFR 212.81(c)]. Once issued, designations would be made enforceable under 36 CFR 261.14, which prohibits the possession or operation of an OSV on NFS lands other than in accordance with the Subpart designations, subject to the exceptions listed at 36 CFR 261.14(a-f). (FEIS Chapter 1, Travel Management Regulations). |
| Adequate Snowfall | To ensure minimization of adverse impacts to various resources, designation of areas and routes for OSV use should only occur where snowfall is adequate, as required by Subpart C of the Travel Management Rule, the Forest Service should not designate any areas below 5,000 feet elevation for use by OSVs. Areas below 5,000 feet do not receive sufficient snowfall to protect the underlying resources. | A 5,000-foot elevation restriction was analyzed under alternatives 3 and 5 . Alternative 2 considers designating areas above 3,500 feet. The process used by the Interdisciplinary team to identify an elevational restriction for OSV use in various alternatives is described in the FEIS in Chapter 2, under Alternative Development. The 3,500-foot elevation was used as a screening tool to narrow our efforts to NFS lands most likely to receive snowfall in adequate amounts to support OSV use. We took into account observed conditions at various elevations across the Forest (frequency of snowfall, longevity, and quality of snow conditions) where snowfall is adequate for OSV use to occur (36 CFR 212.81(a)). A complete description of how the elevation range was considered during development of alternatives can be found in the FEIS in Chapter 2, under Alternative Development. |


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| Adequate Snowfall <br> (continued) | To ensure minimization of adverse impacts <br> to various resources, designation of areas <br> and routes for OSV use should only occur | Subpart C of the Travel Management Regulations requires that designated <br> public OSV areas and trails shall be identified on a publicly available OSV-use <br> map (OSVUM)[(36 CFR 212.81 (c)]. Once issued, designations would be made <br> enforceable under 36 CFR 261.14, which prohibits the possession or operation |
|  | where snowfall is adequate, as required by <br> Subpart C of the Travel Management Rule, <br> the Forest Service should not designate any <br> of an OSV on NFS lands other than in accordance with the Subpart <br> designations, subject to the exceptions listed at 36 CFR 261.14(a-f). (FEIS |  |
|  | areas below 5,000 feet elevation for use by | Chapter 1, Travel Management Regulations). Areas that are designated for |
|  | OSVs. Areas below 5,000 feet do not <br> receive sufficient snowfall to protect the | OSV use in the preferred alternative (alternative 2) would not be open to OSV <br> use unless there is adequate snow, which would help ensure protection of |
| underlying resources. |  |  |


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| Snow Depth - 6-inch Min Trail (Support) | We are aware that often parking or trail head facilities are located in areas where there may be minimal snowfall but exceptional recreational opportunities remain for the snowmobile community in areas that are higher and colder and may have numerous feet of snow when compared to the parking area. We submit that adoption of the 6 -inch minimum for usage of roads and trails recognizes this situation and provides a quality recreational experience for winter users and protects resources. | Thank you for your support of the six inch snow depth requirement on trails that would allow OSV access to deeper snow levels in higher terrain. This is analyzed in the FEIS in Alternative 2. |
| OSV Concentration - Safety | General comments about OSV concentration and safety issues that could occur. | The analysis provides a comparison by alternative showing the acres that would be designated per OSV. <br> Having a clearly designated system of trails and OSV use areas and the subsequent production of the OSV use map would improve information available to the public about opportunities for OSV use. This would assist both motorized and non-motorized recreationists in selecting areas that meet their setting and experience preferences, and therefore, would minimize the potential for conflict (FEIS volume I page 103). <br> Alternative 4 considers designating mores acres for cross-country OSV use than under existing conditions. |
| Emergency Management | Closing these areas would adversely impact the ability of the Fire Dept. at Bucks, and other emergency management personnel to respond to the community they serve. Closing these area would be devastating for sick and injured people. | The Forest Service recognizes that activities conducted on National Forest Systems lands involve inherent risks. Forest Service Manual 2713.1 (Special Uses) states, "1. Inherent Risks. a. Engaging in most activities on National Forest System lands involves inherent risks. Swimming, boating, skiing, horseback riding, mountain climbing, and even hiking, camping, and picnicking involve inherent risks." Recreationists take on these risks when they are engaged in these type of activities. In the course of responding to an emergency, agencies would be exempted from the 36 CFR 261.14 prohibitions under exemption item b, "(b) Use of any fire, military, emergency, or law enforcement vehicle for emergency purposes." |
| Elevation - 5,000 ft. unreasonable | Comments that indicate an elevation of 5,000 feet is unreasonable. | No further action required. Position statement. |


| Concern Category | Concern Statement | Concern Response |
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| PCTA - Support Multiple Use | Comments from PCTA supporting multiple uses, and acknowledging that uses should not 'interfere' with nature and purposes of PCT. | Alternative 5 would not designated OSV use within 500 feet of the PCT, Alternative 3 would designate OSV use within 500 feet of the PCT on 1,186 acres, Alternative 4 would designate OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). Alternative 2 was modified for the FEIS. In the modified alternative, areas not designated for OSV use adjacent to the PCT would be applied at Bucks Summit, the eastern side of the Middle Fork Wild and Scenic River, and from the general area of Onion Valley to McRae Ridge. OSV use would be designated within 500 feet of centerline of the PCT on 1,717 acres of the PCT. <br> The proposed action to "designate" or "not designate" the area for OSV use immediately adjacent to the PCT addresses the 2005 Travel Management Regulation's minimization criteria requirements. Since this is a travel management planning process, there is no additional land management direction that would apply to the concept of a trail corridor associated with it. Future forest planning efforts would comply with FSH 1909.12 and would provide for the nature and purposes of the trail by also considering access, cultural and historic resources, recreational settings, scenic character, and valid existing rights. |
| PCT - Continue Current Management | Comments supports current PCT management in the Bridgeport Winter Recreation Area and requests similar management on the Plumas NF. | Similar to management of the PCT in the Bridgeport Winter Recreation Area, the Plumas National Forest Over-snow Vehicle designation FEIS proposes designated trails across the PCT (the number varies by alternative: Alt 2: 16; Alt 3: 9; Alt 4: 31; Alt 5: 16; Alt 6: 24), and the analysis considers designating or not designating areas adjacent to the PCT for OSV use. <br> Alternative 5 would not designated OSV use within 500 feet of the PCT, Alternative 3 would designate OSV use within 500 feet of the PCT on 1,186 acres, Alternative 4 would designate OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). Alternative 2 was modified for the FEIS. In the modified alternative, areas not designated for OSV use adjacent to the PCT would be applied at Bucks Summit, the eastern side of the Middle Fork Wild and Scenic River, and from the general area of Onion Valley to McRae Ridge. OSV use would be designated within 500 feet of centerline of the PCT on 1,717 acres of the PCT. <br> The proposed action to "designate" or "not designate" the area for OSV use immediately adjacent to the PCT addresses the 2005 Travel Management Regulation's minimization criteria requirements. Since this is a travel management planning process, there is no additional land management direction that would apply to the concept of a trail corridor associated with it. Future forest planning efforts would comply with FSH 1909.12 and would provide for the nature and purposes of the trail by also considering access, cultural and historic resources, recreational settings, scenic character, and valid existing rights. |


| Concern Category | Concern Statement | Concern Response |
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| PCT - Protection and Management | Commenters sought no motorized access and protection for the PCT as well as asking for coordination with the PCTA in consideration of OSV access. | The National Trails System Act prohibits motorized use along national scenic trails. This is codified in 36 CFR§ 261.20 Pacific Crest National Scenic Trail; [49 FR 25450, June 21, 1984. Re-designated at 70 FR 68291, Nov. 9, 2005]). The Pacific Crest National Scenic Trail Comprehensive Plan (1982) affirms that snowmobiling along the trail is prohibited by the National Trail System Act (PL. 90-543, Section 7(c). <br> To comply with this law, regulation, and the comprehensive plan, all action alternatives identify the Pacific Crest National Scenic Trail as not-designated for OSV use. <br> Alternative 5 would not designated OSV use within 500 feet of the PCT, Alternative 3 would designate OSV use within 500 feet of the PCT on 1,186 acres, Alternative 4 would designate OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). Alternative 2 was modified for the FEIS. In the modified alternative, areas not designated for OSV use adjacent to the PCT would be applied at Bucks Summit, the eastern side of the Middle Fork Wild and Scenic River, and from the general area of Onion Valley to McRae Ridge. OSV use would be designated within 500 feet of centerline of the PCT on 1,717 acres of the PCT. <br> The proposed action to "designate" or "not designate" the area for OSV use immediately adjacent to the PCT addresses the 2005 Travel Management Regulation's minimization criteria requirements. Since this is a travel management planning process, there is no additional land management direction that would apply to the concept of a trail corridor associated with it. Future forest planning efforts would comply with FSH 1909.12 and would provide for the nature and purposes of the trail by also considering access, cultural and historic resources, recreational settings, scenic character, and valid existing rights. <br> Comments from the Pacific Crest Trail Association have been received and considered through the public comment process associated with the DEIS and FEIS. |
| PCT - Non OSV Corridor | Motorized recreation immediately adjacent to PCT incompatible with intended PCT experience. | The National Trails System Act prohibits motorized use along national scenic trails. This is codified in 36 CFR§ 261.20 Pacific Crest National Scenic Trail; [49 FR 25450, June 21, 1984. Re-designated at 70 FR 68291, Nov. 9, 2005]). The Pacific Crest National Scenic Trail Comprehensive Plan (1982) affirms that snowmobiling along the trail is prohibited by the National Trail System Act (PL. 90-543, Section 7(c). <br> To comply with this law, regulation, and the comprehensive plan, all action alternatives identify the Pacific Crest National Scenic Trail as not-designated for OSV use. |


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| PCT - No OSV Effects due to Snow | Comments that indicate the PCT would not be affected by winter OSV use, as it would be covered in snow. Comments against designating buffers or crossing points for the PCT. | Winter through-use (traveling long segments, or the entire length of the trail) on the Pacific Crest National Scenic Trail is minimal and use conflicts have not been reported. Winter use of the PCT is expected to be primarily day trips, within in several miles of plowed trailheads, rather than long distance trekking. The Pacific Crest National Scenic Trail Comprehensive Plan notes that: Winter use (cross-country skiing and snowshoeing) should be accommodated where practical and feasible (page 21). <br> As noted in the FEIS page 136, Table 25 Summary of Resource Indicators and Measures for all action alternatives, there are 22.4 miles of the PCT available to non-motorized recreation enthusiasts within 5 -miles of plowed trailheads. These areas are free from motorized use and are easily accessible by nonmotorized visitors in a typical day trip. <br> Alternative 5 would not designated OSV use within 500 feet of the PCT, Alternative 3 would designate OSV use within 500 feet of the PCT on 1,186 acres, Alternative 4 would designate OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). Alternative 2 was modified for the FEIS. In the modified alternative, areas not designated for OSV use adjacent to the PCT would be applied at Bucks Summit, the eastern side of the Middle Fork Wild and Scenic River, and from the general area of Onion Valley to McRae Ridge. OSV use would be designated within 500 feet of centerline of the PCT on 1,717 acres of the PCT. <br> The proposed action to "designate" or "not designate" the area for OSV use immediately adjacent to the PCT addresses the 2005 Travel Management Regulation's minimization criteria requirements. Since this is a travel management planning process, there is no additional land management direction that would apply to the concept of a trail corridor associated with it. Future forest planning efforts would comply with FSH 1909.12 and would provide for the nature and purposes of the trail by also considering access, cultural and historic resources, recreational settings, scenic character, and valid existing rights. |


| Concern Category | Concern Statement | Concern Response |
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| PCT - Management Plan Winter Use | Commenters suggest the current PCT Management Plan requires that the trail be managed for winter quiet recreation only where it is signed and managed for winter use. Currently this is not done on the Plumas, so a non-motorized buffer or designated crossings are inconsistent with the PCT Management Plan. Comments express the concern that crossings would be difficult to locate, and pose safety concerns with changing conditions. | The Pacific Crest National Scenic Trail Comprehensive Management Plan (1982) affirms that snowmobiling along the trail is prohibited by the National Trail System Act (PL. 90-543, Section 7(c). The comprehensive plan specifically addresses winter use as follows: <br> Snowmobiling on the trail is prohibited but crossing at designated locations is consistent with the purpose of the trail when such use is permitted on lands adjacent to the trail and does not cause damage to the trail, related resources, or facilities. (page 17). <br> Winter sports plans for areas through which the trail passes should consider this prohibition in determining areas appropriate for snowmobile use. Winter sports brochures should indicate designated snowmobile crossing of the Pacific Crest Trail where it is signed and marked for winter use. If cross-country skiing and/or snowshoeing are planned for the trail, any motorized use of adjacent land should be zoned to mitigate the noise of conflict (DFEIS volume I page 94 and PCT comprehensive plan, page 21). <br> The PCT comprehensive plan includes assumptions that were used in evaluation of alternatives during development of the plan. It notes that: <br> The intent of Congress in prohibiting motorized use of the trail, as expressed in the Hearing documents, reference (S. 827 and H.R. 4866), was to eliminate the safety and noise conflict with hikers and equestrians. Crossing the trail right-ofway by snowmobiles would not be in conflict with the intent of Congress if such use were part of a winter sports plan that permitted snowmobiles to use the land adjacent to the trail (page 23). <br> Management of National Scenic Trails (NST) provide for the conservation and enjoyment of significant scenic, historic, natural, or cultural qualities. Other uses along the trail, which would not substantially interfere with the nature and purposes of the trail, may be permitted. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established. (National Trail System Act, P.L. 90-543). |


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| PCT - Management Plan Winter Use | Commenters suggest the current PCT Management Plan requires that the trail be managed for winter quiet recreation only where it is signed and managed for winter use. Currently this is not done on the Plumas, so a non-motorized buffer or designated crossings are inconsistent with the PCT Management Plan. Comments express the concern that crossings would be difficult to locate, and pose safety concerns with changing conditions. | Alternative 5 would not designated OSV use within 500 feet of the PCT, Alternative 3 would designate OSV use within 500 feet of the PCT on 1,186 acres, Alternative 4 would designate OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). Alternative 2 was modified for the FEIS. In the modified alternative, areas not designated for OSV use adjacent to the PCT would be applied at Bucks Summit, the eastern side of the Middle Fork Wild and Scenic River, and from the general area of Onion Valley to McRae Ridge. OSV use would be designated within 500 feet of centerline of the PCT on 1,717 acres of the PCT. <br> The proposed action to "designate" or "not designate" the area for OSV use immediately adjacent to the PCT addresses the 2005 Travel Management Regulation's minimization criteria requirements. Since this is a travel management planning process, there is no additional land management direction that would apply to the concept of a trail corridor associated with it. Future forest planning efforts would comply with FSH 1909.12 and would provide for the nature and purposes of the trail by also considering access, cultural and historic resources, recreational settings, scenic character, and valid existing rights. |
| PCT - Crossings - General Comment | It is greatly appreciated that the Forest identified the PCT on the project maps and has provided a clear definition of the term "OSV crossing". By doing so, the Forest is transparent and clear regarding the impacts of each alternative, allowing for a better understanding of the project and for a thorough public input process. | No further response required. General comment. |
| PCT - Crossings (Support) |  | The FEIS analyzes a range of options for PCT crossings, the number varies by alternative: Alternative 2 of the FEIS proposes 16; Alternative 3: 9; Alternative 4: 31; Alternative 5: 16. The analysis considers designating or not designating areas adjacent to the PCT for OSV use while protecting the non-motorized experience of the trail. Crossings need to be wide enough for OSV users to safely cross under varying snow conditions. The width and locations of these crossings in Alternative 2 of the FEIS strike a balance between providing access where there are already existing roads, and providing necessary PCT crossings where OSV access is needed. |
| PCT - Crossing as currently defined by the DEIS | Commenters stating how the DEIS defines PCT crossings. | This definition of OSV crossings for the Pacific Crest National Scenic trail on the Plumas National Forest was agreed upon by the Plumas County Coordinating Council OSV subcommittee (FEIS volume I page 12). |


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| PCT Trail Crossing (NonSupport) | Comments that are not supportive of a PCT crossing, for various reasons. Crossing are not needed due to snow cover, safety concern, difficult to locate and enforce, very limited non-motorized use. | The Pacific Crest National Scenic Trail Comprehensive Management Plan (1982) affirms that snowmobiling along the trail is prohibited by the National Trail System Act (PL. 90-543, Section 7(c). The comprehensive plan specifically addresses winter use as follows: <br> Snowmobiling on the trail is prohibited but crossing at designated locations is consistent with the purpose of the trail when such use is permitted on lands adjacent to the trail and does not cause damage to the trail, related resources, or facilities. (page 17). <br> Winter sports plans for areas through which the trail passes should consider this prohibition in determining areas appropriate for snowmobile use. Winter sports brochures should indicate designated snowmobile crossing of the Pacific Crest Trail where it is signed and marked for winter use. If cross-country skiing and/or snowshoeing are planned for the trail, any motorized use of adjacent land should be zoned to mitigate the noise of conflict (PCT comprehensive plan, page 21). <br> In compliance with the comprehensive plan, the alternatives consider designating crossings of the PCT, ranging from 9 crossing points to 31 crossing points. |
| PCT Buffer (Non-Support) and Access Concerns | Comments that are both specific and nonspecific regarding the PCT buffer. Many comments are not supportive of a buffer. Comments also provide general and specific examples of loss of access due to a buffer and express that any proposed exclusionary corridor around the PCT would be a direct violation of the NTSA provisions mandating management of the trail area be in harmony with adjacent multiple uses of federal lands. Other comments express support of a nonmotorized corridor. | The Pacific Crest National Scenic Trail Comprehensive Management Plan (1982) affirms that snowmobiling along the trail is prohibited by the National Trail System Act (PL. 90-543, Section 7(c). The comprehensive plan specifically addresses winter use as follows: <br> Snowmobiling on the trail is prohibited but crossing at designated locations is consistent with the purpose of the trail when such use is permitted on lands adjacent to the trail and does not cause damage to the trail, related resources, or facilities. <br> Winter sports plans for areas through which the trail passes should consider this prohibition in determining areas appropriate for snowmobile use. Winter sports brochures should indicate designated snowmobile crossing of the Pacific Crest Trail where it is signed and marked for winter use. If cross-country skiing and/or snowshoeing are planned for the trail, any motorized use of adjacent land should be zoned to mitigate the noise of conflict (FEIS volume I page 91 and PCT comprehensive plan, page 21). |


| Concern Category | Concern Statement | Concern Response |
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| PCT Buffer (Non-Support) and Access Concerns (continued) | Comments that are both specific and nonspecific regarding the PCT buffer. Many comments are not supportive of a buffer. Comments also provide general and specific examples of loss of access due to a buffer and express that any proposed exclusionary corridor around the PCT would be a direct violation of the NTSA provisions mandating management of the trail area be in harmony with adjacent multiple uses of federal lands. Other comments express support of a nonmotorized corridor. | The PCT comprehensive plan includes assumptions that were used in evaluation of alternatives during development of the plan. It notes that: The intent of Congress in prohibiting motorized use of the trail, as expressed in the Hearing documents, reference (S. 827 and H.R. 4866), was to eliminate the safety and noise conflict with hikers and equestrians. Crossing the trail right-ofway by snowmobiles would not be in conflict with the intent of Congress if such use were part of a winter sports plan that permitted snowmobiles to use the land adjacent to the trail (page 23). <br> Management of National Scenic Trails (NST) provide for the conservation and enjoyment of significant scenic, historic, natural, or cultural qualities. Other uses along the trail, which would not substantially interfere with the nature and purposes of the trail, may be permitted. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established. (National Trail System Act, P.L. 90-543). <br> Alternative 5 would not designated OSV use within 500 feet of the PCT, Alternative 3 would designate OSV use within 500 feet of the PCT on 1,186 acres, Alternative 4 would designate OSV use within 500 feet of the PCT on 5,294 acres (the same as under existing conditions). Alternative 2 was modified for the FEIS. In the modified alternative, areas not designated for OSV use adjacent to the PCT would be applied at Bucks Summit, the eastern side of the Middle Fork Wild and Scenic River, and from the general area of Onion Valley to McRae Ridge. OSV use would be designated within 500 feet of centerline of the PCT on 1,717 acres of the PCT. <br> The proposed action to "designate" or "not designate" the area for OSV use immediately adjacent to the PCT addresses the 2005 Travel Management Regulation's minimization criteria requirements. Since this is a travel management planning process, there is no additional land management direction that would apply to the concept of a trail corridor associated with it. Future forest planning efforts would comply with FSH 1909.12 and would provide for the nature and purposes of the trail by also considering access, cultural and historic resources, recreational settings, scenic character, and valid existing rights. |
| PCT - La Porte Access | Comments indicating that OSV Use (snowmobile) is needed to access any trails from the La Porte area for snowshoeing or skiing. | All alternatives consider designating OSV use in the La Porte area, designations range from a low of 61,399 acres in Alternative 5 to a high of 183,742 acres in Alternative 4 (which is more acres than are currently available for OSV use under existing conditions) See Table S-2 Comparison of Alternatives on page xvi of the FEIS. |


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| PCT - Information / Signage | Comments specific to the PCT regarding use of signage/information to manage uses. Signing a large crossing area vs entire corridor, cost benefit of managing corridor when very little use occurs in winter. | Many of the proposed designated crossings of the Pacific Crest National Scenic Trail would occur over National Forest System roads and should be readily identifiable under most conditions, either visually or through GPS tracking. Crossing points would be identified on any OSV use map developed after the decision is issued. However, the Forest Service recognizes that, under some extreme snowfall conditions, it may be impossible to accurately identify designated crossings. <br> The Plumas National Forest Over-snow Vehicle Use Designation FEIS considers a range of alternatives in terms of Pacific Crest National Scenic Trail OSV crossing points. Federal agency cost-benefit analysis need not convert all costs and benefits to monetary terms. The Plumas National Forest Over-snow Vehicle Use Designation FEIS evaluates costs and benefits associated with the range of management alternatives. Costs and benefits considered include recreational access, diverse recreation opportunities, use conflict, and ecological integrity. Costs and benefits are described in both quantitative and qualitative terms throughout the environmental consequences analysis in the FEIS. |


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| PCT - Setting Precedent | We are opposed to any assertion that motorized usage of the Pacific Crest Trail ("PCT") is prohibited by federal law, or prohibited by the 1982 PCT plan or under the existing forest plan. Such a position is not supported by these documents and each clearly conclude that motorized usage is allowed on the PCT. While we are aware this is a small issue on the PNF, the management of the PCT on other adjacent forests is a significant challenge and we are concerned that any precedent on this issue would seek to be applied to the PCT as a whole. | Thank you for your comment. <br> The National Trails System Act (NTSA), 16 USC § 1246(c), states that "National scenic or national historic trails may contain campsites, shelters, and related-public-use facilities. Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established. The use of motorized vehicles by the general public along any national scenic trail shall be prohibited..." <br> It is prohibited to use a motorized vehicle on the Pacific Crest National Scenic Trail without a special-use authorization. [CFR 36§261.20 Pacific Crest National Scenic Trail and 49 FR 25450, June 21, 1984. Redesignated at 70 FR 68291, Nov. 9, 2005] <br> The PCT Comprehensive Management Plan (1982), which provides trail-wide management guidance and was signed by USFS Chief Peterson, further provides that: <br> Snowmobiling along the trail is prohibited by the National Trails System Act, P.L 90-543, Section 7(c), Winter sports plans for areas through which the trail passes should consider this prohibition in determining areas appropriate for snowmobile use. Winter sports brochures should indicate designated snowmobile crossings on the Pacific Crest Trail where it is signed and marked for winter use if cross-country skiing and/or snowshoeing is planned for the trail, any motorized use of adjacent land should be zoned to mitigate the noise ... conflict. <br> Subpart C of Travel Management provides for the regulation of OSV use on National Forest System roads, National Forest System trails and in areas on National Forest System lands. Minimization of damage, harassment, and conflicts under 36 CFR 212.55(b) occurs in the context of the Forest Service's statutory obligation under National Forest Management Act and the MultipleUse Sustained-Yield Act, which includes balancing competing uses of NFS lands and providing for outdoor recreation (FSH 7709.55 Chapter 1014 (5)). Implementation of the Travel Management Rule requires that consideration of use conflicts are incorporated into the planning and analysis of establishing designated open areas and designated trails for OSV use. Consideration of a setback for motorized use for a specified distance from the centerline of the PCT would demonstrate application of the minimization criteria and would be a logical approach which will provide consistency across multiple forests for PCT management and Travel Management |


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| PCT - Setting Precedent (continued) | We are opposed to any assertion that motorized usage of the Pacific Crest Trail ("PCT") is prohibited by federal law, or prohibited by the 1982 PCT plan or under the existing forest plan. Such a position is not supported by these documents and each clearly conclude that motorized usage is allowed on the PCT. While we are aware this is a small issue on the PNF, the management of the PCT on other adjacent forests is a significant challenge and we are concerned that any precedent on this issue would seek to be applied to the PCT as a whole. | Seventy-nine miles of the Pacific Crest Trail cross the Plumas National Forest administrative boundary from the Lassen to the Tahoe National Forests. Almost eighteen miles of the PCT overlay in designated wilderness or special areas leaving just over 61 miles of PCT to evaluate the purpose and nature of the trail and use of over-snow vehicles. <br> An area not designated for OSV use is not applied when the PCT overlies and is adjacent to undesignated NFS lands or when NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT. Undesignated NFS lands do not authorize OSV use on $r$ adjacent to the PCT and an area not designated for OSV use adjacent to the PCT is not necessary. NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT within the previous 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> An area not designated for OSV use is applied at Bucks Summit a congested, high-use staging area; the eastern side of the Middle Fork Wild and Scenic River to provide a noise buffer; and from the general area of Onion Valley to McRae Ridge to include the preservation of historic ski trails. In areas where there are NFS trails, lands, and open areas proposed for designation, the purpose and nature of the PCT is protected by providing areas not designated for OSV use to mitigate noise. This is not precedent setting; rather these areas not designated for OSV use are applied to adhere to the National Trails System Act and Comprehensive Management Plan. <br> Refer to C/R\#130 for changes to alternative 2 (modified proposed action) with regard to the PCT. |
| Enforcement - Ability to Enforce | Commenters asked for clarification regarding how the Plumas NF would effectively enforce minimum snow depths, elevational restrictions, and closed areas. Commenters voiced skepticism regarding the agency's ability to enforce this proposal given current management examples with respect to wheeled vehicle enforcement. | To achieve compliance with Section 212.57, the Plumas OSV interdisciplinary team developed monitoring procedures to determine the effects of OSV use within the areas designated as open to OSV use and on the designated OSV snow trails. The monitoring procedures were designed to be able to: (1) measure the effectiveness of the designations in avoiding or minimizing resource damage; (2) measure public compliance within the OSV area and snow trail designations; (3) document enforcement of the OSV area and snow trail designations; and (4) measure use levels and patterns of use and identify concentrated use areas. Enforcement will be accomplished through a process of monitoring and enforcement as described in the FEIS under the topics Effectiveness monitoring (p.35), Compliance Monitoring (page 37) and Enforcement (page 38). |


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| Information / Signage (General) | General comments regarding information and use of signage to inform the public of elevational limitation for OSV use and to manage winter uses. | Consistent with the Travel Management Rule, during development of alternatives, the Plumas National Forest considered areas where snowfall would be adequate for OSV use to occur. <br> The final rule revised 36 CFR 212.81(a) reads as follows: <br> Over-snow vehicle use on National Forest System roads, on National Forest System trails, and in areas on National Forest System lands shall be designated by the Responsible Official on administrative units or Ranger Districts, or parts of administrative units or Ranger Districts, of the National Forest System where snowfall is adequate for that use to occur, and, if appropriate, shall be designated by class of vehicle and time of year... (FEIS p.2). <br> The existing groomed OSV trail networks in the Bucks Lake, Lakes Basin, and La Porte areas are located above 4,000 feet in elevation (Bucks Lake: 4,000 to 5,900 feet; Lakes Basin: 5,400 to 7,200 feet; and La Porte: 4,900 to 6,600 feet). (FEIS page 22). Areas under 3,500 feet are unlikely to receive snow in quantities adequate enough to support OSV use (FEIS page 29). <br> From this analysis and decision, the Forest Service would produce an OSV use map (OSVUM) that would be formatted similar to the existing MVUM for the Plumas National Forest. The OSV use map would allow OSV users to identify areas and trails where OSV use is designated on the Plumas National Forest. (FEIS volume I page 346-347) |
| Enforcement - Signage | I have ridden snowmobiles in other states as well as California, and other states do their best to sign areas that are closed. I always try to stay out of restricted areas, but when there are no signs it is sometimes hard to figure out where you are until you come across a landmark. <br> The Forest Service must provide signage to identify closed areas. It is not reasonable for OSV riders to use GPS and maps during their rides. | The Final Travel Management Rule, Subpart C does not require signing closed areas. Subpart C of the Travel Management Regulations require that, designated public OSV areas and trails shall be identified on a publicly available OSV-use map (OSVUM)[(36 CFR 212.81(c)]. Once issued, designations would be made enforceable under 36 CFR 261.14, which prohibits the possession or operation of an OSV on NFS lands other than in accordance with the Subpart C designations, subject to the exceptions listed at 36 CFR 261.14(a-f). OSV-use maps (OSVUMs) would be made available at Ranger District Offices, and major staging areas at Gold Lake, Bucks Summit, and La Porte as long as funding to produce maps is available. Electronic versions of the OSVUM would be available on the Plumas National Forest public website, and through AVENZA and other online applications so that route maps can be downloaded to mobile devices, which will help ensure both visitor safety user locations of restricted areas. In addition, major staging areas at Gold Lake, Bucks Summit, and La Porte have information boards where the OSVUM will be posted. |


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| OSV Use - Wild and Scenic River Eligible | Comments that indicate that OSV Use <br> Designation must consider eligible Wild and Scenic Rivers to maintain LRMP consistency. <br> Comment 79-23: Jamison Creek drainage should not be closed to OSV use. RX-18 guidance not in Plumas Forest Plan Comment 86-33: The DEIS does not provide a comprehensive list and map of eligible WSR segments and their proposed classification, with an indication of which specific segments will be open or closed to OSV use. Nor are the specific outstandingly remarkable values of the eligible rivers documented in the OSV plan. We strongly recommend that the alternatives be modified to exclude all eligible wild river corridors from OSV use. If any such use will be allowed, the Forest Service must disclose the impacts on the outstandingly remarkable values that make the river segments eligible for wild designation, and demonstrate that mitigation measures will be applied that will successfully mitigate such impacts | In compliance with the Forest Plan, the Wild zone of the Middle Fork Feather Wild and Scenic River is not designated for OSV use in any of the alternatives. FEIS volume II, page 41. This includes 10,813 acres where OSV use is prohibited within 0.25 mile of wild segments of Wild and Scenic Rivers, in compliance with Rx-2 Wild and Scenic River Prescription in the Plumas Forest Plan to maintain the area's outstanding values and primitive recreation settings. FEIS volume I, page 54. <br> The FEIS considers a range of alternatives regarding designation of OSV use adjacent to eligible wild and scenic river segments. Alternative 4 would designate OSV use adjacent to 43.5 miles of eligible wild and scenic river (the same as in existing conditions), Alternative 2 would designated 13.5 miles, Alternative 3 would designate 5.5 miles, and Alternative 5 would designate 7.5 miles adjacent to eligible wild and scenic rivers. |
| Access - Handicapped / Disabled | Restricting OSV access restricts access for physically disabled and limited mobility forest visitors who could not otherwise reach these areas. | Alternative 4 of the FEIS is the most favorable alternative for availability of motorized over-snow recreation opportunities, and would include the most OSV access for persons with disabilities or limited mobility. The Preferred Alternative (Alternative 2) of the FEIS includes less OSV access, but it strikes a balance between motorized opportunities, non-motorized opportunities, and protection of resources. |
| Green Sticker - Grooming | Comments that indicate grooming as paid for by green sticker fees is benefiting both motorized and non-motorized users. | Opportunities for the continued enjoyment of the Plumas National Forest areas and trails are provided under all alternatives. Registration fees support OSV grooming efforts and related activities on NFS land and other ownerships. The social analysis considers the social effects of the project based on the interaction of the values, beliefs and attitudes identified in the public comments with estimated changes to resource availability and uses. |


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| Groomed Trails - Forest <br> Service Guidance | Comments that indicate the Forest Service <br> has established guidance on timing of <br> grooming with regards to allowing <br> snowmobiling. | California State Department of Parks and Recreation Off-Highway Motor <br> Vehicle Recreation Division snow depth standards for grooming, currently <br> require 12 to 18 inches of snow accumulation. Under current management, <br> alternative 1, no action, 203 miles of trails are groomed for OSV use. To avoid <br> damaging resources on designated OSV trails with underlying roads, under <br> proposed action alternative 2, a minimum of 6 inches of snow or ice is typically <br> needed. OSV trails to be designated for public OSV use and identified for OSV <br> grooming would overlie existing paved, gravel, or native surface travel routes <br> with the exception of 4 trail segments with a total length of 0.74 mile. Under the <br> proposed action, alternative 2, 203 miles of trails would be available for <br> groomed for OSV use. Miles of trails groomed each year would depend on |
| available OHMVR Division funds and equipment. |  |  |


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| Trail Grooming Standards | $\begin{array}{l}\text { Comments related to trail grooming } \\ \text { standards. }\end{array}$ | $\begin{array}{l}\text { California State Department of Parks and Recreation Off-Highway Motor } \\ \text { Vehicle Recreation Division snow depth standards for grooming, currently } \\ \text { require 12 to 18 inches of snow accumulation. To avoid damaging resources on } \\ \text { designated OSV trails with underlying roads, under proposed action alternative } \\ \text { 2, a minimum of 6 inches of snow or ice is typically needed. OSV trails to be } \\ \text { designated for public OSV use and identified for OSV grooming would overlie } \\ \text { existing paved, gravel, or native surface travel routes with the exception of 4 } \\ \text { trail segments with a total length of 0.74 mile. Under the proposed action, } \\ \text { alternative 2, 203 miles of trails would be available for groomed for OSV use. }\end{array}$ |
|  |  | $\begin{array}{l}\text { Miles of trails groomed each year would depend on available OHMVR Division } \\ \text { funds and equipment. } \\ \text { Grooming additional miles would require increased funding from the California }\end{array}$ |
| OHMVR Division, which is not currently available, additional trail grooming |  |  |$\}$


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| OSV User Map | Because the Forest is setting different criteria for riding on trails and riding cross country, they must map and designate trails crossing areas open to cross country use. | Alternative 4 considered 2,610 miles of unmarked, ungroomed, underlying roads and trails within the designated OSV-use areas. The FEIS discloses all NFS roads within open areas, not signed or designated in each alternative to highlight the amount of snow trails within each open area. Snow depth was used as an indicator and assumption used to protect resources and prevent resource damage. Limitations of our administration, maintenance, and closure of designated OSV trails closed to wheeled vehicles were all considered in the analysis. Under the scenario the commenter requests for designating additional trails across open areas, this would require closure of these NFS routes to wheeled vehicles due to minimizing effects. As required under the Forest Service's Travel Management Regulations at 36 CFR Part 212 Subpart C, all areas and trails designated for public over-snow vehicle use will be displayed on a publicly available over-snow vehicle use map (OSVUM). |
| Access - Loss of OSV Access | We estimate the area of this open area to be 504,342 acres, or $41.9 \%$ of the forest. By restricting OSV use below 5,000' the PNF may find logical ways to segregate the Antelope, Davis, and Frenchman OSV areas into two OSV areas along Red Clover or Squaw Queen Creeks. Rocky Mountain elk and wolves are moving back onto the PNF and both of these drainages provide lower elevation big-game habitat. Because there are more contiguous roadless areas along Squaw Queen Creek we suggest restricting OSV use along Squaw Queen Creek to segregate these OSV areas. <br> Recommendations * Divide the large open area comprising the open parts of the Frenchman, Antelope, and Davis OSV areas into smaller, separate, non-contiguous parts by designating as closed to OSV travel areas that separate the large open area into smaller, isolated sections between which OSV travel is prohibited. <br> We have almost been successful at connecting Buck's Lake with La Porte and Bassett's through trail system. Why not preserve some history and develop the old Marysville-Carson City Trail | In response to the comment about restricting OSV use below 5,000 feet to provide greater segregation between designated OSV-use areas, a 5,000-foot elevational restriction was analyzed under Alternatives 3 and 5 of the FEIS. In response to the commenter's request to redraw the boundaries of the Frenchman OSV use area, there are natural topographic features between the Antelope and Frenchman OSV use areas that the Forest Service used to designate these boundaries. NFS road 29N43 was proposed as the main boundary between these two areas because Indian Creek along NFS Road 29N43 provides a natural discreet boundary line for much of the boundary. The only locations OSV users can feasibly cross the creek along the majority of the boundary line is at Antelope Dam and Babcock Crossing. The process by which interdisciplinary team use to identify designated OSV-use areas is described in the FEIS under Chapter 2, Alternatives. In order the designate open areas, the interdisciplinary teams considered existing groomed trail networks and associated facilities (i.e., staging areas, parking areas, and trailheads) as focal points; and identifying major geographic features such as rivers, ridgelines, major roads, and the Forest's administrative boundary to identify the area boundaries. <br> Alternative 4 considered 2,610 miles of unmarked, ungroomed, underlying roads and trails within the designated OSV-use areas. The FEIS discloses all NFS roads within open areas, not signed or designated in each alternative to highlight the amount of snow trails within each open area. Limitations of our administration, maintenance, and closure of designated OSV trails closed to wheeled vehicles were all considered in the analysis. It is possible crosscountry OSV access is possible along the Marysville-Carson City Trail the commenter refers to, however, designating additional trails across open areas would require closure of these NFS routes to wheeled vehicles due to minimizing effects in winter months. |


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| Access - Loss of OSV Access (continued) | Nor should OSV use be eliminated in areas like Jameson Creek as OSV use doesn't impact the water resources...it's Over Snow. <br> Loss of OSV opportunity: The Sheriff's Office is adamantly opposed to any decreased OSV acreage listed in any alternative or proposal. Any loss of legal OSV recreating acres will create user conflict that does not currently exist (Refer to additional comments below). | Alternative 4 of the FEIS provides the highest amount of acres open to OSV access (similar to existing use under Alternative 1). However, as described under Chapter 3 of the FEIS, Affected Environment and Environmental Consequences, Alternative 4, motorized OSV use overlaps with areas that are also desirable and accessible to non-motorized enthusiasts (within 5 miles of plowed trailheads) on 106,282 acres. In these locations, potential conflicts are more likely to occur, as motorized OSVs consume untracked powder snow that is desired by backcountry skiers, create tracks across the snow surface making skiing difficult, and creating safety concerns in areas where motorized and nonmotorized use is occurring at shared trailheads and on shared trails. <br> Designating OSV use open in the entire Jamison basin was also analyzed under Alternative 4. However, there are portions of Jamison Basin that are also extremely important to non-motorized users (in the area below Rock Lake). Alternative 2 of the FEIS strikes a balance between motorized and nonmotorized uses in the Jamison Basin - the northern portion of Jamison basin would remain open to OSV use, as this area is known to be an important area for OSV use. In the southern portion of the Jamison Basin, OSV use would be prohibited under alternative 2. Alternative 2 of the FEIS has also been modified from the DEIS in the area near A Tree. Section 3 near A Tree was added as open to OSV access near A Tree to allow for greater connectivity for motorized access from the Tahoe NF into the Plumas NF. |
| Boundary Management | Coordination between the Plumas and Tahoe National Forests, with respect to closed, restricted and open areas along the shared forest boundary; including along ridges, the PCT and, in Lakes Basin Recreation Area, needs to be identified as a component of this plan. It is essential that the recreating public be informed as to whether they have access across boundaries. Is the Sardine Lakes area closed? What about Packer Saddle to Sierra Butts Lookout? | Coordination between the Tahoe and Plumas National Forests occurred to ensure that there was continuity of OSV access between the administrative boundaries, including critical PCT crossings for OSV access. The area of Sardine Lakes and Packer Saddle to Sierra Buttes Lookout are located outside the boundaries of the Plumas National Forest, and therefore, are outside the scope of this project. |


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| DEIS Sufficiency - Use of Inaccurate Data | The commenters contend that the DEIS is insufficient, as it utilizes inaccurate information to arrive at conclusions. Registration numbers from California State Parks used in the DEIS are incorrect, and this fact is even acknowledged (Pg 81 DEIS Vol 1) *Data from CA State Parks, not official DMV records Using this same data, the 2009 OSV Winter Trailhead Survey1 also causes the survey conclusions to be incorrect. Registration records are readily available from both state DMV records and consolidated by year by the International Snowmobile Manufacturer Association, each year2, and dating back from 1977 available upon request (included with this document). In some cases registration numbers per year in California are off by as much as $40 \%$. When attempting to model use patterns the fundamentals must be sound. In this DEIS, any use numbers, economic data derived from them, and any projections made are thereby severely compromised. | The OSV registration numbers provided by California State Parks Off-Highway Vehicle Division, the agency that administers the State OSV program, were used to show general trends in OSV use across the forest, in combination with several other data sources. The National Visitor Use Monitoring (NVUM) results, California State Parks, California Outdoor Recreation Plan, National Recreation Survey and the Environment information and online visitor information sources provided by the Forest Service and other local organizations and industry was used as an overview of the recreation opportunities, visitor use, and trends within the analysis area. <br> The designation criteria used to develop alternatives to designate or not designate trails and areas for OSV use are listed in the FEIS volume I page 2. |
| Purpose and Need - Does not Balance Use | The Preferred Alternative (Alternative 2, Modified Proposed Action) strives to balance the availability of motorized and nonmotorized over-snow vehicle recreational opportunities and minimize impacts to natural and cultural resources, yet allocates $72 \%$ of the Plumas National Forest for OSV use. This is a disproportionate amount of the Forest that is open for OSV use given the small percentage of the public that participates in motorized winter recreation. | The Multiple-Use Sustained-Yield Act of 1960 authorizes and directs the national forests to be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes. Under the multiple-use principle, the Forest Service manages winter uses to conserve and sustain National Forest System (NFS) resources and provide a range of opportunities for motorized and non-motorized recreation. National forests are managed to provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. NFS lands are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the NFS lands to provide different opportunities for recreation. The criteria for designating roads, trails, and areas for OSV use in the Final Travel Management Rule, 36 CFR 212 Subpart C (effective January 28, 2015) |


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| Purpose and Need - Does not Balance Use (continued) | The Preferred Alternative (Alternative 2, Modified Proposed Action) strives to balance the availability of motorized and nonmotorized over-snow vehicle recreational opportunities and minimize impacts to natural and cultural resources, yet allocates $72 \%$ of the Plumas National Forest for OSV use. This is a disproportionate amount of the Forest that is open for OSV use given the small percentage of the public that participates in motorized winter recreation. | require the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts ( 36 CFR $212.55(\mathrm{~b})$ and $212.81(\mathrm{~d})$ ). Though some commenters believe that motorized and non-motorized forms of over-snow recreation are compatible, other commenters strongly believe that the two forms of winter recreation are conflicting and incompatible. Based on scoping and DEIS comments. The alternatives in the DEIS and FEIS were designed and modified to provide a range of over-snow recreation motorized access needs/opportunities, nonmotorized needs/opportunities, and other natural resource protections per NEPA requirements per FSH 1909.15 |
| DEIS minimization criteria application | Comments of application of minimization criteria <br> 1. Several comments stated the DEIS does not address how the Forest Service will monitor and enforce mitigation measures? The answers to these questions should be clearly spelled out in the EIS. <br> 2. The Forest Service must analyze the direct, indirect and cumulative impacts to wildlife and other resources. <br> 3. The Forest Service should have applied and presented analysis of minimization criteria for all alternatives, not just the preferred alternative. NO RESPONSE FOR THIS BELOW <br> 4. The DEIS does not provide enough information to evaluate how minimization criteria informed project design nor how criteria minimize impacts to wildlife and habitat, providing examples (habitat connectivity, marten, fisher, California redlegged frog, Sierra Nevada yellow-legged frog, mule deer, gray wolves, California spotted owl, and northern goshawk). | 1. The FEIS provides regulation and direction related to monitoring (volume I page 35, volume III page 215), describes effectiveness and compliance monitoring across resource areas (volume I pages 35-38, volume III pages 215217), and outlines enforcement and education methods and how monitoring efforts will provide information on use levels and patterns of use (volume I pages 38-39, volume III pages 216-217). The FEIS addresses how the monitoring and enforcement of the project will be implemented. <br> 2. The FEIS presents the project's regulatory framework (volume I pages 210217, volume II pages 23-62), issues, measures and direction (volume I pages 14-20); specifically discussing terrestrial (volume I page 162) and aquatic (volume I page 224) issues, resource indicators and measures (terrestrial volume I pages 163-164, aquatic volume I page 221), analytical methods (terrestrial volume I pages 160-163, aquatic volume I pages 219-220), while evaluating direct, indirect and cumulative environmental consequences for each species and all alternatives (terrestrial volume I pages 169-218, aquatic volume I pages 243-261). The Forest Service worked within its regulatory framework to analyze direct, indirect and cumulative impacts to wildlife and other resources while promoting OSV use. <br> 3. As an integral component in developing alternatives, the Forest Service considered, pursuant to the Travel Management Final Rule (36 CFR 212), the potential effects of designating NFS trails and areas on NFS lands for OSV use with the objective of minimizing impacts. A four-step process was utilized (FEIS, pages 23-25). Step 3 of this process - Measures to Minimize Impacts is described in the FEIS as follows: After potential impacts of conflicts were identified in Step 2, the interdisciplinary team considered whether a measure could be applied or if necessary to reduce the impact. If a measure was necessary, the measure was developed and specifically tied to a potential or occurring impact. In some instances, the measure became a component of |


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| DEIS minimization criteria application (continued) |  | one or more alternatives (e.g., minimum snow depth). In other instances, the measure identified was to not designate a trail or a portion of an OSV-use area and those trails or areas were eliminated from one or more alternatives. (Appendices D and E). <br> 4.The FEIS presents the project's regulatory framework (volume I pages 210217, volume II pages 23-62), issues, measures and direction (volume I pages 14-20); specifically discussing terrestrial (volume I page 162) and aquatic (volume I page 224) issues, resource indicators and measures (terrestrial volume I pages 163-164, aquatic volume I page 221), analytical methods (terrestrial volume I pages 160-163, aquatic volume I pages 219-220), while evaluating direct, indirect and cumulative environmental consequences for each species and all alternatives (terrestrial volume I pages 169-218, aquatic volume I pages 243-261). The Forest Service worked within its regulatory framework to analyze direct, indirect and cumulative impacts to wildlife and other resources while promoting OSV use. <br> Direction on habitat connectivity was presented (volume I, terrestrial pages 61, aquatic pages 63), and the FEIS acknowledges incomplete and unavailable information regarding habitat connectivity in certain cases (volume I page 165); however, habitat connectivity was used as an indicator and resource measure (volume I pages $61,163,168,178-179,182$ ) in the FEIS and alternative-specific connectivity assessment was completed (volume I pages 182-183). The FEIS presents rules regarding the use of minimization criteria to inform project design, presents the application of criteria to all wildlife species and alternatives, while explicitly addressing habitat connectivity across the landscape. |
| DEIS Sufficiency - Potential Failures | Commenter submission states: <br> Along with the errors, misinformation stated above, this DEIS contains: <br> - Proposed limitations to OSV recreation in violation to the existing LRMP <br> - Biased and erroneous opinions masquerading as fact regarding OSV recreation based on ideology. <br> - Hearsay regarding user conflict, unsupported by documentation <br> - Incorrect registration numbers from California State Parks instead of valid information from the Department of Motor Vehicles used for modeling of alternatives. | The Travel Management Regulations set forth designation criteria that are to guide the responsible official's designation of areas and trails for OSV use (see 36 CFR §212.55(a-e1) and are found in the FEIS, appendices D and E. These criteria delineate certain elements and resources, the effects on which the responsible official must consider. <br> The Travel Management Regulations describe the general designation criteria (36 CFR 212.55(a)) as follows: <br> In designating National Forest System roads, National Forest System areas and trails on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System 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. |


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| DEIS Sufficiency - Potential Failures (continued) | - Studies by Winter Wildlands, which are not peer-reviewed but consist of erroneous and negative conclusions based on ideology, from an organization that condones smear campaign tactics against OSV recreation. It does not contain: <br> - A forest plan amendment that would allow changes to existing OSV access. <br> - An analysis that seriously considers negative effects to motorized enthusiasts from the proposed loss of area open to OSV travel. <br> - An analysis how rural community economic viability would likely be affected by the proposed loss of opportunity in the proposed action. <br> - An analysis indicating how the proposed loss of opportunity would diminish OSV recreational experience. <br> - A true No Action Alternative <br> Suggested by commenter: <br> Remedy: The forest must issue a Supplemental Draft Environmental Impact Statement because this DEIS violates the existing LRMP. The new document must comply with the existing LRMP or propose a forest plan amendment. The new document must also disregard and remove analysis and consideration of non-motorized use because it is clearly outside the scope of this NEPA analysis. The inclusion of this information shortchanges the OSV community and violates Subpart C Final Rule guidelines. All reference to nonmotorized opportunities must be eliminated from the DEIS, otherwise the document fails in all capacities. | The Travel Management Regulations describe the specific designation criteria (36 CFR 212.55(b)) as follows: <br> In addition to the criteria in paragraph (a) of this section, in designating National Forest System areas and trails on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: <br> 1. Damage to soil, watershed, vegetation, and other forest resources; <br> 2. Harassment of wildlife and significant disruption of wildlife habitats; <br> 3. Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and <br> 4. Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. <br> In addition, the responsible official shall consider: <br> 5. Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors. <br> Additionally, 36 CFR 212.55(d) requires the responsible official to recognize: <br> 1. Valid existing rights; and <br> 2. The rights of use of National Forest trails of access in designating trails and areas for OSV use. <br> And 36 CFR 212.55(e) provides that: <br> National Forest System trails, and areas on National Forest System lands in wilderness areas or primitive areas shall not be designated for motor vehicle use ... unless, in the case of wilderness areas, motor vehicles use is authorized by the applicable enabling legislation for those areas. <br> To apply the minimization criteria ( 36 CFR 212.55(b)(1-4)) and the other specific criteria for designating trails and areas for OSV use ("Specific Designation Criteria")(36 CFR 212.55(b)(5); (d); and e)), the Forest Service conducted a minimization criteria screening exercise that included four steps. Chapter 2 of the FEIS provides a more detailed description of the minimization criteria screening exercise. <br> The screening exercise was applied to the existing network of OSV trails, including groomed and ungroomed, additional trails proposed during public comment periods, and for NFS lands that received adequate snow. Results of this exercise helped identify potential impacts and conflicts that may occur as a result of designating OSV trails and areas. The exercise resulted with the OSV trails and areas proposed in one or more action alternatives or eliminated from proposed designation. |


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| DEIS Sufficiency - Potential Failures (continued) |  | The 1988 Plumas National Forest Land and Resource Management Plan was developed under the 1982 Planning Rule. Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, level of resource production and management, and the availability and suitability of lands for resource management (1982 Planning Rule, section 219.1(b)). The forest plan shall contain four parts, one of which is "(c) Multipleuse prescriptions and associated standards and guidelines for each management area including proposed and probable management practices...." (1982 Planning Rule, section 219.11). <br> The Plumas National Forest Land and Resource Management Plan identifies Forest goals and policies for recreation as follows (pages 4-3): <br> 1a. Provide for a variety of forest-related recreation, and coordinate recreation with other resource use through the Recreation Opportunity Spectrum system. Encourage growth of privately-operated facilities serving public needs. Improve and expand developed facilities and trails to meet demand while reducing unit costs and protecting other resources. <br> Complete acquisition of Wild and Scenic River lands and easements. Minimize conflicts between various recreational users. <br> Manage selected unroaded areas to provide for semi-primitive opportunities. 1b. Allow use of off-road vehicles wherever user conflicts or unacceptable resource damage are unlikely. <br> Provide separate ORV routes wherever conflicting uses are substantial. Because the Plumas National Forest Land and Resource Management Plan (PNF LRMP) was completed in 1988, the minimization criteria of the 2005 and updated 2015 Travel Management Rule were considered as an overlay to the goals, policies, standards, and guidelines of the PNF LRMP. Forest Plan amendments are required for actions that exceed the standard and guideline thresholds, not for activities that are within that threshold. For example, if oversnow vehicles (or ORVs) were not allowed in a specific area as identified in the 1988 PNF LRMP and this project proposed to designate an area or trail for OSV that is currently prohibited, a Forest Plan amendment would be required. However, when snowmobiles are allowed by the PNF LRMP, and this project proposes to not designate snowmobile use, there is no requirement for a forest plan amendment because the use is within the threshold. |


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| DEIS Sufficiency - Potential Failures (continued) |  | Rx-8 Semi-Primitive Area Prescription is described in the PNF LRMP on page 4-88-4-90. The description of $R x-8$ states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow nonmotorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area. The prescription applies to the following roadless areas: Bald Rock, Beartrap, Chips Creek, Dixon Creek, Grizzly Ridge, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak" (PNF LRMP, page 4-88). General direction includes "provide a non-motorized experience (1a)" and standards and guidelines state "allow no motorized travel except over-the-snow and management access" (PNF LRMP, p.4-88). <br> Semi-Primitive Area Prescription (Rx-8) of the 1988 Plumas National Forest Land and Resource Management Plan (LRMP) was not recommended for designation in open areas to minimize effects to the semi-primitive nature of Rx-8. The Semi-Primitive Prescription description in the LRMP emphasizes non-motorized recreation and states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area" and applies to a total of 79,500 acres of NFS land (page 4-88). <br> The 1988 LRMP considered specific standards and guidelines for the Lakes Basin Management Area and states "Allow motorized over-the-snow travel, but consider restricting to designated areas if conflicts develop with other users or resources" (page 4-324). The NFS lands proposed for designated open areas for OSV use is a result of minimization criteria evaluation and consideration of public comments specific to the Lakes Basin area and site specific comments around uses, conflicts, and resource concerns. <br> Based on comments received during public comment periods, the open area in Lakes Basin was modified. The modified open area proposed for designation is from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and follows a ridge toward Graeagle Lodge. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. |


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| DEIS Sufficiency - Potential Failures (continued) |  | The Plumas National Forest Environmental Impact Statement (EIS) for the Land and Resource Management Plan discussed semi-primitive areas in the context of the existing condition and affected environment for each alternative considered. Focusing on the existing condition for recreation resources the EIS for the LRMP states "Due to the extensive PNF road system, no "primitive" areas and only 12 "semi-primitive" areas over 2,000 acres each remain on the Forest. One, the Bucks Lake Wilderness, is discussed in the later section Wilderness. The others are described in appendix L [of the EIS]. In addition to the Bucks Lake Wilderness and the Wild and Scenic River, about 115,000 acres (or 9.9\% of the Forest) are free from motorized use, and 7,000 acres ( $0.6 \%$ of the Forest) contain only 4WD [4 wheel drive] trails. All of the areas except Dixon Creek have high scenic value due to their distinctive landscape" [EIS for the LRMP, (11), page 3-27]. <br> It is also worth noting that in 1988 the EIS for the LRMP stated that "Crosscountry skiing is the fastest growing dispersed recreation activity on the Forest" (EIS for the LRMP, (f), page 3-31). The EIS for the LRMP further explained "Existing demand conflicts would require resolution, including: (3) Snowmobiling vs. cross-country skiing, within 1-2 miles of points of departure" (EIS for the LRMP, p.32). <br> Focusing on the affected environment for recreation resources and consequences common to all alternatives, the EIS of the LMRP states "Although areas closed to wheeled vehicles would vary considerably by alternative, topography in fact makes most of the Forest inaccessible. Since the vast majority of the accessible Forest would be open in all alternatives, the needs of the many small ORV groups and individual ORV recreationists should be met even in the absence of semi-primitive ROS class allocations. Certain new closures would occur, frustrating some individuals." Under the preferred alternative that was selected in the Record of Decision, "About 79,500 acres ( $6.8 \%$ of Forest total acreage) would be retained as semi-primitive areas. Nevertheless, the Forest's present capacity to meet semi-primitive demand would be largely utilized by 2000" (EIS of the LRMP, page 4-10). <br> Appendix L of the EIS for the LRMP includes areas considered for semiprimitive management (EIS for the LMRP, pages L-1 -L-41). This appendix described the semi-primitive areas on the PNF as defined by the Recreation Opportunity Spectrum (larger than 2,500 acres). Semi-primitive areas considered in the preferred alternative include: Adams Peak, Bald Rock, Beartrap, Bucks Creek, Chips Creek, Dixon Creek, Grizzly Peak, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak. |


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| DEIS Sufficiency - Potential Failures (continued) |  | The 1988 PNF LRMP was appealed by several entities-in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. <br> Prohibiting OSV use within Rx-8 is within the responsible official's discretion and does not require a forest plan amendment. A forest plan amendment is not required because prohibition of OSV use does not impact $R x-8$ areas beyond the limits of the LRMP analysis. Prohibiting OSV use in $R x-8$ is within the analysis framework considered in the LRMP, does not exceed the uses proposed in the LRMP, and is within the Responsible Official's discretion. Further, this prohibition is supported by "activities are permitted only if they are unobtrusive and maintain the character of the area", which was considered during minimization criteria evaluation. A forest plan amendment is not required by prohibiting OSV use in Rx-8 areas. This logic and conclusion applies to all areas of the Forest where the 1988 PNF LRMP currently allows OSV use and this project recommends prohibition of OSV use. <br> In the context of this project and OSV use designations, a forest plan amendment is required when OSV use is proposed in areas where the LRMP prohibits or restricts OSV use. For example, under the Bald Eagle Habitat Prescription (Rx-11) the LRMP states "close the areas to ORVs" (OSV are included in the definition of ORV, see LRMP EIS, Glossary, Definitions, page 29). Allowing OSV use in Rx-11 exceeds the limits of the analysis in the LRMP. Allowing OSV use in Rx-11 is not within the analysis framework considered in the LRMP, exceeds the uses proposed in the LRMP, is not within the Responsible Official's discretion, and would require a forest plan amendment using the 2012 Planning Rule regulations. |


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| DEIS Sufficiency - Potential Failures (continued) |  | Bald eagles are protected under the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act. Plumas LRMP (1988) Bald Eagle Habitat Prescription ( $\mathrm{Rx}-11$ ) includes the following: Limit recreation use in bald eagle habitat, 4-96); Close the areas to ORV use (4-96); Preclude development of recreation facilities within the nesting territories (4-96). Between November 1 and March 31, limit activities within winter roost habitat to minimize disturbance (4-97). Consistent with Forest Plan (Rx-11), bald eagle nesting territories would not be designated for cross-country OSV use. Pass-through only travel on designated OSV trails would be allowed in these areas. Limiting OSV travel to the trail only within (and adjacent to) eagle territories would likely mitigate potential adverse effects to eagles (FEIS, appendix D). <br> Prohibiting OSV use within congressionally designated roadless and inventoried roadless areas resulted from minimization criteria evaluation. Although the 2001 Roadless Rule established prohibitions on road constructions, road reconstruction, and timber harvesting in inventoried roadless areas on NFS lands, the intent of the final rule is to provide lasting protection for inventoried roadless areas within the NFS in the context of multiple use management (Special Areas; Roadless Area Conservation, Federal Register, volume 66, number 9, page 3244). Roadless areas often provide outstanding dispersed recreation opportunities, mechanized means of travel is often allowed. These areas can often take pressure off heavily used wilderness areas by providing solitude and quiet, dispersed recreation opportunities (lbid, page 3245). Further, most of the Inventoried Roadless Areas resulting from the 2001 Roadless Rule were considered under the then current direction during the development of the 1988 Plumas National Forest Land and Resource Management Plan. Generally IRAs overlay with semiprimitive areas. Prohibiting OSV use within IRAs and Semi-Primitive Prescription (Rx-8) was to "maintain the character of the area." <br> The Record of Decision for the LRMP states "about 9 percent of the PNF will be managed for semi-primitive and primitive recreation as provided by roadless areas, wild and scenic rivers, and Wilderness. As cross-country skiing and snowmobiling increase, a high priority will be placed on managing and coordinating these sometimes conflicting uses" (page 3). "The Semi-Primitive Prescription (Rx-8) permits limited management activities...to take place in these areas provided that the semi-primitive nature of the area is protected. Opportunities are available for activities such as hiking and walking, horseback riding, viewing scenery, camping, hunting, nature study, mountain climbing, swimming, fishing, cross-country skiing and snowshoeing" (page 5). |


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| DEIS Sufficiency - Potential Failures (continued) |  | When considering public comments around "Semi-Primitive Roadless" designation for the LRMP and drafting the ROD, "the title of the prescription for management of these areas has been changed from Semi-Primitive NonMotorized to Semi-Primitive. Language has also been inserted into the SemiPrimitive Prescription ( $\mathrm{Rx}-8$ ) that would permit limited management activities to take place in these areas providing the semi-primitive nature of the areas is protected" (page 11). <br> The ROD for the LRMP clarifies "the only Semi-Primitive Motorized Area (SPM) on the Forest in the FEIS is Adams Peak (7,000 acres). Accordingly the SPM designation has been dropped in the Plan, even though motorized use will still be allowed to occur" (page 11). This helps explain why the title of designation in the LRMP reads as "Semi-Primitive" Prescription, emphasized non-motorized uses, and does not include a "non-motorized" or "motorized" descriptor in the title. <br> The 1988 PNF LRMP was appealed by several entities; in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. <br> An agreement between appellants and the Plumas National Forest resulted in the Plumas National Forest considering all rivers and river segments on the Plumas National Forest, and identified several river segments as "eligible" for Wild and Scenic River designation. An agreement between the appellants and the Plumas National Forest included a commitment for "planned Forest Service management activities within $1 / 4$ mile of each bank of the river or stream will be consistent with the direction for Wild and Scenic rivers until eligibility and river classification is determined". Eligible rivers and river segments that included wild zones were not proposed for OSV designations because "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" (Public Law 90-542Oct. 2, 1968, page 907). A quarter mile buffer was placed around eligible wild and scenic river segments, specifically those with wild zones, and not included for OSV use designations during minimization criteria evaluation to maintain the "shorelines essentially primitive and waters unpolluted." |


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| DEIS Sufficiency - Potential Failures (continued) |  | The 1988 LRMP contains opportunities for management change for the recreation resources. One of these identified opportunities is to "develop parking and sanitation facilities for cross-country skiers and snowmobilers and resolve conflicts between them" (pages 3-6). In areas of high motorized and non-motorized use such as Bucks Lake and Lakes Basin, and for the purposes of OSV use designations, areas that receive adequate snow, an opportunity for management change was identified. Coupled with public comments that include displacement of non-motorized users because of motorized uses it is the Responsible Official's requirement to consider the effects with the objective of minimizing "conflicts between motor vehicle use and existing or proposed recreational uses of NFS lands..." (36 CFR 212.55(b)). <br> Antelope and Frenchman open area boundaries follow Indian Creek where there are two locations that users can feasibly cross-Antelope Dam and Babcock Crossing. Davis and Frenchman open area boundaries follow a natural boundary as Red Clover Creek and Clover Valley is a large (7 miles) section of private land. The remainder of this boundary, about 5 miles, follows the Beckwourth-Genesee Plumas County road. There are limited crossings along this boundary as well-Knotson Bridge, Drum Bridge, a bridge at NFS road 25N05, and Plumas County road 177. At Janesville Grade specifically, there are no topographic features with the exception of Janesville Grade (NFS road 28N01 and Plumas County road 208). Topographic features were considered when identifying discrete open areas for this project. <br> The following modifications were applied to the alternative 2 (modified proposed action). <br> Bucks Lake Open Area <br> 1. From Plumas County Road 414, designate and groom 24 N 33 to the intersection of 24N89X; continue grooming 24N89X to the intersection of 24N89XA. This leads users away from the Bucks Lake Wilderness boundary, provides a longer groomed OSV trail and a safe turn around location for the grooming machine. These NFS roads and segments were added to appendix C of the FEIS and minimization criteria were evaluated for each. <br> A version of the NFS 24N33 road was considered in Alternative 4 with inaccurate data from Infra and outdated road location information. Knowledge of road location on the landscape informed us that 24N33 was rerouted into 24N89X and that the 24N33A (spur) no longer exists. <br> 2. Remove proposed designated OSV open areas west of Bucks Lake. Prohibit OSV use west of NFS road 24N24, and 24N35 and 24N25Y (considered two unique areas adjacent to one another), north of 24N34. These areas receive little to no OSV use due to steep terrain and risk of avalanches. |


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| DEIS Sufficiency - Potential Failures (continued) |  | 3. Redraw proposed designated OSV open area in the Yellow Creek area of the Chips Creek Roadless area northwest of Bucks Lake Wilderness. Redraw open area to NFS road 26N26 and ridge above 26N26. Limiting the OSV open area to the ridge removes a steep slope that provides access to a creek. This is not a high use or value area for OSV use. <br> 4. Remove proposed designated OSV open area north of Indian Creek in the Chips Creek Roadless area. Removing this small open area protects the semiprimitive nature of the Chips Creek Roadless area. <br> 5. Remove proposed designated OSV open area in and around the Gold Lake ski trail, adjacent to the Gold Lake staging area, including Gray Eagle Creek (NFS lands west of Plumas County Road 519). The area removed extends from the southern edge of private land near Graeagle, Gray Eagle Creek, the Gold Lake ski trail, and NFS lands that reach the Graeagle Lodge. NFS lands east of Plumas County Road 519 are generally designated as open. This change separates motorized and non-motorized uses, such that OSVs are not crossing or using a non-motorized trail or Gray Eagle Creek. <br> Lakes Basin Open Area <br> 1. Redraw open area in Lakes Basin. Propose designation of open area from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and use ridge toward Graeagle Lodge as boundary change. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. <br> 2. Propose designation of NFS lands in section 3 nearest to "A Tree" adjacent to the Tahoe and Plumas National Forests administrative boundary. <br> 3. Adding section 3 near A Tree allows for motorized use from the Tahoe onto the Plumas and provided connectivity from NFS road 23N08 onto Plumas County Road 507. These roads provide access to the larger La Porte open area, La Porte, and Onion Valley. <br> 4. Remove proposed designated open area in sections 29 and 32 near A Tree Campground in between McRae Ridge and NFS road 23N08, and immediately adjacent to the La Porte and Lakes Basin open area unit boundary. |


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| DEIS Sufficiency - Potential Failures (continued) |  | 5. Remove proposed designated OSV open area in and around the Gold Lake ski trail, adjacent to the Gold Lake staging area, including Gray Eagle Creek (NFS lands west of Plumas County Road 519). The area removed extends from the southern edge of private land near Graeagle, Gray Eagle Creek, the Gold Lake ski trail, and NFS lands that reach the Graeagle Lodge. NFS lands east of Plumas County Road 519 are generally designated as open. This change separates motorized and non-motorized uses, such that OSVs are not crossing or using a non-motorized trail or Gray Eagle Creek. <br> Lakes Basin Open Area <br> 1. Redraw open area in Lakes Basin. Propose designation of open area from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and use ridge toward Graeagle Lodge as boundary change. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. <br> 2. Propose designation of NFS lands in section 3 nearest to "A Tree" adjacent to the Tahoe and Plumas National Forests administrative boundary. <br> 3. Adding section 3 near A Tree allows for motorized use from the Tahoe onto the Plumas and provided connectivity from NFS road 23N08 onto Plumas County Road 507. These roads provide access to the larger La Porte open area, La Porte, and Onion Valley. <br> 4. Remove proposed designated open area in sections 29 and 32 near A Tree Campground in between McRae Ridge and NFS road 23N08, and immediately adjacent to the La Porte and Lakes Basin open area unit boundary. <br> 5. Remove proposed open area designation in section 33 to provide contiguous areas not designated for OSV use within sections 32,33, and 34 as this has high value to non-motorized users. Designation of NFS Road 23N08 allows OSV access through the closed area from Lakes Basin to La Porte. Designate NFS road 23N08 as an ungroomed OSV trail to provide access across undesignated NFS lands between open areas, and to provide access to open areas from Sloat. Designation of NFS road 23N08 overlies Lakes Basin and La Porte open areas. |


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| DEIS Sufficiency - Potential Failures (continued) |  | La Porte Open Area <br> Just north of Harrison Campground redraw the open boundary to include NFS 23N10 extreme eastern portion of the road. Insignificant change for motorized uses, portion of SIA that would become open is extremely steep and densely vegetation and would not likely receive OSV use. <br> Davis Open Area <br> Designate NFS lands just south of Indian Valley, toward the east near Iron Dyke, along Plumas County Road 208. Designate NFS lands on the eastern edge of Greenville overlying NFS road 28N32. This addition provides connectivity from private land and NFS lands proposed for designation for cross-county OSV travel. <br> Antelope Open Area <br> Designate NFS lands along North Arm in Indian Valley south of Engel Mine to provide access from private land to designated NFS lands as open areas allowing cross-country travel. <br> Pacific Crest Trail Areas Not Designated for OSV Use <br> Seventy-nine miles of the PCT cross the Plumas National Forest administrative boundary from the Lassen to the Tahoe National Forests. Almost 18 miles of the PCT overlie designated wilderness or special areas leaving just over 61 miles of PCT to evaluate the purpose and nature of the trail and use of oversnow vehicles. <br> An area not designated for OSV use is not applied when the PCT overlies and is adjacent to undesignated NFS lands or when NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT. Undesignated NFS lands do not authorize OSV use on or adjacent to the PCT and areas not designated for OSV use adjacent to the PCT are not necessary. NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT within the previous 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> An area not designated for OSV use is applied at Bucks Summit, a congested, high-use staging area; the eastern side of the Middle Fork Wild and Scenic River to provide a noise buffer; and from the general area of Onion Valley to McRae Ridge to include the preservation of historic ski trails. |


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| DEIS Sufficiency - Potential Failures (continued) |  | Bucks Summit <br> 1. From Bucks Summit staging area off of Plumas County Road 414, heading south along the PCT, increase areas not designated for OSV use in between two designated and groomed OSV trails: NFS roads 24 N 29 Y and Plumas County Road 119 (Big Creek Road). On the west side of the PCT, the area not designated for OSV use starts along the ridge in between NFS road 24N29Y and the PCT. On the east side of the PCT, the area not designated for OSV use extends from the Bucks Summit trailhead to the Plumas County Road 119. NFS lands adjacent to Plumas County Road 414 near Deadwood Creek and adjacent to private lands were also included in the areas not designated for OSV use. <br> The Bucks Summit trailhead receives both non-motorized and motorized uses. The areas not designated for OSV use provide a noise barrier along the PCT in a congested area. This segment of the PCT provides about 3 miles of gentle terrain to the south of Bucks Summit. <br> Intersection of NFS road 24N29Y and Plumas County Road 119 (Big Creek Road) to Lookout Rock <br> 1. Remove entire area not designated for OSV use adjacent to PCT because motorized roads and trails intersect and parallel the PCT within the 500-foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> Lookout Rock to Butte Bar Campground <br> 1. Remove entire area not designated for OSV use adjacent to the PCT because a buffer or zone in this section of the PCT is not necessary since it overlies NFS lands that are not designated for cross-country OSV travel. This area is also a Semi-Primitive area ( $\mathrm{Rx}-8$ ) from the 1988 PNF LRMP, and there are very few existing roads. There are no roads or motorized trails in the vicinity of the PCT. <br> Butte Bar Campground to southeast corner of section 1 (T22N, R8E) <br> 1. Remove entire area not designated for OSV use adjacent to the PCT because this section of the PCT overlies NFS lands that are not designated for cross-county OSV travel. <br> Southeast corner of section 1 to intersection with NFS road 22N56 <br> 1. Remove areas not designated for OSV use adjacent to PCT because NFS roads (23N65Y, 23N65YB, and 22N56) parallel the PCT within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. |


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| DEIS Sufficiency - Potential Failures (continued) |  | Intersection with NFS road 22N56 to east side of private land in section 11 <br> (T22N, R8E) <br> The Fowler Lake area overlaps with a Special Interest Area or Research Natural Area and overlies NFS lands that are not designated for cross-country travel, so a non-motorized buffer is not necessary within the Fowler Lake SIA. Two parcels of private land overlie the PCT and are not designated for cross-country travel. Areas not designated for OSV use are not necessary in these locations. <br> 1. Remove the areas not designated for OSV use adjacent to the PCT from the intersection of NFS road 22N56 and then again from the eastern edge of the SIA/RNA to the eastern edge of the private land parcel in section 11. There are roads adjacent to PCT in Section 15 and there is no non-motorized continuity in this area between the private parcels. <br> Private land in section 11 to intersection of Plumas County Road 511 (Forest Highway 120) <br> 1. Remove areas not designated for OSV use adjacent to the PCT because two designated, groomed trails (NFS road 22N60 and Plumas County Road 120) crisscross and parallel the PCT. These roads are within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> Plumas County Road 511 to Intersection of Plumas County Road 507 and NFS Road 22N46 <br> 1. Remove areas not designated for OSV use from County Road 511 to the PCT's intersection with NFS Road 22N82X. <br> 2. Maintain areas not designated for OSV use adjacent to the PCT at the intersection with NFS Road 22N82X, around the northeast side of Pilot Peak, and adjacent to the PCT along Bunker Hill Ridge, southeast to where the PCT is within the Semi-primitive Prescription (RX-8). A widened area not designated for OSV use along the PCT both meets the nature and purpose of the trail, and recognizes historic uses of the trail as the 'Lost Sierra Ski Traverse'. <br> NFS Road 22N46 to Tahoe National Forest (administrative boundary) <br> 1. Remove areas not designated for OSV use adjacent to PCT because the PCT parallels NFS 22N46 and then crisscrosses two national forest administrative boundaries numerous times. Generally, NFS lands are designated as open on both national forests, the Tahoe National Forest selected alternative does not include areas not designated for OSV use adjacent to the PCT. Given the PCT crisscrosses administrative boundaries, areas not designated for OSV use adjacent to the PCT in only the Plumas National Forest results in fragments of non-motorized areas that are impractical for implementation. |


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| DEIS Sufficiency - Potential Failures (continued) |  | General Changes <br> 1. Generally, remove designated ungroomed OSV trails that overlap with open areas. All designated ungroomed OSV trails that cross private ownerships, restricted and prohibited areas, or connect open areas should remain for designation to illustrate the trail is needed to access an otherwise prohibited or restricted area. <br> 2. Our current action alternatives include county roads as proposed designated NFS OSV trails and in most cases grooming. Based on current jurisdiction in Infra, these roads are not aligned with Travel Management Rule, Subpart C regulations, such that the Forest Service should not designate county roads as NFS OSV trails. Remove county roads, with county jurisdiction, from all action alternatives, from proposed designation as NFS OSV trails. <br> Maintain county roads, with county jurisdiction, in all action alternatives that are proposed for grooming. These will be displayed on our alternative maps as "other groomed OSV trails" and will not be designated as NFS OSV trails. 3. Change vehicle class definition from width to pounds per square inch. Vehicle class is now defined by the ground pressure exerted by different types of OSVs to better align with potential resource impacts (as heavier vehicles create deeper tracks and can potentially cause resource damage). The revised Class 1 OSVs include those that typically exert a ground pressure of 1.5 pounds per square inch (psi) or less. This class includes snowmobiles, tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked utility terrain vehicles (UTVs), and snow-cats. The revised Class 2 OSVs include those that typically exert a ground pressure of more than 1.5 psi. This class includes tracked fourwheel drive (4WD) sport utility vehicles (SUVs) and tracked 4WD trucks. Class 1 will be able to operate on areas and trails designated for OSV use while Class 2 will be restricted to designated OSV trails available for grooming." <br> 4. Miscellaneous parcels of NFS land that were inaccessible islands were deleted |
| DEIS Format Deficiency | Due to the massive size of the PNF DEIS 2018 document, it is absolutely mind numbing, frustrating and oppressive while trying to find one's way through this document. | Thank you for your feedback. We apologize for any inconvenience this has caused. |


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| Potential Fatal Flaws | The Plumas LRMP prescriptions dictate management of the Plumas NF. The prescriptions cannot be changed without a LRMP Amendment. This inconsistency must be corrected. Deviation from the LRMP without an amendment would be a fatal flaw in the FEIS. <br> The Recreation opportunity spectrum appears to be in conflict with the Rx prescriptions, according to the GIS data for Alt 2. The LRMP takes precedence over the ROS data, which appears to have been used in a decision making process: so the ROS is irrelevant in this situation. The ROS must be eliminated. <br> OSV use on frozen lakes is not prohibited in the document but appears to be excluded on the DEIS maps. <br> $R x$ and ROS Solutions: 1. All Rx-8, Rx-5, $R x-10$, and $R x-14$ areas must remain open to OSV use, as stated in the LRMP. 2. The ROS data set should not be used when there is a conflict between Rx and ROS, and those areas must be reanalyzed. Errors are due to old technology in mapping. 3. All FS system roads with a Legal Right of Way must allow OSV use. 4. The Brady Camp area must remain open to OSV. 5. OSV use on frozen lakes must be allowed to continue. | Thank you for your comment. <br> The Wilderness Act of 1964 as amended requires that "All National Forest lands within Congressionally designated Wilderness and areas recommended for Wilderness will be managed in accordance with the Wilderness Act of 1964 as amended." As such, Recommended/Proposed Wilderness areas on the Plumas National Forest are closed to motorized use and managed to a Recreation Opportunity Spectrum of non-motorized, semi-Primitive. It is unlawful to allow motorized OSV-use in Recommended (Proposed) Wilderness areas on the Plumas National Forest. <br> The 2001 Roadless Area Final Rule defines the following features that often characterize inventoried roadless areas: High quality or undisturbed soil, water, and air; Sources of public drinking water; Diversity of Plant and animal communities; Habitat for threatened, endangered, proposed, candidate, and sensitive species for those species dependent on large, undisturbed areas of land; Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation; Reference landscapes; Natural appearing landscapes with high scenic quality; Traditional cultural properties and sacred sites; and Other locally identified unique characteristics. The purpose of the 2001 Roadless Area Final Rule was to provide, within the context of multipleuse management, lasting protection for IRAs with the NFS. The 2001 Roadless Area Final Rule includes two categories of prohibitions: (1) Prohibition on road construction and road reconstruction in inventoried roadless areas (36 CFR 294.12); and (2) Prohibitions on timber cutting, sale, or removal in IRAs (36 CFR 294.13). <br> The commenter is correct, that as written, the 2001 Roadless Area Final rule does not categorically restrict OSV travel or other motorized/mechanized transport in these areas. However, the Forest Service does have a responsibility to analyze and disclose any potential impacts that our proposed OSV-designations may have on the resources or features that are often present in and characterize IRAs. Refer to the FEIS, pages 112, 123, 130, 137, and 143 for analyses and findings specific to Inventoried Roadless Areas. <br> The Travel Management Regulations set forth designation criteria that are to guide the responsible official's designation of areas and trails for OSV use (see 36 CFR $\S 212.55(\mathrm{a}-\mathrm{e} 1)$ and are found in the FEIS, appendices D and E. These criteria delineate certain elements and resources, the effects on which the responsible official must consider. |


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| Potential Fatal Flaws (continued) |  | The Travel Management Regulations describe the general designation criteria (36 CFR 212.55(a)) as follows: <br> In designating National Forest System roads, National Forest System areas and trails on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System 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. <br> The Travel Management Regulations describe the specific designation criteria (36 CFR 212.55(b)) as follows: <br> In addition to the criteria in paragraph (a) of this section, in designating National Forest System areas and trails on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: <br> 1. Damage to soil, watershed, vegetation, and other forest resources; <br> 2. Harassment of wildlife and significant disruption of wildlife habitats; <br> 3. Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and <br> 4. Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. <br> In addition, the responsible official shall consider: <br> 5. Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors. <br> Additionally, 36 CFR 212.55(d) requires the responsible official to recognize <br> 1. Valid existing rights; and <br> 2. The rights of use of National Forest trails of access in designating trails and areas for OSV use. <br> And 36 CFR 212.55(e) provides that: <br> National Forest System trails, and areas on National Forest System lands in wilderness areas or primitive areas shall not be designated for motor vehicle use...unless, in the case of wilderness areas, motor vehicles use is authorized by the applicable enabling legislation for those areas. <br> To apply the minimization criteria (36 CFR 212.55(b)(1-4)) and the other specific criteria for designating trails and areas for OSV use ("Specific Designation Criteria")(36 CFR 212.55(b)(5); (d); and e)), the Forest Service conducted a minimization criteria screening exercise that included four steps. Chapter 2 of the FEIS provides a more detailed description of the minimization criteria screening exercise. |


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| Potential Fatal Flaws (continued) |  | The screening exercise was applied to the existing network of OSV trails, including groomed and ungroomed, additional trails proposed during public comment periods, and for NFS lands that received adequate snow. Results of this exercise helped identify potential impacts and conflicts that may occur as a result of designating OSV trails and areas. The exercise resulted with the OSV trails and areas proposed in one or more action alternatives or eliminated from proposed designation. <br> The 1988 Plumas National Forest Land and Resource Management Plan was developed under the 1982 Planning Rule. Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, level of resource production and management, and the availability and suitability of lands for resource management (1982 Planning Rule, section 219.1(b)). The forest plan shall contain four parts, one of which is "(c) Multipleuse prescriptions and associated standards and guidelines for each management area including proposed and probable management practices...." (1982 Planning Rule, section 219.11). <br> The Plumas National Forest Land and Resource Management Plan identifies Forest goals and policies for recreation as follows (page 4-3): <br> 1a. Provide for a variety of forest-related recreation, and coordinate recreation with other resource use through the Recreation Opportunity Spectrum system. Encourage growth of privately-operated facilities serving public needs. Improve and expand developed facilities and trails to meet demand while reducing unit costs and protecting other resources. <br> Complete acquisition of Wild and Scenic River lands and easements. Minimize conflicts between various recreational users. <br> Manage selected unroaded areas to provide for semi-primitive opportunities. <br> 1b. Allow use of off-road vehicles wherever user conflicts or unacceptable resource damage are unlikely. <br> Provide separate ORV routes wherever conflicting uses are substantial. Because the Plumas National Forest Land and Resource Management Plan (PNF LRMP) was completed in 1988, the minimization criteria of the 2005 and updated 2015 Travel Management Rule were considered as an overlay to the goals, policies, standards, and guidelines of the PNF LRMP. Forest Plan amendments are required for actions that exceed the standard and guideline thresholds, not for activities that are within that threshold. For example, if oversnow vehicles (or ORVs) were not allowed in a specific area as identified in the 1988 PNF LRMP and this project proposed to designate an area or trail for OSV that is currently prohibited, a Forest Plan amendment would be required. However, when snowmobiles are allowed by the PNF LRMP, and this project proposes to not designate snowmobile use, there is no requirement for a forest plan amendment because the use is within the threshold. |


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| Potential Fatal Flaws (continued) |  | Rx-8 Semi-Primitive Area Prescription is described in the PNF LRMP on page $4-88-4-90$. The description of $R x-8$ states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow nonmotorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area. The prescription applies to the following roadless areas: Bald Rock, Beartrap, Chips Creek, Dixon Creek, Grizzly Ridge, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak" (PNF LRMP, page 4-88). General direction includes "provide a non-motorized experience (1a)" and standards and guidelines state "allow no motorized travel except over-the-snow and management access" (PNF LRMP, p.4-88). Semi-Primitive Area Prescription (Rx-8) of the 1988 Plumas National Forest Land and Resource Management Plan (LRMP) was not recommended for designation in open areas to minimize effects to the semi-primitive nature of $R x-8$. The Semi-Primitive Prescription description in the LRMP emphasizes non-motorized recreation and states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area" and applies to a total of 79,500 acres of NFS land (page 4-88). <br> The 1988 LRMP considered specific standards and guidelines for the Lakes Basin Management Area and states "Allow motorized over-the-snow travel, but consider restricting to designated areas if conflicts develop with other users or resources" (page 4-324). The NFS lands proposed for designated open areas for OSV use is a result of minimization criteria evaluation and consideration of public comments specific to the Lakes Basin area and site specific comments around uses, conflicts, and resource concerns. <br> Based on comments received during public comment periods, the open area in Lakes Basin was modified. The modified open area proposed for designation is from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and follows a ridge toward Graeagle Lodge. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. The Plumas National Forest Environmental Impact Statement (EIS) for the Land and Resource Management Plan discussed semi-primitive areas in the context of the existing condition and affected environment for each alternative considered. Focusing on the existing condition for recreation resources the |


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| Potential Fatal Flaws (continued) |  | EIS for the LRMP states "Due to the extensive PNF road system, no "primitive" areas and only 12 "semi-primitive" areas over 2,000 acres each remain on the Forest. One, the Bucks Lake Wilderness, is discussed in the later section Wilderness. The others are described in appendix L [of the EIS]. In addition to the Bucks Lake Wilderness and the Wild and Scenic River, about 115,000 acres (or $9.9 \%$ of the Forest) are free from motorized use, and 7,000 acres ( $0.6 \%$ of the Forest) contain only 4WD [4 wheel drive] trails. All of the areas except Dixon Creek have high scenic value due to their distinctive landscape" [EIS for the LRMP, (11), page 3-27]. <br> It is also worth noting that in 1988 the EIS for the LRMP stated that "Crosscountry skiing is the fastest growing dispersed recreation activity on the Forest" (EIS for the LRMP, (f), page 3-31). The EIS for the LRMP further explained "Existing demand conflicts would require resolution, including: (3) Snowmobiling vs. cross-country skiing, within 1-2 miles of points of departure" (EIS for the LRMP, p.32). <br> Focusing on the affected environment for recreation resources and consequences common to all alternatives, the EIS of the LMRP states "Although areas closed to wheeled vehicles would vary considerably by alternative, topography in fact makes most of the Forest inaccessible. Since the vast majority of the accessible Forest would be open in all alternatives, the needs of the many small ORV groups and individual ORV recreationists should be met even in the absence of semi-primitive ROS class allocations. Certain new closures would occur, frustrating some individuals." Under the preferred alternative that was selected in the Record of Decision, "About 79,500 acres ( $6.8 \%$ of Forest total acreage) would be retained as semi-primitive areas. Nevertheless, the Forest's present capacity to meet semi-primitive demand would be largely utilized by 2000" (EIS of the LRMP, page 4-10). <br> Appendix $L$ of the EIS for the LRMP includes areas considered for semiprimitive management (EIS for the LMRP, pages L-1-L-41). This appendix described the semi-primitive areas on the Plumas as defined by the Recreation Opportunity Spectrum (larger than 2,500 acres). Semi-primitive areas considered in the preferred alternative include: Adams Peak, Bald Rock, Beartrap, Bucks Creek, Chips Creek, Dixon Creek, Grizzly Peak, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak. |


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| Potential Fatal Flaws (continued) |  | The 1988 PNF LRMP was appealed by several entities-in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. <br> Prohibiting OSV use within Rx-8 is within the responsible official's discretion and does not require a forest plan amendment. A forest plan amendment is not required because prohibition of OSV use does not impact $R x-8$ areas beyond the limits of the LRMP analysis. Prohibiting OSV use in $R x-8$ is within the analysis framework considered in the LRMP, does not exceed the uses proposed in the LRMP, and is within the Responsible Official's discretion. Further, this prohibition is supported by "activities are permitted only if they are unobtrusive and maintain the character of the area", which was considered during minimization criteria evaluation. A forest plan amendment is not required by prohibiting OSV use in Rx-8 areas. This logic and conclusion applies to all areas of the Forest where the 1988 PNF LRMP currently allows OSV use and this project recommends prohibition of OSV use. <br> In the context of this project and OSV use designations, a forest plan amendment is required when OSV use is proposed in areas where the LRMP prohibits or restricts OSV use. For example, under the Bald Eagle Habitat Prescription ( $\mathrm{Rx}-11$ ) the LRMP states "close the areas to ORVs" (OSV are included in the definition of ORV, see LRMP EIS, Glossary, Definitions, page 29). Allowing OSV use in $R x-11$ exceeds the limits of the analysis in the LRMP. Allowing OSV use in $\mathrm{Rx}-11$ is not within the analysis framework considered in the LRMP, exceeds the uses proposed in the LRMP, is not within the Responsible Official's discretion, and would require a forest plan amendment using the 2012 Planning Rule regulations. <br> Bald eagles are protected under the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act. Plumas LRMP (1988) Bald Eagle Habitat Prescription ( $\mathrm{Rx}-11$ ) includes the following: Limit recreation use in bald eagle habitat, 4-96); Close the areas to ORV use (4-96); Preclude development of recreation facilities within the nesting territories (4-96). Between November 1 and March 31, limit activities within winter roost habitat to minimize disturbance (4-97). Consistent with Forest Plan ( $R x-11$ ), bald eagle nesting territories would not be designated for cross-country OSV use. Pass-through only travel on designated OSV trails would be allowed in these areas. Limiting OSV travel to the trail only within (and adjacent to) eagle territories would likely mitigate potential adverse effects to eagles (FEIS, appendix D). |


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| Potential Fatal Flaws (continued) |  | Prohibiting OSV use within congressionally designated roadless and inventoried roadless areas resulted from minimization criteria evaluation. Although the 2001 Roadless Rule established prohibitions on road constructions, road reconstruction, and timber harvesting in inventoried roadless areas on NFS lands, the intent of the final rule is to provide lasting protection for inventoried roadless areas within the NFS in the context of multiple use management (Special Areas; Roadless Area Conservation, Federal Register, volume 66, number 9, page 3244). Roadless areas often provide outstanding dispersed recreation opportunities, mechanized means of travel is often allowed. These areas can often take pressure off heavily used wilderness areas by providing solitude and quiet, dispersed recreation opportunities (Ibid, page 3245). Further, most of the Inventoried Roadless Areas resulting from the 2001 Roadless Rule were considered under the then current direction during the development of the 1988 Plumas National Forest Land and Resource Management Plan. Generally IRAs overlay with semiprimitive areas. Prohibiting OSV use within IRAs and Semi-Primitive Prescription ( $\mathrm{Rx}-8$ ) was to "maintain the character of the area". <br> The Record of Decision for the LRMP states "about 9 percent of the PNF will be managed for semi-primitive and primitive recreation as provided by roadless areas, wild and scenic rivers, and Wilderness. As cross-country skiing and snowmobiling increase, a high priority will be placed on managing and coordinating these sometimes conflicting uses" (page 3). "The Semi-Primitive Prescription (Rx-8) permits limited management activities...to take place in these areas provided that the semi-primitive nature of the area is protected. Opportunities are available for activities such as hiking and walking, horseback riding, viewing scenery, camping, hunting, nature study, mountain climbing, swimming, fishing, cross-country skiing and snowshoeing" (page 5). When considering public comments around "Semi-Primitive Roadless" designation for the LRMP and drafting the ROD, "the title of the prescription for management of these areas has been changed from Semi-Primitive NonMotorized to Semi-Primitive. Language has also been inserted into the SemiPrimitive Prescription ( $\mathrm{Rx}-8$ ) that would permit limited management activities to take place in these areas providing the semi-primitive nature of the areas is protected" (page 11). <br> The ROD for the LRMP clarifies "the only Semi-Primitive Motorized Area (SPM) on the Forest in the FEIS is Adams Peak (7,000 acres). Accordingly the SPM designation has been dropped in the Plan, even though motorized use will still be allowed to occur" (page 11). This helps explain why the title of designation in the LRMP reads as "Semi-Primitive" Prescription, emphasized non-motorized uses, and does not include a "non-motorized" or "motorized" descriptor in the title. |


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| Potential Fatal Flaws (continued) |  | The 1988 PNF LRMP was appealed by several entities; in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. <br> An agreement between appellants and the Plumas National Forest resulted in the Plumas National Forest considering all rivers and river segments on the Plumas National Forest, and identified several river segments as "eligible" for Wild and Scenic River designation. An agreement between the appellants and the Plumas National Forest included a commitment for "planned Forest Service management activities within $1 / 4$ mile of each bank of the river or stream will be consistent with the direction for Wild and Scenic rivers until eligibility and river classification is determined". Eligible rivers and river segments that included wild zones were not proposed for OSV designations because "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" (Public Law 90-542Oct. 2, 1968, page 907). A quarter mile buffer was placed around eligible wild and scenic river segments, specifically those with wild zones, and not included for OSV use designations during minimization criteria evaluation to maintain the "shorelines essentially primitive and waters unpolluted". <br> The 1988 LRMP contains opportunities for management change for the recreation resources. One of these identified opportunities is to "develop parking and sanitation facilities for cross-country skiers and snowmobilers and resolve conflicts between them" (page 3-6). In areas of high motorized and nonmotorized use such as Bucks Lake and Lakes Basin, and for the purposes of OSV use designations, areas that receive adequate snow, an opportunity for management change was identified. Coupled with public comments that include displacement of non-motorized users because of motorized uses it is the Responsible Official's requirement to consider the effects with the objective of minimizing "conflicts between motor vehicle use and existing or proposed recreational uses of NFS lands..." (36 CFR 212.55(b)). <br> The Travel Management Rule, Subpart C-Over-Snow Vehicle Use, states "...over-snow vehicle use on NFS roads, trails, and in areas on NFS lands shall be designated by the Responsible Official..." (26 CFR 212.81(a)). Open flowing water, lakes, streams, rivers, creeks, etc. even when frozen are |


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| Potential Fatal Flaws (continued) |  | prohibited from OSV use for safety and water quality (FEIS, appendices C and D). The purpose of this project is to designate NFS lands for OSV use, not open flowing or frozen water bodies. <br> The communities of Portola and Greenville receive their municipal water supply from Lake Davis and Round Valley Reservoir, respectively. The last Chance Creek Water District and Mill Race provide municipal water supplies to Sierra Valley and Taylorsville from Frenchman Lake and Indian Creek, respectively. The Federal Energy Regulatory Commission (FERC) developed a safety signage at hydroelectric projects document in October 2001. Commission staff inspects approximately 2,600 hydroelectric facilities each year. The objective is to identify potential hazards and require that appropriate safety measures be in place, before accidents occur. Each projects plan to address these potential dangers, through the use of signed and other devices is unique (page 5). <br> Pacific Gas and Electric Company and California Department of Water Resources administered reservoirs authorized by FERC post signs allowing or prohibiting access onto and across frozen reservoirs. These bodies of water are not necessarily Forest Service jurisdiction and therefore cannot be designated as NFS open areas for OSV use. <br> The Recreation Opportunity Spectrum is a system used to divide the Forest into recreational opportunity areas based on area size, distance from roads, and degree of development. Existing and potential recreation activities are identified within each to guide future management. Categories range from "primitive" to "urban". This system is based on the ROS User Guide, USDA Forest Service, which is available at <br> https://docs.google.com/file/d/0B1wq3f66mAw MmJFdzRiLXFGODA/edit (EIS for the LRMP, Appendix J). <br> The Recreation Opportunity Spectrum User Guide handbook chapter serves as a guide for the recreation resource input to the Land and Management Planning (creation, revision, or supplementation of a Forest Plan). It incorporate the ROS as the basic framework for inventorying, planning, and managing the recreation resource in accordance with the Forest and Rangeland Renewable Resources Planning at of 1974 (RPA), as amended by the National Forest Management Act of 1976 (NFMA). |


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| Potential Fatal Flaws (continued) |  | For management and conceptual convenience possible mixes or combinations of activities, settings, and probable experience opportunities have been arranged along a spectrum, or continuum. This continuum is called the Recreation Opportunity Spectrum (ROS) and is divided into six classes. The six classes, or portions along the continuum, and the accompanying class names have been selected and conventionalized because of their descriptiveness and utility in Land and Resource Management Planning and other management applications. The Recreation Opportunity Spectrum provides a framework for defining the types of outdoor recreation opportunities the public might desire, and identified that portion of the spectrum a given National Forest might be able to provide. The six categories are: primitive; semi-primitive non-motorized; semi-primitive motorized; roaded natural; rural; and urban. <br> Planning for recreation opportunities using the ROS is conducted as part of the Land and Resource Management Planning. The recreation input includes factors such as supply and demand, issues and identification of alternative responses to those issues which the planner must assess in order to develop management area prescriptions designed to assure the appropriate recreation experience through setting and activity management on the Forest. Land and Resource Management Planning assures that National Forest System lands provide a variety of appropriate opportunities for outdoor recreation (Forest Service Manual 2303.2). Each Forest need not provide an entire array of opportunities, but collectively the National Forest System will provide this variety. <br> In the Land and Resource Planning process the goals and objectives selected for a specific area (management area) achieved through the implementation of management prescriptions. Prescriptions are closely integrated sets of specific management practices scheduled over the entire planning period or portions of the planning period. Most acres within a planning area have the inherent capability, to some degree, to provide recreation opportunities and experiences. Therefore management prescriptions for each management area should include consideration for recreation use. <br> This information is disclosed in the ROS User Guide (USDA Forest Service, 1982). <br> ROS classes were used to develop management prescriptions and therefore influenced the planning process when developing management prescriptions. Management prescriptions do not trump ROS classes, rather they are integrated. The Plumas National Forest Land and Resource Management plan often states "manage lands within" [this prescription] "according to their appropriate Recreation Opportunity Class" (page 4-68 for one example). |


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| Designating Areas Larger than a Ranger District | The proposed Antelope, Frenchman, and Davis OSV use areas are not discrete detached from others; separate; distinct; discontinuous. As proposed, these interconnected areas create an OSV use area that is larger than a ranger district. As configured, the proposed OSV use areas in the DEIS are not in compliance with Travel Management Regulations - Subpart C. By dividing a large open area into smaller but adjacent subareas, the DEIS is attempting to circumvent or ignore the requirement on the size of open areas that is an explicit part of the Travel Rule. | The process by which the interdisciplinary team designated OSV-use areas is described in Chapter 3 of the FEIS, Affected Environment and Environmental Consequences, under Areas Considered for OSV Use Designation. The Plumas National Forest Land and Resource Management Plan (Plumas LRMP, USDA Forest Service 1988), did not establish designated OSV use areas. However, for this planning effort, the Plumas National Forest delineated seven discrete areas considered for OSV use designation, within the administrative boundaries of the Plumas National Forest. Each area considered for OSV use is smaller than a Ranger District, consistent with 36 CFR 212.1 of Subpart C of the Final Travel Management Rule. <br> The seven areas were reviewed for consistency with the Travel Management Rule's designation criteria (36 CFR 212.55). The documentation of that review is captured in appendices B and C of the FEIS. An area as defined in the Travel Management Final Rule at 36 CFR 212.1 states that, "An area is a discrete, specifically delineated space that is smaller, and except for OSV use, in most cases much smaller than a Ranger District." The seven OSV-use areas designated in alternative 2 are smaller than all ranger districts on the Plumas National Forest, ranging in size from 34,335 acres to 263,957acres. Each OSVuse area's acres are summarized in Table S-2. The OSV-use areas are primarily bounded by ridge tops, roads, or other geographic features that allow each area to be readily distinguished. They are also defined by their proximity to access points and other types of winter recreation. OSV use areas are depicted on Figures 1-5, Appendix A, volume II of this FEIS. <br> Specific to ensuring there is discrete segregation between the Antelope, Frenchman, and Davis OSV-use areas, there are natural topographic features between the Antelope, Frenchman, and Davis OSV use areas that the Forest Service used to designate these boundaries. NFS road 29N43 was proposed as the main boundary between Antelope and Frenchman OSV use areas because Indian Creek along NFS Road 29N43 provides a natural discreet boundary line for much of the boundary. The only locations OSV users can feasibly cross the creek along the majority of the boundary line is at Antelope Dam and Babcock Crossing. There are also natural topographic features between the Frenchman and Davis OSV use areas, Plumas County Road 111 and Red Clover Creek provide a natural boundary between these two OSV use areas, since Red Clover Creek is a steep drainage until it hit intersects with Red Clover Valley on private land, then private land is a natural physical segregation between these two OSV use areas. The only locations where OSV users could feasibly cross between the Davis and Frenchman OSV use areas is I Red Clover Valley (on private land), or closer to Lake Davis near Crocker Campground. |


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| Staging Areas - DEIS Failures | Comments related to staging areas/parking lots and the DEIS failure to address these. Specific comments related to the Lakes Basin Ski Trail (54-5, 161-12) Comments related to a change in the ability to transport OSVs and access areas via hybrid vehicles and uses. | The Plumas National Forest Over-snow Vehicle Use Designation Project is not intended to be a comprehensive, holistic winter recreation planning effort. The decision resulting from this analysis would designate areas and trails for public OSV use in accordance with Subpart C on the Plumas National Forest. (FEIS page 6). <br> Several alternative components were suggested, but were eliminated from detailed study. One suggestion was to review and update parking and staging facilities for OSV access. Expand both the Lakes Basin and the La Porte Staging Areas. The rational for not considering this suggestion is as follows: The purpose and need for action is to provide a manageable, designated OSV system of areas and trails that is consistent with and achieves the purposes of the Forest Service Travel Management Rule at 36 CFR part 212. The creation or addition of new parking areas and staging facilities at trailheads is beyond the scope of this project. (FEIS page 50) |
| Minimization Criteria | The Forest Service's approach relies too heavily on potential future mitigation actions, many of which depend on uncertain future monitoring, lack specificity and clear triggers for implementation, are unenforceable, and lack demonstrated effectiveness in reducing impacts. Rather than locating the areas to minimize impacts, the Forest Service skips that step and instead identifies measures to manage OSV use to minimize likely impacts. DEIS Appendix D (Mitigations for Designated Areas) and $E$ (Mitigations for Designated Trails). The Forest Service may not rely on potential future mitigation measures and other generalized statements to demonstrate compliance with the minimization criteria. | Thank you for your comment. <br> To apply the minimization criteria (36 CFR 212.55(b)(1-4)) and the other specific criteria for designating trails and areas for OSV use ("Specific Designation Criteria")(36 CFR 212.55(b)(5); (d); and e)) the Forest Service conducted a minimization criteria screening exercise that included four steps (FEIS, Chapter 1). Chapter 2 of the FEIS provides a more detailed description of the minimization criteria screening exercise. The screening exercise was applied to the existing network of OSV trails, including groomed and ungroomed, additional trails proposed during public comment periods, and for NFS lands that received adequate snow. Each trail and open area was considered individually, as a discrete and unique trail and open area. The final step of the screening exercise resulted in a designation recommendation and in some cases the recommendation was to not designate the trail and/or NFS lands as designated open area. This was a granular, site specific consideration before proposing trails and open areas for designation. <br> Aggregating roads and trails in the effects analysis was considered granular given that minimization criteria evaluation was complete, and the existing and proposed trail networks are distinct among each other, separate in space, exist in unique locations of the Forest, and are not interconnected with one another. The Plumas National Forest has 4,482 miles of NFS roads and motorized trails. Alternative 4 considered the largest amount of miles of OSV trail designation ( 750 miles) which is less than 17 percent of all NFS roads and motorized trails on the Forest. In contrast, alternative 5 considered the smallest amount of miles of OSV trail designation ( 200 miles) which is less than 4 percent of all NFS roads and motorized trails on the Forest. Given the |


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| Minimization Criteria (continued) |  | amount of proposed OSV trails in relation to the total amount of roads and motorized trails on the Forest, 4-17 percent is granular in nature. Site specific analysis and/or discussions were provided when there was a particular sensitive resource or concern area. This further provides a granular analysis for specific trials where a granular analysis is warranted. Aggregated roads and trails effects were common among the aggregation and did not warrant further granular analysis. |
| Inventoried Roadless Areas General | General comments regarding the DEIS and IRAs. | Inventoried Roadless Areas <br> The 2001 Roadless rule prohibits road construction and road re-construction in inventoried roadless areas ( 36 CFR 294.12) and prohibits timber cutting, sale, or removal in inventoried roadless areas (36 CFR 294.13). There are no prohibitions against allowing motorized use within IRAs in the Roadless Rule. The FEIS cites the Roadless Rule which defines the roadless area characteristics at 36 CFR 294.11: <br> (1) High quality or undisturbed soil, water, and air; (2) Sources of public drinking water; (3) Diversity of plant and animal communities; (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land (5) Primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation; (6) Reference landscapes; (7) Natural appearing landscapes with high scenic quality; (8) Traditional cultural properties and sacred sites; and (9) Other locally identified unique characteristics <br> The FEIS discloses impacts to the roadless characteristics of 1 ) undisturbed soil, water, and air (short-term impacts to air quality due to the presence of OSV exhaust), and (2) solitude (due to the sights and sounds of OSVs) (FEIS page 56 , summary table and throughout the recreation analysis). <br> Although not specifically aggregated under the Inventoried Roadless Area heading, the FEIS addresses potential impacts to air quality, hydrology, soils, terrestrial wildlife, aquatics, botany and cultural resources for each of OSV areas proposed for designation, including those portions of IRAs that are proposed for OSV designation. <br> Appendices D and E of volume II of the FEIS disclose area and trail analysis for minimization criteria (b)(3) Minimize conflict between motor vehicle use and existing or proposed recreational uses of NFS lands or neighboring Federal lands, documentation for potentially affected IRA is included. Due to the temporal nature of OSV use and the lack of on-the-ground imprints after snow melt, designating where OSVs could operate on the Plumas NF would not preclude any area from being considered as wilderness in the future. |


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| Inventoried Roadless Areas General (continued) |  | Wilderness Inventory under the 2012 Planning Rule and Citizen's Wilderness Inventory <br> The Wilderness Inventory process under the 2012 Planning Rule (FSH 1909.12 - 70 Wilderness) includes the following inventory criteria: Include an area in the inventory when: <br> 1. The area meets the size criteria defined in section 71.21 and has no improvements; or <br> 2. The area meets the size criteria defined in section 71.21 and is consistent with the improvements criteria defined in sections 71.22a and 71.22b. <br> Motorized OSV use over-snow, when snow depth is adequate for that use to occur would not be considered an improvement and would not degrade or disqualify the area for consideration in subsequent wilderness inventory processes. |
| Special Interest Areas (Land and Resource Management Plan Compliance) | Comments that indicate SIA designation does not supersede LRMP designations, since SIA's have undergone no formal analysis. | Without being specific to particular areas, the Plumas National Forest LRMP contains guidance to "Protect areas of unique scenic, botanic, or geologic value. Manage to protect the unique scenic, geologic, botanic, zoologic, or other special values. (Forest-Wide Standards and Guidelines, page 4-59)". The LRMP states that "of the nearly 100 potential SIA's on the PNF, 9 areas have significant geologic, botanic, or scenic area values". This does not preclude more of the potential SIA's having significant values as well. <br> The decision to not designate OSV use in some alternatives was not done solely for the protection of plant species. Other values, including wildlife habitat connectivity and non-motorized recreation interests were also addressed. |
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| Land and Resource Management Plan Consistency - Rx8 | Comments questioning if restricting OSV Use in Rx-8 is consistent with the current LRMP. Commenters feel strongly that it is not consistent with the current Plan and do not recognize that this decision would potentially amend that. | Thank you for your comment. <br> The Wilderness Act of 1964 as amended requires that "All National Forest lands within Congressionally designated Wilderness and areas recommended for Wilderness will be managed in accordance with the Wilderness Act of 1964 as amended." As such, Recommended/Proposed Wilderness areas on the Plumas National Forest are closed to motorized use and managed to a Recreation Opportunity Spectrum of non-motorized, semi-Primitive. It is unlawful to allow motorized OSV-use in Recommended (Proposed) Wilderness areas on the Plumas National Forest. |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | The 2001 Roadless Area Final Rule defines the following features that often characterize inventoried roadless areas: High quality or undisturbed soil, water, and air; Sources of public drinking water; Diversity of Plant and animal communities; Habitat for threatened, endangered, proposed, candidate, and sensitive species for those species dependent on large, undisturbed areas of land; Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation; Reference landscapes; Natural appearing landscapes with high scenic quality; Traditional cultural properties and sacred sites; and Other locally identified unique characteristics. The purpose of the 2001 Roadless Area Final Rule was to provide, within the context of multipleuse management, lasting protection for IRAs with the NFS. The 2001 Roadless Area Final Rule includes two categories of prohibitions: (1) Prohibition on road construction and road reconstruction in inventoried roadless areas (36 CFR 294.12); and (2) Prohibitions on timber cutting, sale, or removal in IRAs (36 CFR 294.13). <br> The commenter is correct, that as written, the 2001 Roadless Area Final rule does not categorically restrict OSV travel or other motorized/mechanized transport in these areas. However, the Forest Service does have a responsibility to analyze and disclose any potential impacts that our proposed OSV-designations may have on the resources or features that are often present in and characterize IRAs. Refer to the FEIS, pages 112-113, 120, 126, 133, and 143 for analyses and findings specific to Inventoried Roadless Areas. The Travel Management Regulations set forth designation criteria that are to guide the responsible official's designation of areas and trails for OSV use (see 36 CFR §212.55(a-e1) and are found in the FEIS, appendices D and E. These criteria delineate certain elements and resources, the effects on which the responsible official must consider. <br> The Travel Management Regulations describe the general designation criteria (36 CFR 212.55(a)) as follows: <br> In designating National Forest System roads, National Forest System areas and trails on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System 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. |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | The Travel Management Regulations describe the specific designation criteria (36 CFR 212.55(b)) as follows: <br> In addition to the criteria in paragraph (a) of this section, in designating National Forest System areas and trails on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: <br> 1. Damage to soil, watershed, vegetation, and other forest resources; <br> 2. Harassment of wildlife and significant disruption of wildlife habitats; <br> 3. Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and <br> 4. Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. <br> In addition, the responsible official shall consider: <br> 5. Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors. <br> Additionally, 36 CFR $212.55(\mathrm{~d})$ requires the responsible official to recognize: <br> 1. Valid existing rights; and <br> 2. The rights of use of National Forest trails of access in designating trails and areas for OSV use. <br> And 36 CFR 212.55(e) provides that: <br> National Forest System trails, and areas on National Forest System lands in wilderness areas or primitive areas shall not be designated for motor vehicle use ...unless, in the case of wilderness areas, motor vehicles use is authorized by the applicable enabling legislation for those areas. <br> To apply the minimization criteria ( 36 CFR 212.55 (b)(1-4)) and the other specific criteria for designating trails and areas for OSV use ("Specific Designation Criteria")(36 CFR 212.55(b)(5); (d); and e)), the Forest Service conducted a minimization criteria screening exercise that included four steps. Chapter 2 of the FEIS provides a more detailed description of the minimization criteria screening exercise. |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | The screening exercise was applied to the existing network of OSV trails, including groomed and ungroomed, additional trails proposed during public comment periods, and for NFS lands that received adequate snow. Results of this exercise helped identify potential impacts and conflicts that may occur as a result of designating OSV trails and areas. The exercise resulted with the OSV trails and areas proposed in one or more action alternatives or eliminated from proposed designation. <br> The 1988 Plumas National Forest Land and Resource Management Plan was developed under the 1982 Planning Rule. Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, level of resource production and management, and the availability and suitability of lands for resource management (1982 Planning Rule, section 219.1(b)). The forest plan shall contain four parts, one of which is "(c) Multipleuse prescriptions and associated standards and guidelines for each management area including proposed and probable management practices...." (1982 Planning Rule, section 219.11). <br> The Plumas National Forest Land and Resource Management Plan identifies Forest goals and policies for recreation as follows (page 4-3): <br> (1a) Provide for a variety of forest-related recreation, and coordinate recreation with other resource use through the Recreation Opportunity Spectrum system. Encourage growth of privately-operated facilities serving public needs. Improve and expand developed facilities and trails to meet demand while reducing unit costs and protecting other resources. <br> Complete acquisition of Wild and Scenic River lands and easements. <br> Minimize conflicts between various recreational users. <br> Manage selected unroaded areas to provide for semi-primitive opportunities. <br> (1b) Allow use of off-road vehicles wherever user conflicts or unacceptable resource damage are unlikely. <br> Provide separate ORV routes wherever conflicting uses are substantial. |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | Because the Plumas National Forest Land and Resource Management Plan (PNF LRMP) was completed in 1988, the minimization criteria of the 2005 and updated 2015 Travel Management Rule were considered as an overlay to the goals, policies, standards, and guidelines of the PNF LRMP. Forest Plan amendments are required for actions that exceed the standard and guideline thresholds, not for activities that are within that threshold. For example, if oversnow vehicles (or ORVs) were not allowed in a specific area as identified in the 1988 PNF LRMP and this project proposed to designate an area or trail for OSV that is currently prohibited, a Forest Plan amendment would be required. However, when snowmobiles are allowed by the PNF LRMP, and this project proposes to not designate snowmobile use, there is no requirement for a forest plan amendment because the use is within the threshold. <br> $\mathrm{Rx}-8$ Semi-Primitive Area Prescription is described in the PNF LRMP on page 4-88-4-90. The description of Rx-8 states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow nonmotorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area. The prescription applies to the following roadless areas: Bald Rock, Beartrap, Chips Creek, Dixon Creek, Grizzly Ridge, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak" (PNF LRMP, page 4-88). General direction includes "provide a non-motorized experience (1a)" and standards and guidelines state "allow no motorized travel except over-the-snow and management access" (PNF LRMP, p.4-88). Semi-Primitive Area Prescription (Rx-8) of the 1988 Plumas National Forest Land and Resource Management Plan (LRMP) was not recommended for designation in open areas to minimize effects to the semi-primitive nature of Rx-8. The Semi-Primitive Prescription description in the LRMP emphasizes non-motorized recreation and states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area" and applies to a total of 79,500 acres of NFS land (page 4-88). <br> The 1988 LRMP considered specific standards and guidelines for the Lakes Basin Management Area and states "Allow motorized over-the-snow travel, but consider restricting to designated areas if conflicts develop with other users or resources" (page 4-324). The NFS lands proposed for designated open areas for OSV use is a result of minimization criteria evaluation and consideration of public comments specific to the Lakes Basin area and site specific comments around uses, conflicts, and resource concerns. |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | Based on comments received during public comment periods, the open area in Lakes Basin was modified. The modified open area proposed for designation is from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and follows a ridge toward Graeagle Lodge. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. The Plumas National Forest Environmental Impact Statement (EIS) for the Land and Resource Management Plan discussed semi-primitive areas in the context of the existing condition and affected environment for each alternative considered. Focusing on the existing condition for recreation resources the EIS for the LRMP states "Due to the extensive PNF road system, no "primitive" areas and only 12 "semi-primitive" areas over 2,000 acres each remain on the Forest. One, the Bucks Lake Wilderness, is discussed in the later section Wilderness. The others are described in appendix L [of the EIS]. In addition to the Bucks Lake Wilderness and the Wild and Scenic River, about 115,000 acres (or $9.9 \%$ of the Forest) are free from motorized use, and 7,000 acres ( $0.6 \%$ of the Forest) contain only 4WD [ 4 wheel drive] trails. All of the areas except Dixon Creek have high scenic value due to their distinctive landscape" [EIS for the LRMP, (11), page 3-27]. <br> It is also worth noting that in 1988 the EIS for the LRMP stated that "Crosscountry skiing is the fastest growing dispersed recreation activity on the Forest" (EIS for the LRMP, (f), page 3-31). The EIS for the LRMP further explained "Existing demand conflicts would require resolution, including: (3) <br> Snowmobiling vs. cross-country skiing, within 1-2 miles of points of departure" (EIS for the LRMP, p.32). <br> Focusing on the affected environment for recreation resources and consequences common to all alternatives, the EIS of the LMRP states "Although areas closed to wheeled vehicles would vary considerably by alternative, topography in fact makes most of the Forest inaccessible. Since the vast majority of the accessible Forest would be open in all alternatives, the needs of the many small ORV groups and individual ORV recreation should be met even in the absence of semi-primitive ROS class allocations. Certain new closures would occur, frustrating some individual." Under the preferred alternative that was selected in the Record of Decision, "About 79,500 acres ( $6.8 \%$ of Forest total acreage) would be retained as semi-primitive areas. Nevertheless, the Forest's present capacity to meet semi-primitive demand would be largely utilized by 2000" (EIS of the LRMP, page 4-10). |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | Appendix $L$ of the EIS for the LRMP includes areas considered for semiprimitive management (EIS for the LMRP, pages L-1 -L-41). This appendix described the semi-primitive areas on the PNF as defined by the Recreation Opportunity Spectrum (larger than 2,500 acres). Semi-primitive areas considered in the preferred alternative include: Adams Peak, Bald Rock, Beartrap, Bucks Creek, Chips Creek, Dixon Creek, Grizzly Peak, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak. <br> The 1988 PNF LRMP was appealed by several entities-in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. <br> Prohibiting OSV use within Rx-8 is within the responsible official's discretion and does not require a forest plan amendment. A forest plan amendment is not required because prohibition of OSV use does not impact $\mathrm{Rx}-8$ areas beyond the limits of the LRMP analysis. Prohibiting OSV use in $R x-8$ is within the analysis framework considered in the LRMP, does not exceed the uses proposed in the LRMP, and is within the Responsible Official's discretion. Further, this prohibition is supported by "activities are permitted only if they are unobtrusive and maintain the character of the area", which was considered during minimization criteria evaluation. A forest plan amendment is not required by prohibiting OSV use in Rx-8 areas. This logic and conclusion applies to all areas of the Forest where the 1988 PNF LRMP currently allows OSV use and this project recommends prohibition of OSV use. <br> In the context of this project and OSV use designations, a forest plan amendment is required when OSV use is proposed in areas where the LRMP prohibits or restricts OSV use. For example, under the Bald Eagle Habitat Prescription ( $\mathrm{Rx}-11$ ) the LRMP states "close the areas to ORVs" (OSV are included in the definition of ORV, see LRMP EIS, Glossary, Definitions, page 29). Allowing OSV use in Rx-11 exceeds the limits of the analysis in the LRMP. Allowing OSV use in $\mathrm{Rx}-11$ is not within the analysis framework considered in the LRMP, exceeds the uses proposed in the LRMP, is not within the Responsible Official's discretion, and would require a forest plan amendment using the 2012 Planning Rule regulations. |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | Bald eagles are protected under the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act. Plumas LRMP (1988) Bald Eagle Habitat Prescription ( $\mathrm{Rx}-11$ ) includes the following: Limit recreation use in bald eagle habitat, 4-96); Close the areas to ORV use (4-96); Preclude development of recreation facilities within the nesting territories (4-96). Between November 1 and March 31, limit activities within winter roost habitat to minimize disturbance (4-97). Consistent with Forest Plan (Rx-11), bald eagle nesting territories would not be designated for cross-country OSV use. Pass-through only travel on designated OSV trails would be allowed in these areas. Limiting OSV travel to the trail only within (and adjacent to) eagle territories would likely mitigate potential adverse effects to eagles (FEIS, Appendix D). <br> Prohibiting OSV use within congressionally designated roadless and inventoried roadless areas resulted from minimization criteria evaluation. Although the 2001 Roadless Rule established prohibitions on road constructions, road reconstruction, and timber harvesting in inventoried roadless areas on NFS lands, the intent of the final rule is to provide lasting protection for inventoried roadless areas within the NFS in the context of multiple use management (Special Areas; Roadless Area Conservation, Federal Register, volume 66, number 9, page 3244). Roadless areas often provide outstanding dispersed recreation opportunities, mechanized means of travel is often allowed. These areas can often take pressure off heavily used wilderness areas by providing solitude and quiet, dispersed recreation opportunities (lbid, page 3245). Further, most of the Inventoried Roadless Areas resulting from the 2001 Roadless Rule were considered under the then current direction during the development of the 1988 Plumas National Forest Land and Resource Management Plan. Generally IRAs overlay with semiprimitive areas. Prohibiting OSV use within IRAs and Semi-Primitive Prescription (Rx-8) was to "maintain the character of the area". The Record of Decision for the LRMP states "about 9 percent of the PNF will be managed for semi-primitive and primitive recreation as provided by roadless areas, wild and scenic rivers, and Wilderness. As cross-country skiing and snowmobiling increase, a high priority will be placed on managing and coordinating these sometimes conflicting uses" (page 3). "The Semi-Primitive Prescription (Rx-8) permits limited management activities...to take place in these areas provided that the semi-primitive nature of the area is protected. Opportunities are available for activities such as hiking and walking, horseback riding, viewing scenery, camping, hunting, nature study, mountain climbing, swimming, fishing, cross-country skiing and snowshoeing" (page 5). |


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| Land and Resource Management Plan Consistency - Rx8 (continued) |  | When considering public comments around "Semi-Primitive Roadless" designation for the LRMP and drafting the ROD, "the title of the prescription for management of these areas has been changed from Semi-Primitive NonMotorized to Semi-Primitive. Language has also been inserted into the SemiPrimitive Prescription ( $\mathrm{Rx}-8$ ) that would permit limited management activities to take place in these areas providing the semi-primitive nature of the areas is protected" (page 11). <br> The ROD for the LRMP clarifies "the only Semi-Primitive Motorized Area (SPM) on the Forest in the FEIS is Adams Peak (7,000 acres). Accordingly the SPM designation has been dropped in the Plan, even though motorized use will still be allowed to occur" (page 11). This helps explain why the title of designation in the LRMP reads as "Semi-Primitive" Prescription, emphasized non-motorized uses, and does not include a "non-motorized" or "motorized" descriptor in the title. <br> The 1988 PNF LRMP was appealed by several entities; in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. <br> An agreement between appellants and the Plumas National Forest resulted in the Plumas National Forest considering all rivers and river segments on the Plumas National Forest, and identified several river segments as "eligible" for Wild and Scenic River designation. An agreement between the appellants and the Plumas National Forest included a commitment for "planned Forest Service management activities within $1 / 4$ mile of each bank of the river or stream will be consistent with the direction for Wild and Scenic rivers until eligibility and river classification is determined". Eligible rivers and river segments that included wild zones were not proposed for OSV designations because "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" (Public Law 90-542Oct. 2, 1968, page 907). A quarter mile buffer was placed around eligible wild and scenic river segments, specifically those with wild zones, and not included for OSV use designations during minimization criteria evaluation to maintain the "shorelines essentially primitive and waters unpolluted." |


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| Land and Resource |  | The 1988 LRMP contains opportunities for management change for the <br> Management Plan <br> Consistency - Rx8 <br> (continued) |
|  |  | recreation resources. One of these identified opportunities is to "develop <br> parking and sanitation facilities for cross-country skiers and snowmobilers and <br> resolve conflicts between them" (page 3-6). In areas of high motorized and <br> non-motorized use such as Bucks Lake and Lakes Basin, and for the purposes <br> of OSV use designations, areas that receive adequate snow, an opportunity for |
| management change was identified. Coupled with public comments that |  |  |
| include displacement of non-motorized users because of motorized uses it is |  |  |
| the Responsible Official's requirement to consider the effects with the objective |  |  |
| of minimizing "conflicts between motor vehicle use and existing or proposed |  |  |
| recreational uses of NFS lands..." (36 CFR 212.55(b)). |  |  |


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| Best Available Science - All Resource Areas | Comments regarding use of best available science use in the DEIS. | Thank you for your comment. <br> The references provided in written comments and exhibits to comments were considered. The analysis presented in Chapter 3 of the FEIS incorporates the best available science. |
| Impacts Due to OSV Use Lack of Documentation | The DEIS fails to adequately document referenced resource damage resulting from OSV use. The DEIS repeatedly refers to adverse resource impacts without providing evidence of such. The DEIS does not present adequate data to substantiate the restrictions imposed by alternative 3 and alternative 5 . <br> Likewise, the DEIS fails to adequately document referenced user conflicts and the fact that OSV travel has been occurring on the Plumas NF for decades without major user conflicts. | The analysis and consideration of environment impacts of the No Action and Action Alternatives, which consider a reasonable range of designations for OSV use per National Environmental Policy Act regulations (CFR 40 1502.1, 1502.2(e), 1504.14), are not limited to just natural resources, but also include social resources. The potential impacts to both the natural and social environments of the proposed alternatives, including the No Action Alternative are documented in Chapter 3 Affected Environment and Environmental Consequences in the DEIS and FEIS. Under the multiple-use principle (Multiple-Use Sustained-Yield Act of 1960) the Forest Service manages winter uses to protect National Forest System (NFS) resources and to provide a range of opportunities for motorized and non-motorized recreation. National forests should provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. The criteria for designating roads, trails, and areas for OSV use in the Final Travel Management Rule, 36 CFR 212 Subpart C (effective February 27, 2015) require the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts ( 36 CFR 212.55(b) and 212.81(d)). The discussion of the No Action Alternative for each resource area and the minimization criteria worksheets in appendices D and E further describe the current resource conditions and impacts relevant to the natural resources, as well as, user conflicts. |


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| Groomed Trails / Routes Future | We propose the following trails be approved for grooming, should funding become available in the future: 1 . Road 24 N 89 X in section 16, which the PNF recently acquired should be groomed to the west rather than continuing north toward the Wilderness, boundary, to prevent trespass. The current location is not an adequate tum around area. In SAC' s NOI comment letter we submitted the electronic data for the preferred location. This location would' benefit everyone, as there's a better turnaround area for OSV and it would no longer dead toward the Wilderness. 2. The Lower Bucks. Ungroomed Trail 24N24-toward Three Lakes should not be approved. There is a significant safety issue on that trail so use should not be encouraged. This would meet the Purpose and Need for safety. 3. Grizzly Forebay Ungroomed Trail 24N34A leads into a bald eagle area. The point on the road in the saddle of 24 N 34 : is windblown and very dangerous. If PG\&E needs this trail for their operations, it should added to their Special Use Permit But should not be designated for OSV public use. 4. The road from Four Trees warming hut to Walker Plains must be groomed continuing the county line, which is consistent with the Plumas Co Winter Road Closure map (attached). This is a county road and coordination must be done with Plumas Co. Dept of Public Works to allow this grooming. Walker Plains is a popular destination. legend SEE LETTER SUBMISSION: Maps on Page 15 of 181. The entire loop of the Sherman Bar Trait 24 N 28 , as mapped in our NOI comment letter proposal, should be available to groom if funding becomes available in the future. Please use the GIS data previously submitted by SAC | Alternative 2 of the FEIS has been modified to allow grooming on 24N33 beyond Chucks Rock to its intersection with FS Road 24N89X and 24N89XA (in Section 16). This change allows for not only a safe turn around for grooming equipment, but also protect wilderness resources, and continues to provide for motorized use already occurring in the area and allows OSV access to Bald Eagle Mountain. <br> Alternative 2 of the FEIS has also been modified to exclude ungroomed trails in cross-country OSV areas unless they provide connectivity for OSV use in a restricted area. Neither NFS Road 24N24 (leading towards Three Lakes) nor 24N34 (leading towards Grizzly Forebay) are included as ungroomed designated trails under the Alternative 2 of the FEIS. <br> PC 414 leads from Four Trees warming hut to Walker Plains and is outside of our jurisdiction. We cannot designate this road as an OSV trail nor propose to groom it. Walker Plains is on private land and is on the 414 road south of Four Trees. |


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| Access - Creating Barriers | The commenters contend that restrictions in some areas are creating barriers to accessing designated OSV areas. Some closures may seem insignificant, but are actually creating significant barriers to OSV. The following are problem areas that need to be resolved: 1. The area to the east of the Silver Lake Road is a part of a continuous barrier. The map in the DEIS makes it appear that there is OSV access to the area to the north and east of Silver Lake. However, what appears to be a small restriction creates a large barrier to adjacent areas that are currently used by OSV 2. 25N17 near the old Meadow Valley Lumber Co. mill is in the restricted area, so OSV cannot access the large area to the north. The attached letters refer to additional specific locations where this is occurring. County Road 401 to 25N18 (Taylor Rock area) and 25N42 to Brady's Camp, 25N29 and 25 N 29 B restrictions deny access to Argentine which is a popular OSV destination. These areas need to be kept open to OSV. | Alternative 2 of the FEIS has been modified in the area of Harrison Flat and NFS Road 23N10. In order to accommodate OSV connectivity on 23N10, the open area boundary has been redrawn to include the extreme eastern portion of NFS Road 23N10. This is an insignificant change for motorized uses, since the portion of SIA that would become open is extremely steep and densely vegetation, and would not likely receive much OSV use. <br> Alternative 4 considered designated PC 401 to 25N18 (Taylor Rock area), 25N42 to Brady's Camp, 25N29, and 25N29B for designation. However; Alternative 2 removed these trails from designation to protect botanical resources, and we did not designate any of these routes in any alternative. Alternative 2 of the FEIS strikes a balance between providing for motorized uses, but also protecting resources. <br> Roads within open OSV use areas on Mt. Claremont and Mt. Hough are accessible from Quincy by County Roads (County Road 403 and 208 access Mt. Hough area and 201 accesses Claremont). Designating county roads as OSV trails is not possible since they cannot be designated as NFS OSV trails, but these roads will be accessible per County authority. NFS Road 24N24 is not designated because there is no safe place to stage and not always snow covered down to Quincy, and the road is narrow for staging with vehicles and trailers with limited turn arounds. <br> Alternative 2 of the FEIS has also been modified to ensure OSV access is not restricted communities, including the area to the east of Silver Lake area and NFS Road 25N17 (Snake Lake area) and the open area to the north of the old Meadow Valley Lumber Co. mill. The area on the west side of Meadow Valley, near NFS road 24N30A, along the private land boundary and including NFS road 24N29X (Silver Lake Road) is now designated as open to OSV use under Alternative 2 of the FEIS. This allows access from private lands near Meadow Valley to NFS open areas allowing cross-country travel. |
| Non-traditional OSV Vehicles/Uses | Comments describing non-traditional, alternative motorized OSV vehicles. | Thank you for your comment. |
| Over-snow Vehicle Classes based on Width | The DEIS states that the Plumas must minimize conflicts between classes of vehicles. This is a remnant from subpart B of the TMR. Summer travel management and has no basis in winter OSV use. <br> Snowmobiles, snowbikes, groomers and tracked quads or side by sides do not conflict with one another. Therefore, there is no need or real justification to designate classes of OSV by width. | Thank you for your comment. <br> The Travel Management Rule, Subpart C-Over-Snow Vehicle Use, states "...over-snow vehicle use on NFS roads, trails, and in areas on NFS lands shall be designated by the Responsible Official...where snowfall is adequate for that use to occur, and if appropriate, shall be designated by class of vehicle and time of your..." (26 CFR 212.81(a)). In addition, the responsible official shall consider (5) Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors. In designating National Forest System roads, the responsible official shall consider: (1) Speed, volume, composition, and distribution of traffic on roads; and (2) Compatibility of vehicle class with road geometry and road surfacing (36 CFR 212.55 (a-c)). |


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| Over-snow Vehicle Classes based on Width (continued) |  | The definition of over-snow vehicle is "a motor vehicle that is designed for use over snow and that runs on a track or tracks and/or a ski or skis, while in use over snow" (36 CFR 212.1). Class 1 are over-snow vehicles 50 inches or less in width at the widest point on the vehicle; Class 2 are over-snow vehicles more than 50 inches in width at the widest point on the vehicle (FEIS, appendix K , page 529). <br> Water quality best management practices, specifically BMP number <br> "Recreation 7 Over-snow Vehicle Use", includes development of site-specific BMP prescriptions for the following practices "specify over-snow vehicle class suitable for the expected snowpack and terrain or trail conditions" (FEIS, appendix C, page 64). <br> Vehicle class was considered with regard to safety and likelihood of resource damage and vehicle class conflicts. Some proposed designated OSV trails do not accommodate all vehicle classes and allowing all vehicle classes on some designated OSV trails is unsafe due to visibility, snowpack, terrain, trail conditions, speed of OSVs, user skill, etc. Further, larger OSVs have an increased likelihood of compaction and are restricted to groomed trails. This is further supported by the unpredictable conditions of proposed designated open areas. <br> Vehicle class definitions were modified in the FEIS to base vehicle class on the ground pressure exerted by different types of OSVs to better align with potential resource impacts (as heavier vehicles create deeper tracks and can potentially cause resource damage). The revised Class 1 OSVs include those that typically exert a ground pressure of 1.5 pounds per square inch (psi) or less. This class includes snowmobiles, tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked utility terrain vehicles (UTVs), and snow-cats. The revised Class 2 OSVs include those that typically exert a ground pressure of more than 1.5 psi . This class includes tracked four-wheel drive (4WD) sport utility vehicles (SUVs) and tracked 4WD trucks. Class 1 OSVs will be able to operate on areas and trails designated for OSV use while Class 2 OSVs will be restricted to designated OSV trails available for grooming. |
| Over-snow Vehicle Classes (Support) | Comments in support of OSV vehicle classes. | No further action required. Position statement. |


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| $\begin{array}{l}\text { Over-snow - Rubber- } \\ \text { Tracked Vehicles }\end{array}$ | $\begin{array}{l}\text { Comments related to regulation rubber } \\ \text { tracked vehicles. }\end{array}$ | $\begin{array}{l}\text { Over-Snow Vehicles (OSVs) are defined as: A motor vehicle that is designed } \\ \text { for use over snow and that runs on a track or tracks and/or a ski or skis, while } \\ \text { in use over snow (36 CFR 212.1). The definition of vehicle class has been } \\ \text { updated for the FEIS. Class 1 OSVs include those that typically exert a ground } \\ \text { pressure of 1.5 pounds per square inch (psi) or less. This class includes } \\ \text { snowmobiles, tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked } \\ \text { utility terrain vehicles (UTVs), and snow-cats. The revised Class 2 OSVs } \\ \text { include those that typically exert a ground pressure of more than 1.5 psi. [CKA- } \\ \text { 1] This class includes tracked four-wheel drive (4WD) sport utility vehicles }\end{array}$ |
| (SUVs) and tracked 4WD trucks. Under alternative 2, Class 1 OSVs would be |  |  |
| able to operate on areas and trails designated for OSV use while Class 2 OSVs |  |  |
| would be restricted to designated OSV trails available for grooming. |  |  |$\}$


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| Analysis - Biased | The commenters contend that the exit surveys used in the analysis and the way information is presented in the DEIS biases the analysis/planning process toward nonmotorized uses. <br> I also question / challenge the use "Exit surveys". These under estimate the use of OSV. <br> The Plumas Forest Service (PNF) states that snowmobiles are potentially damaging soils, vegetation, water and etc. Also the words: "prohibited" appears 55 times, "restricted" appears 22 times, "destroy" appears 6 times, "rutting" appears 26 times and "damage" appears 225 times in the DESIS Volume I. Each of these words are aimed directly at the motorized community. "Damage is generally defined as physical harm that impairs value, usefulness, or normal function." DEIS on 22 This gives the impression that the OSV Community is destroying the PNF lands which could not farther from the truth. Its also interesting that the DEIS is either silent or an apparent proponent of non- motorized recreation on the PNF. This is discrimination against the OSV Community. | The designation criteria used to develop alternatives to designate or not designate trails and areas for OSV use are listed in the FEIS, page 2. The criteria for designation of roads, trails, and areas for OSV use in the Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts ( 36 CFR 212.55(b) and 212.81(d)). <br> Despite the commenter's assertion that the analysis was biased towards nonmotorized recreation, the selected alternative of the FEIS (Alternative 2) strikes an unbiased balance between providing for motorized and non-motorized uses, while protecting natural resources. <br> National Visitor Use Monitoring (NVUM) survey information was used as an overview of the recreation opportunities, visitor use, and trends within the analysis area. The NVUM surveys are part of national program that provides estimates of the volume of recreation visitation to National Forests and Grasslands, and produces descriptive information about that visitation, including activity participation, demographics, visit duration, measures of satisfaction, and trip spending connected to the visit. The established means by which the NVUM surveys are conducted is through "exit surveys". In addition to NVUM data, the interdisciplinary team used OSV registration numbers provided by California State Parks Off-Highway Vehicle Division, the agency that administers the State OSV program, to show general trends in OSV use across the forest, in combination with several other data sources. California State Parks, California Outdoor Recreation Plan, National Recreation Survey and the Environment information and online visitor information sources provided by the Forest Service and other local organizations and industry was used as an overview of the recreation opportunities, visitor use, and trends within the analysis area. |
| Travel Management Rule Size of Areas | We believe that Alternative 2 does not conform to Travel Management Regulations - Subpart C as adjoining proposed OSV use areas are not discrete and form an area larger than a ranger district; does not adequately minimize impacts to natural and cultural resources below 5,000 feet by allowing OSV use in areas that do not receive adequate snowfall to protect resource values; and does not protect Wilderness and Wild \& Scenic River values. | The process by which the interdisciplinary team designated OSV-use areas is described in Chapter 3 of the FEIS, Affected Environment and Environmental Consequences, under Areas Considered for OSV Use Designation. The Plumas National Forest Land and Resource Management Plan (Plumas LRMP, USDA Forest Service 1988), did not establish designated OSV use areas. However, for this planning effort, the Plumas National Forest delineated seven discrete areas considered for OSV use designation, within the administrative boundaries of the Plumas National Forest. Each area considered for OSV use is smaller than a Ranger District, consistent with 36 CFR 212.1 of Subpart C of the Final Travel Management Rule. |


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| Travel Management Rule Size of Areas (continued) |  | The seven areas were reviewed for consistency with the Travel Management Rule's designation criteria (36 CFR 212.55). The documentation of that review is captured in appendices $B$ and $C$ of the FEIS. An area as defined in the Travel Management Final Rule at 36 CFR 212.1 states that, "An area is a discrete, specifically delineated space that is smaller, and except for OSV use, in most cases much smaller than a Ranger District." The seven OSV-use areas designated in Alternative 2 are smaller than all ranger districts on the Plumas National Forest, ranging in size from 34,335 acres to 263,957acres. Each OSVuse areas' acres are summarized in Table S-2. The OSV-use areas are primarily bounded by ridge tops, roads, or other geographic features that allow each area to be readily distinguished. They are also defined by their proximity to access points and other types of winter recreation. OSV use areas are depicted on figures $1-5$, appendix A, volume II of this FEIS. <br> Specific to ensuring there is discrete segregation between the Antelope, Frenchman, and Davis OSV-use areas, there are natural topographic features between the Antelope, Frenchman, and Davis OSV use areas that the Forest Service used to designate these boundaries. NFS road 29N43 was proposed as the main boundary between Antelope and Frenchman OSV use areas because Indian Creek along NFS Road 29N43 provides a natural discreet boundary line for much of the boundary. The only locations OSV users can feasibly cross the creek along the majority of the boundary line is at Antelope Dam and Babcock Crossing. There are also natural topographic features between the Frenchman and Davis OSV use areas, Plumas County Road 111 and Red Clover Creek provide a natural boundary between these two OSV use areas, since Red Clover Creek is a steep drainage until it hit intersects with Red Clover Valley on private land, then private land is a natural physical segregation between these two OSV use areas. The only locations where OSV users could feasibly cross between the Davis and Frenchman OSV use areas is I Red Clover Valley (on private land), or closer to Lake Davis near Crocker Campground <br> A 5,000-foot elevation restriction was analyzed under Alternatives 3 and 5 . Alternative 2 of the FEIS considers designating areas above 3,500 feet. The process used by the Interdisciplinary team to identify an elevational restriction for OSV use in various alternatives is described in the FEIS in Chapter 2, under Alternative Development. The 3,500-foot elevation was used as a screening tool to narrow our efforts to NFS lands most likely to receive snowfall in adequate amounts to support OSV use. We took into account observed conditions at various elevations across the Forest (frequency of snowfall, longevity, and quality of snow conditions) where snowfall is adequate for OSV use to occur (36 CFR 212.81(a)). A complete description of how the elevation range was considered during development of alternatives can be |


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| Travel Management Rule Size of Areas (continued) |  | found in the FEIS in Chapter 2, under Alternative Development. Subpart C of the Travel Management Regulations require that, designated public OSV areas and trails shall be identified on a publicly available OSV-use map (OSVUM) [(36 CFR 212.81(c)]. Once issued, designations would be made enforceable under 36 CFR 261.14, which prohibits the possession or operation of an OSV on NFS lands other than in accordance with the Subpart designations, subject to the exceptions listed at 36 CFR 261.14(a-f). (FEIS Chapter 1, Travel Management Regulations). Areas that are designated for OSV use in the preferred Alternative (Alternative 2) would not be open to OSV use unless there is adequate snow, which would help ensure protection of underlying resources. The 2001 Roadless Rule allows motorized recreation within Inventoried Roadless Areas (IRAs), which is assumed this is what the commenter refers to as 'wilderness' in their comment. The Semi-Primitive Area Prescription ( $\mathrm{Rx}-8$ ) in the Plumas LRMP and IRAs (RARE 2) generally overlap. Under Alternative 5 OSV use was excluded from all Semi-Primitive Prescription areas ( $\mathrm{Rx}-8$ ) and IRAs; however, a few portions were placed back in for connectivity for historic OSV use. Under Alternatives 2 and 3, OSV use was not designated in the majority of these $\mathrm{Rx}-8$ prescriptions (Bald Rock, Dixon Creek, Grizzly Ridge, Middle Fork, Thompson Peak) and OSV use is only allowed in portions of Beartrap, Chips Creek, Keddie Ridge, and Lakes Basin Semi-Primitive Areas ( $\mathrm{Rx}-8$ ) to protect the semi-primitive and non-motorized characteristics. Alternative 2 has been modified within the FEIS in the Chips Creek SemiPrimitive Area to exclude the Indian Springs area near the Lassen NF border and extend the non-motorized area of east of Yellow Creek to NFS Road 26N26. There are three areas near the Lassen National Forest border proposed in the FEIS as still open to OSV (near Ben Lomond Peak, Chambers Peak and Tobin Ridges) to allow for continuity in motorized opportunities in those open OSV areas from the Lassen National Forest. In the Lakes Basin, OSV use is proposed in Alternative 2 within the Semi-Primitive prescription ( $\mathrm{Rx}-8$ ) at Upper Little Jamison to provide opportunities for both motorized and non-motorized opportunities. In Alternative 2, approximately half of the Lakes Basin Semi-Primitive Area Prescription ( $\mathrm{Rx}-8$ ) is open to OSV use in order to provide for access to motorized opportunities and OSV connectivity, while still protecting the semi-primitive characteristics in the other half of this area. |


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| Travel Management Rule - <br> Size of Areas (continued) |  | The Middle Fork of the Feather River is already designated as a Wild and <br> Scenic River under the Wild and Scenic Rivers Act, and OSV use is prohibited <br> under all alternatives. There is a large non-motorized buffer area surrounding <br> the entire Wild and Scenic designation on both sides which was already <br>  <br> 5 which protects outstanding values and primitive recreation settings of the |
|  |  | Middle Fork of the Feather River. Under Alternative 2, there is approximately <br> 13. <br> to miles of Eligible Wild river segments where OSV use is allowed adjacent |
|  |  | primitiver. recreation settings (FEIS, volume I Chapter 3. Affected Environment <br> and Environmental Consequences); however, OSV use is allowed in those |
| areas to provide connectivity for motorized uses and access to high-value OSV |  |  |
| areas where historic uses have occurred. OSV use is excluded from the Bucks |  |  |
| Lake Wilderness in all alternatives. |  |  |


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| Travel Management Rule Purpose and Need - Travel Management Rule (continued) | * Minimizes conflicts between different vehicle classes on NFS lands and neighboring Federal lands: DEIS does not document conflicts between different vehicle classes on NFS or adjacent Federal lands. * Is compatible with the existing conditions in populated areas (taking into account sound, emissions, and other factors): DEIS does not demonstrate existing conditions are not compatible regarding sound, emissions and other factors. <br> * In one part of the NOI they are described as existing and in another they are described as being proposed. If they are existing ski trails the analysis should already have been completed and, therefore, they need to be removed from the NOI. These ski trails need to be removed as they do not meet the Purpose or Need of the Notice of Intent. | Public OSV access is provided, to varying degrees, in all alternatives (FEIS, page 40). The no action alternative descriptions in Chapter 2 - Purpose and Need and Chapter 3 - Environmental Consequences discloses the baseline (existing conditions) information for each resource area, including: air quality (page 144), terrestrial wildlife (page 157), aquatics (page 212), botany, and cultural resources (page 384). As well, Chapter 3 - Recreation, recognizes that there are conflicts between non-motorized and motorized recreation users. As such, the EIS utilizes multiple indicators and measures to disclose potential impacts on different types (both motorized and non-motorized) of wintertime recreation opportunities (FEIS, volume I pages 136-142). |
| National Environmental Policy Act - Non-compliance | While the analysis in the DEIS provides a relatively thorough discussion of many of the impacts associated with OSV use, it fails to adequately analyze certain impacts, including disclosing site-specific baseline information, best available science, impacts to future wilderness recommendations, impacts to wildlife and habitat connectivity corridors, impacts of authorizing OSV use on trails within OSV areas, and the cumulative impacts of climate change and the OSV designations. | Site-specific baseline information is provided in the FEIS in Chapter 1 Alternative 1 - No Action (continued current management) (page xiii), in Chapter 2 - Alternative 1 - no action (page 29), and in Chapter 3 (page 73) as part of the description of the no action alternative for each resource area. The no action alternative reflects the current management activities related to snowmobile use on the Plumas National Forest, and represents the existing baseline condition or trends by which the action alternatives are compared. Baseline information for each resource by resource indicator is also provided in the comparison of alternatives table in Chapter 2 of the FEIS (Table 8, page 40). |


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| National Environmental Policy Act - Non-compliance (continued) |  | The Forest Service discloses the direct, indirect, and cumulative impacts of the OSV designations in the proposed action and alternatives in chapter 3 of the FEIS. These disclosures are based on the baseline information and best available science as referenced in this FEIS and individual specialist reports contained in the project record. Impacts to future potential wilderness recommendations are disclosed in Chapter 3 of the FEIS (volume I pages 111, $116,123,130,137,142$, and 143 . Impacts to wildlife and habitat connectivity corridors is discussed in chapter 3 of the FEIS - Terrestrial Wildlife (volume I page 162). Habitat connectivity is a resource indicator for the effects of the OSV designation on wildlife (volume I page 163). Habitat connectivity, specifically, is discussed volume I on pages $163,167,168,178,182,209$, and 213. Although trails available to OSV use occur within proposed designated OSV use areas, the Forest Service is not proposing to designate these trails for OSV use. Because this action is not considered as part of the proposal, it was not analyzed as part of this effort. The cumulative impacts of climate change and OSV designations are discussed in relation to multiple resource areas throughout the FEIS (volume I pages 118, 154, 159, 167, 206, 239, 254, 302, $304,349,350,359,367,375$, and 379). |
| Range of Alternatives | NEPA requires that the "EIS shall document the examination of reasonable alternatives to the proposed action."1 When we submitted our Alternative in 2015 we provided an indepth explanation of specific concerns related to OSV use on the PNF as well as details on a handful of areas that are extremely important to the non-motorized winter recreation community. These areas must not be designated for OSV use if the Forest Service is to minimize conflict between OSV use and other winter recreation use.[...] 136 CFR Section 220.5(e) | Thank you for your comment. <br> The citation 36 CFR 220(e) states "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. Since an alternative may be developed to address more than one significant issue, no specific number of alternatives is required or prescribed. The following procedures are available to the responsible official to develop and analyze alternatives: <br> (1) The responsible official may modify the proposed action and alternative(s) under consideration prior to issuing a draft EIS. In such cases, the responsible official may consider the incremental changes as alternatives considered. The documentation of these incremental changes to a proposed action or alternatives shall be included or incorporated by reference in accord with 40 CFR 1502.21. |


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| $\begin{array}{ll}\text { Range of Alternatives } \\ \text { (continued) }\end{array}$ |  | $\begin{array}{l}\text { 2) The proposed action and one or more alternatives to the proposed action } \\ \text { may include adaptive management. An adaptive management proposal or } \\ \text { alternative must clearly identify the adjustment(s) that may be made when } \\ \text { monitoring during project implementation indicates that the action is not having } \\ \text { its intended effect, or is causing unintended and undesirable effects. The EIS } \\ \text { must disclose not only the effect of the proposed action or alternative but also } \\ \text { the effect of the adjustment. Such proposal or alternative must also describe } \\ \text { the monitoring that would take place to inform the responsible official during }\end{array}$ |
| implementation whether the action is having its intended effect." |  |  |$]$


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| National Forest Management Act (continued) |  | Section 8(b) of the National Forest Management Act states, "any road constructed on land of the National Forest System in connection with a timber contract or other lease shall be designed with the goal of reestablishing vegetation cover on the roadway and areas where vegetation cover has been disturbed by the construction of the road, within ten years after the termination of the contract, permit, or lease." This section of the act further states, "Such action shall be taken unless it is determined that the road is needed for use as a part of the National Forest Transportation System." <br> This legal direction states that lands no longer needed for, and dedicated to, transportation or access uses should be returned to a vegetated state. Implicit in this legal direction is Forest Service responsibility to recover soil productivity on these lands, to the extent that vegetation can be re-established. Type and degree of soil recovery necessary for re-establishment of vegetation would depend on site-specific conditions and land management objectives for that area. <br> Section 8(c) of this act states "Roads constructed on National Forest System lands shall be designed to standards appropriate for the intended uses, considering safety, cost of transportation, and impacts on land resources." The National Forest Management Act prevents watershed conditions from being irreversibly damaged and protects streams and wetlands from detrimental impacts. Land productivity must be preserved. Fish habitat must support a minimum number of reproductive individuals and be well distributed to allow interaction between populations (FEIS, Appendix B, pages 23-24). The Endangered Species Act (ESA, 16 U.S.C. §1531 et seq. (1973)) is a means to conserve threatened and endangered plants and animals and the ecosystems they inhabit. The lead Federal agencies for implementing the ESA are the Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration (NOAA) Fisheries Service. The ESA requires Federal agencies, in consultation with the FWS and/or NOAA Fisheries Service, to ensure authorized actions are not likely to jeopardize the continued existence of any species listed under the ESA, or result in the destruction or adverse modification of designated critical habitat of such species. The law also prohibits any action that causes a "taking" of any listed species of endangered fish or wildlife. Likewise, import, export, interstate, and foreign commerce of listed species are all generally prohibited. The FEIS and associated Biological Assessment for this project provide regulatory framework, issues, measures and direction related to ESA compliance and presented analyses of potential project impacts to federally endangered, threaten and proposed species, as well as the Regional Forester's designated Sensitive Species, and the ecosystems they inhabit (including designated critical habitat). The Forest Service will complete consultation with FWS as required under Section 7 of the ESA before signing a decision on this project. |


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| National Forest Management <br> Act - Wildlife | The Plumas' proposed OSV designations have the potential for substantial impacts on wildlife species, thereby threatening their viability. To comply with NFMA's viability and diversity protection requirements, 16 U.S.C. § 1604(g)(3)(B), the Forest Service must avoid any possibility of leading to a trend toward federal listing of species on the Plumas. <br> Reference the attached comments for specific species of concern. | The spatial boundaries for analyzing the direct, indirect, and cumulative effects to all of the species under consideration for analysis, including threatened, endangered, proposed, candidate, Forest Service sensitive species, and species of public interest is the Plumas National Forest boundary (unless otherwise specified) for the following reasons: the forest boundary is large enough to address wide-ranging species and Forest Service Sensitive Species' viability is assessed at the Forest Plan area. The determination under all alternatives is the same... may affect individuals, but not likely to lead to a loss of viability or a trend toward Federal listing... expanding or shrinking the analysis boundary would not provide meaningful information. The rationale provided for the determination in the FEIS supports the choice in spatial boundary used. |


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| Endangered Species Act Wildlife | The Forest Service must ensure that its actions comply with the Endangered Species Act (ESA). The Plumas National Forest home to gray wolves. Section 7 of the ESA imposes a substantive obligation on federal agencies to "insure that any action authorized, funded, or carried out by such agency . . . is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of" habitat that has been designated as critical for the species. 16 U.S.C. § 1536(a)(2); Nat'I Wildlife Fed'n v. Nat'I Marine Fisheries Serv., 524 F.3d 917, 924 (9th Cir. 2008). Because the OSV designations may affect these listed species' and critical habitat, the Forest Service must complete Section 7 consultation under the ESA. Importantly, we encourage the Forest Service to be transparent about any consultation processes and affirmatively post all consultation documents, including any Forest Service Biological Evaluations or Assessments, any letters seeking concurrence, and any responses or Biological Opinions from FWS on the project webpage. Without these records, we are unable to assess the agency's analysis of impacts to wildlife in light of FWS's expert opinion. | Thank you for your comment. The Forest Service does comply with the Endangered Species Act concerning all listed species. Please refer to Chapter 3 of the FEIS for effects analyses and findings of consistency. |


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| Wilderness - Restrictions Unwarranted | There is no lawful basis to categorically restrict OSV travel, or other motorized/mechanized transport, from Inventoried Roadless and Recommended Wilderness areas. Restrictions in these areas represent 'Wilderness Creep', the increasingly common push to manage noncongressionally designated Wilderness areas as designated Wilderness. | Thank you for your comment. <br> The Wilderness Act of 1964 as amended requires that "All National Forest lands within Congressionally designated Wilderness and areas recommended for Wilderness will be managed in accordance with the Wilderness Act of 1964 as amended." As such, Recommended/Proposed Wilderness areas on the Plumas National Forest are closed to motorized use and managed to a Recreation Opportunity Spectrum of non-motorized, semi-Primitive. It is unlawful to allow motorized OSV-use in Recommended (Proposed) Wilderness areas on the Plumas National Forest. <br> The 2001 Roadless Area Final Rule defines the following features that often characterize inventoried roadless areas: High quality or undisturbed soil, water, and air; Sources of public drinking water; Diversity of Plant and animal communities; Habitat for threatened, endangered, proposed, candidate, and sensitive species for those species dependent on large, undisturbed areas of land; Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation; Reference landscapes; Natural appearing landscapes with high scenic quality; Traditional cultural properties and sacred sites; and Other locally identified unique characteristics. The purpose of the 2001 Roadless Area Final Rule was to provide, within the context of multipleuse management, lasting protection for IRAs with the NFS. The 2001 Roadless Area Final Rule includes two categories of prohibitions: (1) Prohibition on road construction and road reconstruction in inventoried roadless areas (36 CFR 294.12); and (2) Prohibitions on timber cutting, sale, or removal in IRAs (36 CFR 294.13). <br> The commenter is correct, that as written, the 2001 Roadless Area Final rule does not categorically restrict OSV travel or other motorized/mechanized transport in these areas. However, the Forest Service does have a responsibility to analyze and disclose any potential impacts that our proposed OSV-designations may have on the resources or features that are often present in and characterize IRAs. Refer to the FEIS, volume I pages 112, 120, 126, 133, and 143 for analyses and findings specific to Inventoried Roadless Areas. <br> The Travel Management Regulations set forth designation criteria that are to guide the responsible official's designation of areas and trails for OSV use (see 36 CFR §212.55(a-e1) and are found in the FEIS, appendices D and E. These criteria delineate certain elements and resources, the effects on which the responsible official must consider |


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| Wilderness - Restrictions Unwarranted (continued) |  | The Travel Management Regulations describe the general designation criteria (36 CFR 212.55(a)) as follows: <br> In designating National Forest System roads, National Forest System areas and trails on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System 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. <br> The Travel Management Regulations describe the specific designation criteria (36 CFR 212.55(b)) as follows: <br> In addition to the criteria in paragraph (a) of this section, in designating National Forest System areas and trails on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: <br> 1) Damage to soil, watershed, vegetation, and other forest resources; <br> 2) Harassment of wildlife and significant disruption of wildlife habitats; <br> 3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and <br> 4) Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. <br> In addition, the responsible official shall consider: <br> 5) Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors. <br> Additionally, 36 CFR 212.55(d) requires the responsible official to recognize: <br> 1) Valid existing rights; and <br> 2) The rights of use of National Forest trails of access in designating trails and areas for OSV use. <br> And 36 CFR 212.55(e) provides that: <br> National Forest System trails, and areas on National Forest System lands in wilderness areas or primitive areas shall not be designated for motor vehicle use ...unless, in the case of wilderness areas, motor vehicles use is authorized by the applicable enabling legislation for those areas. |


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| Wilderness - Restrictions Unwarranted (continued) |  | To apply the minimization criteria (36 CFR 212.55(b)(1-4)) and the other specific criteria for designating trails and areas for OSV use ("Specific Designation Criteria")(36 CFR 212.55(b)(5); (d); and e)), the Forest Service conducted a minimization criteria screening exercise that included four steps. Chapter 2 of the FEIS provides a more detailed description of the minimization criteria screening exercise. <br> The screening exercise was applied to the existing network of OSV trails, including groomed and ungroomed, additional trails proposed during public comment periods, and for NFS lands that received adequate snow. Results of this exercise helped identify potential impacts and conflicts that may occur as a result of designating OSV trails and areas. The exercise resulted with the OSV trails and areas proposed in one or more action alternatives or eliminated from proposed designation. <br> The 1988 Plumas National Forest Land and Resource Management Plan was developed under the 1982 Planning Rule. Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, level of resource production and management, and the availability and suitability of lands for resource management (1982 Planning Rule, section 219.1(b)). The forest plan shall contain four parts, one of which is "(c) Multipleuse prescriptions and associated standards and guidelines for each management area including proposed and probable management practices...." (1982 Planning Rule, section 219.11). <br> The Plumas National Forest Land and Resource Management Plan identifies Forest goals and policies for recreation as follows (page 4-3): <br> (1a) Provide for a variety of forest-related recreation, and coordinate recreation with other resource use through the Recreation Opportunity Spectrum system. Encourage growth of privately-operated facilities serving public needs. Improve and expand developed facilities and trails to meet demand while reducing unit costs and protecting other resources. <br> Complete acquisition of Wild and Scenic River lands and easements. Minimize conflicts between various recreational users. Manage selected unroaded areas to provide for semi-primitive opportunities. <br> (1b) Allow use of off-road vehicles wherever user conflicts or unacceptable resource damage are unlikely. <br> Provide separate ORV routes wherever conflicting uses are substantial. |


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| Wilderness - Restrictions Unwarranted (continued) |  | Because the Plumas National Forest Land and Resource Management Plan (PNF LRMP) was completed in 1988, the minimization criteria of the 2005 and updated 2015 Travel Management Rule were considered as an overlay to the goals, policies, standards, and guidelines of the PNF LRMP. Forest Plan amendments are required for actions that exceed the standard and guideline thresholds, not for activities that are within that threshold. For example, if oversnow vehicles (or ORVs) were not allowed in a specific area as identified in the 1988 PNF LRMP and this project proposed to designate an area or trail for OSV that is currently prohibited, a Forest Plan amendment would be required. However, when snowmobiles are allowed by the PNF LRMP, and this project proposes to not designate snowmobile use, there is no requirement for a forest plan amendment because the use is within the threshold. <br> Rx-8 Semi-Primitive Area Prescription is described in the PNF LRMP on page 4-88-4-90. The description of $R x-8$ states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow nonmotorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area. The prescription applies to the following roadless areas: Bald Rock, Beartrap, Chips Creek, Dixon Creek, Grizzly Ridge, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak" (PNF LRMP, page 4-88). General direction includes "provide a non-motorized experience (1a)" and standards and guidelines state "allow no motorized travel except over-the-snow and management access" (PNF LRMP, p.4-88). <br> Semi-Primitive Area Prescription (Rx-8) of the 1988 Plumas National Forest Land and Resource Management Plan (LRMP) was not recommended for designation in open areas to minimize effects to the semi-primitive nature of $\mathrm{Rx}-8$. The Semi-Primitive Prescription description in the LRMP emphasizes non-motorized recreation and states "this prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area" and applies to a total of 79,500 acres of NFS land (page 4-88). <br> The 1988 LRMP considered specific standards and guidelines for the Lakes Basin Management Area and states "Allow motorized over-the-snow travel, but consider restricting to designated areas if conflicts develop with other users or resources" (page 4-324). The NFS lands proposed for designated open areas for OSV use is a result of minimization criteria evaluation and consideration of public comments specific to the Lakes Basin area and site specific comments around uses, conflicts, and resource concerns. |


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| Wilderness - Restrictions Unwarranted (continued) |  | Based on comments received during public comment periods, the open area in Lakes Basin was modified. The modified open area proposed for designation is from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and follows a ridge toward Graeagle Lodge. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. The Plumas National Forest Environmental Impact Statement (EIS) for the Land and Resource Management Plan discussed semi-primitive areas in the context of the existing condition and affected environment for each alternative considered. Focusing on the existing condition for recreation resources the EIS for the LRMP states "Due to the extensive PNF road system, no "primitive" areas and only 12 "semi-primitive" areas over 2,000 acres each remain on the Forest. One, the Bucks Lake Wilderness, is discussed in the later section Wilderness. The others are described in appendix L [of the EIS]. In addition to the Bucks Lake Wilderness and the Wild and Scenic River, about 115,000 acres (or $9.9 \%$ of the Forest) are free from motorized use, and 7,000 acres ( $0.6 \%$ of the Forest) contain only 4WD [ 4 wheel drive] trails. All of the areas except Dixon Creek have high scenic value due to their distinctive landscape" [EIS for the LRMP, (11), page 3-27]. <br> It is also worth noting that in 1988 the EIS for the LRMP stated that "Crosscountry skiing is the fastest growing dispersed recreation activity on the Forest" (EIS for the LRMP, (f), page 3-31). The EIS for the LRMP further explained "Existing demand conflicts would require resolution, including: (3) <br> Snowmobiling vs. cross-country skiing, within 1-2 miles of points of departure" (EIS for the LRMP, p.32). <br> Focusing on the affected environment for recreation resources and consequences common to all alternatives, the EIS of the LMRP states "Although areas closed to wheeled vehicles would vary considerably by alternative, topography in fact makes most of the Forest inaccessible. Since the vast majority of the accessible Forest would be open in all alternatives, the needs of the many small ORV groups and individual ORV recreationists should be met even in the absence of semi-primitive ROS class allocations. Certain new closures would occur, frustrating some individuals." Under the preferred alternative that was selected in the Record of Decision, "About 79,500 acres ( $6.8 \%$ of Forest total acreage) would be retained as semi-primitive areas. Nevertheless, the Forest's present capacity to meet semi-primitive demand would be largely utilized by 2000" (EIS of the LRMP, page 4-10). |


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| Wilderness - Restrictions Unwarranted (continued) |  | Appendix $L$ of the EIS for the LRMP includes areas considered for semiprimitive management (EIS for the LMRP, pages L-1 -L-41). This appendix described the semi-primitive areas on the PNF as defined by the Recreation Opportunity Spectrum (larger than 2,500 acres). Semi-primitive areas considered in the preferred alternative include: Adams Peak, Bald Rock, Beartrap, Bucks Creek, Chips Creek, Dixon Creek, Grizzly Peak, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak. <br> The 1988 PNF LRMP was appealed by several entities-in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. <br> Prohibiting OSV use within Rx-8 is within the responsible official's discretion and does not require a forest plan amendment. A forest plan amendment is not required because prohibition of OSV use does not impact $R x-8$ areas beyond the limits of the LRMP analysis. Prohibiting OSV use in $\mathrm{Rx}-8$ is within the analysis framework considered in the LRMP, does not exceed the uses proposed in the LRMP, and is within the Responsible Official's discretion. Further, this prohibition is supported by "activities are permitted only if they are unobtrusive and maintain the character of the area", which was considered during minimization criteria evaluation. A forest plan amendment is not required by prohibiting OSV use in Rx-8 areas. This logic and conclusion applies to all areas of the Forest where the 1988 PNF LRMP currently allows OSV use and this project recommends prohibition of OSV use. <br> In the context of this project and OSV use designations, a forest plan amendment is required when OSV use is proposed in areas where the LRMP prohibits or restricts OSV use. For example, under the Bald Eagle Habitat Prescription (Rx-11) the LRMP states "close the areas to ORVs" (OSV are included in the definition of ORV, see LRMP EIS, Glossary, Definitions, page 29). Allowing OSV use in Rx-11 exceeds the limits of the analysis in the LRMP. Allowing OSV use in $\mathrm{Rx}-11$ is not within the analysis framework considered in the LRMP, exceeds the uses proposed in the LRMP, is not within the Responsible Official's discretion, and would require a forest plan amendment using the 2012 Planning Rule regulations. |


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| Wilderness - Restrictions Unwarranted (continued) |  | Bald eagles are protected under the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act. Plumas LRMP (1988) Bald Eagle Habitat Prescription ( $\mathrm{Rx}-11$ ) includes the following: Limit recreation use in bald eagle habitat, 4-96); Close the areas to ORV use (4-96); Preclude development of recreation facilities within the nesting territories (4-96). Between November 1 and March 31, limit activities within winter roost habitat to minimize disturbance (4-97). Consistent with Forest Plan ( $R x-11$ ), bald eagle nesting territories would not be designated for cross-country OSV use. Pass-through only travel on designated OSV trails would be allowed in these areas. Limiting OSV travel to the trail only within (and adjacent to) eagle territories would likely mitigate potential adverse effects to eagles (FEIS, Appendix D). <br> Prohibiting OSV use within congressionally designated roadless and inventoried roadless areas resulted from minimization criteria evaluation. Although the 2001 Roadless Rule established prohibitions on road constructions, road reconstruction, and timber harvesting in inventoried roadless areas on NFS lands, the intent of the final rule is to provide lasting protection for inventoried roadless areas within the NFS in the context of multiple use management (Special Areas; Roadless Area Conservation, Federal Register, volume 66, number 9, page 3244). Roadless areas often provide outstanding dispersed recreation opportunities, mechanized means of travel is often allowed. These areas can often take pressure off heavily used wilderness areas by providing solitude and quiet, dispersed recreation opportunities (lbid, page 3245). Further, most of the Inventoried Roadless Areas resulting from the 2001 Roadless Rule were considered under the then current direction during the development of the 1988 Plumas National Forest Land and Resource Management Plan. Generally IRAs overlay with semiprimitive areas. Prohibiting OSV use within IRAs and Semi-Primitive Prescription (Rx-8) was to "maintain the character of the area". <br> The Record of Decision for the LRMP states "about 9 percent of the PNF will be managed for semi-primitive and primitive recreation as provided by roadless areas, wild and scenic rivers, and Wilderness. As cross country skiing and snowmobiling increase, a high priority will be placed on managing and coordinating these sometimes conflicting uses" (page 3). "The Semi-Primitive Prescription (Rx-8) permits limited management activities...to take place in these areas provided that the semi-primitive nature of the area is protected. Opportunities are available for activities such as hiking and walking, horseback riding, viewing scenery, camping, hunting, nature study, mountain climbing, swimming, fishing, cross-country skiing and snowshoeing" (page 5). |


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| Wilderness - Restrictions Unwarranted (continued) |  | When considering public comments around "Semi-Primitive Roadless" designation for the LRMP and drafting the ROD, "the title of the prescription for management of these areas has been changed from Semi-Primitive NonMotorized to Semi-Primitive. Language has also been inserted into the SemiPrimitive Prescription ( $\mathrm{Rx}-8$ ) that would permit limited management activities to take place in these areas providing the semi-primitive nature of the areas is protected" (page 11). <br> The ROD for the LRMP clarifies "the only Semi-Primitive Motorized Area (SPM) on the Forest in the FEIS is Adams Peak (7,000 acres). Accordingly the SPM designation has been dropped in the Plan, even though motorized use will still be allowed to occur" (page 11). This helps explain why the title of designation in the LRMP reads as "Semi-Primitive" Prescription, emphasized nonmotorized uses, and does not include a "non-motorized" or "motorized" descriptor in the title. <br> The 1988 Plumas National Forest LRMP was appealed by several entities; in 1991 the Plumas National Forest received an appeal submitted by the American Rivers, Inc. and contended that the Forest planning documents failed to properly determine the eligibility of the streams and river on the Plumas National Forest for inclusion in the Wild and Scenic River system. The Forest Service committed to complete a comprehensive assessment of Wild and Scenic Rivers on the Plumas National Forest by the end of the 1993 fiscal year. An agreement between appellants and the Plumas National Forest resulted in the Plumas National Forest considering all rivers and river segments on the Plumas National Forest, and identified several river segments as "eligible" for Wild and Scenic River designation. An agreement between the appellants and the Plumas National Forest included a commitment for "planned Forest Service management activities within $1 / 4$ mile of each bank of the river or stream will be consistent with the direction for Wild and Scenic rivers until eligibility and river classification is determined". Eligible rivers and river segments that included wild zones were not proposed for OSV designations because "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" (Public Law 90-542Oct. 2, 1968, page 907). A quarter mile buffer was placed around eligible wild and scenic river segments, specifically those with wild zones, and not included for OSV use designations during minimization criteria evaluation to maintain the "shorelines essentially primitive and waters unpolluted." |


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| Wilderness - Restrictions Unwarranted (continued) |  | The 1988 LRMP contains opportunities for management change for the recreation resources. One of these identified opportunities is to "develop parking and sanitation facilities for cross-country skiers and snowmobilers and resolve conflicts between them" (page 3-6). In areas of high motorized and non-motorized use such as Bucks Lake and Lakes Basin, and for the purposes of OSV use designations, areas that receive adequate snow, an opportunity for management change was identified. Coupled with public comments that include displacement of non-motorized users because of motorized uses it is the Responsible Official's requirement to consider the effects with the objective of minimizing "conflicts between motor vehicle use and existing or proposed recreational uses of NFS lands..." (36 CFR 212.55(b)). |
| Range of Alternatives Wilderness - New Alternative | The Forest Service must thoroughly analyze and minimize impacts of its OSV designation decisions to wilderness-eligible lands. This will require full consideration of the best available scientific information associated with TWS's wilderness inventory and evaluation and analysis of a robust range of alternatives. The current range of alternatives does not facilitate adequate analysis or minimization of impacts to wilderness-eligible lands. The analysis in the DEIS should include at least one alternative that would not designate any areas or trails in the TWS inventory as open to OSV use and modify Alternative 2 to not designate any existing IRAs as open to OSV use. | Scoping for the Plumas National Forest Over-snow Vehicle Use Designation Project began in November, 2015. The public was able to submit comments on the Proposed Action at any point from that point on; however, the Interdisciplinary team did not receive the TWS inventory from the Wilderness Society until July 13, 2018, when the TWS inventory was sent to the Plumas Forest Supervisor at the time, Daniel Lovato. The Wilderness Society requested in their letter that the inventory they provided be incorporated into the analysis and an alternative developed that would not designate any of the TWS inventory. The effects analysis for the DEIS was already underway at that point, and due to court-mandated timelines for the FEIS, it was not feasible to incorporate the TWS inventory into the analysis, nor develop an additional alternative. <br> Although not all of the TWS wilderness-eligible inventory submitted to the Forest Service is incorporated into any of the alternatives, a large portion of the TWS inventory is incorporated into various alternatives for lands not designated for OSV use. Under alternative 2-modified of the FEIS, a total of 324,199 acres outside of wilderness and private land is not proposed for designation for OSV use, which includes 40 percent of TWS's wilderness-eligible inventory (136,729 of 344,343 acres). Under alternative 3 of the FEIS, a total of 583,050 acres outside of wilderness and private land is not proposed for designation for OSV use, which includes 48 percent of TWS's wilderness-eligible inventory (177,376 of 344,343 acres). Under alternative 5 of the FEIS, a total of 531,860 acres outside of wilderness and private land is not proposed for designation for OSV use, which includes 52 percent of TWS's wilderness-eligible inventory (164,298 of 344,343 acres). |


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| Range of Alternatives Wilderness - New Alternative (continued) |  | The 2001 Roadless rule prohibits road construction and road re-construction in Inventoried Roadless Areas (IRAs) (36 CFR 294.12) and prohibits timber cutting, sale, or removal in Inventoried Roadless Areas (36 CFR 294.13). However, there are no prohibitions against allowing motorized use within IRAs in the Roadless Rule. The FEIS discloses impacts to the roadless characteristics of 1) undisturbed soil, water, and air (short-term impacts to air quality due to the presence of OSV exhaust), and (2) solitude (due to the sights and sounds of OSVs) (FEIS, Chapter 2, Alternatives summary table and throughout the Recreation Section). Although not specifically aggregated under the Inventoried Roadless Area heading, the FEIS addresses potential impacts to air quality, hydrology, soils, terrestrial wildlife, aquatics, botany and cultural resources for each of OSV areas proposed for designation, including those portions of IRAs that are proposed for OSV designation. Appendices D and E of volume II of the FEIS disclose area and trail analysis for minimization criteria (b)(3) Minimize conflict between motor vehicle use and existing or proposed recreational uses of NFS lands or neighboring Federal lands, documentation for potentially affected IRA is included. Due to the temporal nature of OSV use and the lack of on-the-ground imprints after snow melt, designating where OSVs could operate on the Plumas NF would not preclude any area from being considered for wilderness in the future. The Wilderness Inventory process under the 2012 Planning Rule (FSH 1909.12-70 Wilderness) includes the following inventory criteria: Include an area in the inventory when: 1. The area meets the size criteria defined in section 71.21 and has no improvements; or 2. The area meets the size criteria defined in section 71.21 and is consistent with the improvements criteria defined in sections 71.22a and 71.22b. Motorized OSV use over-snow, when snow depth is adequate for that use to occur would not be considered an improvement and would not degrade or disqualify the area for consideration in subsequent wilderness inventory processes. |


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| $\begin{array}{ll}\text { Range of Alternatives - } \\ \text { Wilderness - New Alternative } \\ \text { (continued) }\end{array}$ |  | $\begin{array}{l}\text { The Semi-Primitive Area Prescription (Rx-8) in the Plumas LRMP and IRAs } \\ \text { (RARE II) generally overlap. Under Alternative 5 OSV use was excluded from } \\ \text { all Semi-Primitive Prescription areas (Rx-8) and IRAs; however, a few small }\end{array}$ |
|  |  | $\begin{array}{l}\text { areas were placed back in for connectivity for historic OSV use. Alternative 2 of } \\ \text { the FEIS has been modified to prohibit OSV use in the entire Adams Peak IRA } \\ \text { to protect non-motorized characteristics. Only a small portion of this area was }\end{array}$ |
|  |  | $\begin{array}{l}\text { open to OSV use in Alternatives 2 and 5 in the DEIS, and these small areas } \\ \text { would now be closed in Alternative 2 of the FEIS. Under Alternatives 2 and 3, }\end{array}$ |
|  |  | OSV use was not designated in the majority of these Rx-8 prescriptions or |
| IRAs (Bald Rock, Dixon Creek, Grizzly Ridge, Middle Fork, Thompson Peak) |  |  |$\}$


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| EIS Maps Legibility | The commenter requests that the DEIS and EIS incorporate specific "inset maps" that depict the proposed restriction areas at a higher scale in order to increase the resolution at the proposed restriction areas instead of relying on just one map at a scale that covers the entire National Forest area. | Thank you for your comment. <br> Alternative specific maps were inserted into the FEIS and separate printable files (.pdf) were made available on the project specific website. An email from Plumas County was received on Sunday, December 2, 2018 by the team leader for this project. The team leader contacted Plumas County three times by phone with no contact. <br> Updated alternative specific maps (1-6) using the Forest Visitor map were created and uploaded (11/2/2018) to the Plumas National Forest OSV webpage: <br> https://www.fs.usda.gov/detail/plumas/landmanagement/?cid=stelprdb5211065. <br> The Forest Visitor map provides townships, ranges, and sections; topography; roads and trails; and other helpful information for orientation on the Plumas National Forest. <br> The updated map file sizes were too large to publish to the project specific webpage via PALS (Planning Appeals and Litigation System). A Word document was uploaded to the project specific webpage (11/05/2018) providing the above hyperlink for the public to access the new updated maps. The project specific webpage is: https://www.fs.usda.gov/project/?project=47124. The FEIS, original alternative maps, and legal notice are stored and accessible at the project specific webpage under the "Analysis" tab. <br> The Plumas National Forest provided alternative and location specific inset maps to Plumas County at the May 2, 2019 Plumas County Coordination Council meeting. These maps were displayed at the February 2019 public meetings held during the 111-day comment period. |
| Air Quality - Analysis | Comments specific to the OSV Use Designation Air Quality analysis. | Thank you for your comment. |
| Air Quality - General (Motorized viewpoint) | General air quality comments from the motorized viewpoint Comment 37-2 Commenter is concerned about breathing fumes as snowmobiles pass. Comment 136-4 The commenter stated their opinion regarding pollution from snowmobiles in the national forest as compared to the pollution from the cars in the squaw valley or Northstar parking lot. | Thank you for your comment. |
| Air Quality - General (Nonmotorized viewpoint) | Commenter provided information on the air born toxins two-stroke engines emit and the health effects in humans and animals citing EPA 1993, Eriksson et al. 2003, Reimann et al. 2009. | Thank you for your comment. |


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| Climate Change - Inadequate Analysis | It is well documented that climate change is leading to a reduced snow season in the Sierra Nevada. Not only is the season getting shorter, the physical footprint of where snow occurs is shrinking. 18 This means that in the future winter recreationists will have less space in which to recreate. Even in the high Sierra, where climate impacts are projected to be less severe than other locations, scientists predict that the snow season will decrease by at least 20 percent by 2050.19 This change is already happening. As we've already discussed in these comments, recent research in the Tahoe region reveals that snow accumulation is now occurring significantly later than it did just 10 years ago, and the average winter snowline has moved significantly uphill. 20 Climate change and accompanying changes in snow accumulation and snowpack on the PNF will have significant repercussions for winter recreationists. As the total acreage covered by deep snow decreases there will be less space for recreationists to spread out to avoid conflict. Likewise, as traditional winter trailheads lose snow cover for all or part of the traditional winter season, use patterns will change. The PNF winter travel plan should be forward-looking and proactively address the conflict and access issues predicted to occur as snowpack continues to retreat.[...]19 Id.[...]20 Hatchett et al. 2017. Winter Snow Level Rise in the Northern Sierra Nevada from 2008 to 2017. Water: 9(11), 899; <br> https://doi.org/10.3390/w9110899. | Snowmobiles and their impact on carbon emissions are addressed in the FEIS in Chapter 3, Affected Environment and Environmental Consequences. A study in Vermont concluded declining snowfall in Vermont at the normal elevations of most snowmobile trails has already occurred and is likely to continue in coming years. Days of snow cover were a significant detractor and with fewer days of snow cover participation rates would begin to decline. (Wakefield 2016). Based on this research, Snowmobile usage on the Plumas could also decline or usage shift to higher elevation routes due to availability of snow. The quantity of greenhouse gas emitted is not expected to increase. With estimated annual visitor use of 22,250 on the Plumas, it is likely emissions contributions to the atmosphere would decline as visitor use declines due to lack of snow (FEIS, Chapter 3, Affected Environment and Environmental Consequences, Greenhouse Gases and Climate Change). <br> Climate change's potential impacts on recreation are addressed in the FEIS in Chapter 3, Affected Environment and Environmental Consequences, Recreation section. A general assumption can be made that as an area's population increases over time, visitor use will also increase, along with the potential for use conflicts on the limited public recreation resources. However, OSV use is also dependent on weather conditions and snowpack. OSV use has not increased at the rate that was anticipated in the 2009 State Draft EIR (OHMVR Division 2010). Due to the fluctuations in OSV use levels and winter conditions, it is difficult to accurately predict whether use conflicts will continue to increase over time. As the climate changes and snow levels are limited to higher elevations, the area on the Plumas National Forest with sufficient snow for OSV use would be reduced. This would potentially lead to a loss of motorized recreation opportunities, or increased use conflicts as both motorized and non-motorized winter visitors are spread across an area with less snow and shorter winter seasons (FEIS, Chapter 3, Environmental Consequences, Recreation section). Since it is difficult to predict exactly how climate change will impact the quality of recreation experiences and future conflicts between motorized and non-motorized, the Forest must rely upon future management actions to address changing conditions due to climate change. |


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| Climate Change - Adequate Snowfall | In order to plan for the future, we recommend that the Plumas National Forest restrict OSV use below 5,000 feet in elevation; provide wildlife habitat corridors for Threatened, Endangered, and Sensitive Species; and develop a Winter Recreation Management Plan that anticipates conflicts between wildlife and winter uses by describing Desired Future Conditions and establishing realistic Goals, Objectives, and Actions to meet those conditions. | A 5,000-foot elevation restriction was analyzed under Alternatives 3 and 5 . Alternative 2 of the FEIS considers designating areas above 3,500 feet. The process used by the Interdisciplinary team to identify an elevational restriction for OSV use in various alternatives is described in the FEIS in Chapter 2, under Alternative Development. The 3,500-foot elevation was used as a screening tool to narrow our efforts to NFS lands most likely to receive snowfall in adequate amounts to support OSV use. We took into account observed conditions at various elevations across the Forest (frequency of snowfall, longevity, and quality of snow conditions) where snowfall is adequate for OSV use to occur (36 CFR 212.81(a)). A complete description of how the elevation range was considered during development of alternatives can be found in the FEIS in Chapter 2, under Alternative Development. <br> Subpart C of the Travel Management Regulations requires that, designated public OSV areas and trails shall be identified on a publicly available OSV-use map (OSVUM) [(36 CFR 212.81 (c)]. Once issued, designations would be made enforceable under 36 CFR 261.14, which prohibits the possession or operation of an OSV on NFS lands other than in accordance with the Subpart designations, subject to the exceptions listed at 36 CFR 261.14(a-f). (FEIS Chapter 1, Travel Management Regulations). Areas that are designated for OSV use in the preferred alternative (alternative 2) would not be open to OSV use unless there is adequate snow, which would help ensure protection of underlying resources and protection of Threatened, Sensitive, and Endangered species. Potential impacts on wildlife, including Threated, Endangered, and Sensitive species are addressed in the FEIS in Chapter 3, Affected Environment and Environmental Consequences, Environmental Consequences, under the Wildlife Section. |
| Noise/Solitude (Nonmotorized viewpoint) | General comments regarding the importance of solitude and quiet recreation from the nonmotorized viewpoint. | Quiet non-motorized opportunities were considered in the analysis and compared across alternatives - see issue 1b. Availability of Nonmotorized Winter Recreation Opportunities. |
| Noise/Solitude (Motorized viewpoint) | Comments regarding the importance of solitude and quiet recreation from the nonmotorized viewpoint. | Six alternatives were analyzed that considered a range of motorized and nonmotorized opportunities. Issue 1b. Availability of Nonmotorized Winter Recreation Opportunities is compared across each alternative. The imposition of best available technology requirements is outside the scope of the purpose and need for action, which is to provide a manageable, designated OSV system of areas and trails for public use within the Plumas National Forest that is consistent with and achieves the purposes of the Forest Service Travel Management Rule at 36 CFR Part 212, subpart C. The regulation of best available technology, whether only encouraged or mandated, is outside the scope of this analysis. The Forest Service has no regulatory jurisdiction over air quality or noise, and there are no Forest Service directives requiring the establishment of standards. Therefore, this feature will not be included in alternative 3 of the FEIS to be analyzed in detail. |


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| OSV Trails - Specific Routes (Botany) | Comments that request OSV Trail Designation on specific routes. These routes have botany concerns identified in the DEIS. | Mount Fillmore, Dixie Mountain, McRae Meadow, and Brady's Camp areas are Special Interest Areas that were not designated for OSV use in some alternatives, for multiple reasons including wildlife habitat connectivity, local plant species of concern, and the need to provide for areas of non-motorized recreational interests. These areas were not excluded from designated OSV use solely for the protection of low growing plant species. <br> It is not true that absolutely no effects are possible to plants from OSV use over a minimal one to two feet of snow. Although minimal to no effects are expected for most rare plant species/occurrences, some direct and indirect effects are possible depending on life form and habitat types, as described in the supporting botany analysis for this project. |
| Soils/Hydrology - DEIS | Comments about soils / hydrology that need to be addressed in the DEIS. | Within the analysis, we analyze potential effects based on OSV use occurring with a minimum snow depth on trails and cross country. Direct contact of an OSV with the soil surface is unlikely, but effects to the soil resource if that were to occur are discussed in the soils section of the FEIS (FEIS volume I pages 359-369). Minimum snow depths under alternatives 3 and 5 (Table 8 in the FEIS volume I) address potential concerns proposing an 18 inch (alternative 3) or 24 inch (alternative 5) minimum snow depth prior to cross-country OSV travel. Snow depth monitoring is proposed throughout the project area, but especially focused in areas where there is concern of sensitivity including areas with sensitive soils (FEIS volume I page 35) to ensure compliance. OSV use is prohibited unless it occurs in a designated area and enforcement of the minimum snow depth requirements will occur (FEIS volume I page 35). Snow depth concerns also exist for hydrology. Too little snowpack can result in impacts to soils or trail surfaces that can lead to stream sedimentation. These effects are covered in the hydrology section of the FEIS Pages 370-397). |


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| Hydrology - Water Quality / <br> Sedimentation | Comments about water <br> quality/sedimentation. | Page 382 of volume I of the FEIS states "For snowmobile uses on open water, <br> All action alternatives provide restrictions on operation of OSVs over open or <br> flowing water. This would prevent direct contact with water and the potential for <br> ground disturbance near streams, channel disturbance, or lake bank <br> disturbance." <br> Snowmobile use, with adequate snow depths, cross-country use of OSVs <br> would have a negligible effect on ground disturbance that could lead to erosion <br> and sedimentation in streams or other water bodies, and a negligible effect on <br> vegetation, especially along streams and other water bodies. Adequate snow <br> depths are snow depths that provide sufficient depth to prevent resource <br> damage including damage to underlying vegetation, soil or ground disturbance. <br> Ground disturbance would be negligible because off-trail OSV use would <br> generally be dispersed and would not result in high concentrations of OSV use <br> on bare soil. Also, travel over bare soil can damage machines, so is generally <br> avoided by operators. With adequate minimum snow levels, this management <br> strategy would result in no more than incidental and localized soil erosion, and <br> therefore, would not create water quality impacts to streams or water bodies by <br> introducing sediment in water runoff. <br> The effects from organic chemicals contained in snowmobile exhaust are <br> addressed in the FEIS volume I on pages 373-374. Effects from the project will <br> be within water quality standards. |
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|  |  | Although minimal to no effects are expected for most rare plant <br> species/occurrences, some direct and indirect effects are possible depending <br> on life form and habitat types, as described in the supporting botany analysis <br> for this project, also addressing effects from snow compaction and pollutants. <br> Comments about the need for forest thinning are outside the scope of this |
| project. |  |  |


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| Aquatics - Emission Concerns | Comments concerned with emissions and effects to aquatics. | Snowmobiles are sources of volatile and semi-volatile organic chemicals that are released in to the air and absorbed in to the snow pack. Analysis of these compounds is on pages 373-374 of volume I the FEIS. <br> The analysis in the FEIS utilized the available literature. Studies on snowmobiling impacts from Yellowstone NP at much higher use levels than are anticipated on the Plumas found the very low concentrations were found to be below EPA criteria and guidelines for the VOCs analyzed. Levels were below levels that would adversely impact aquatic ecosystems (Arnold and Koel 2006). Information on PAH were also considered in the analysis. These values were below water quality standards. |
| Visuals - General | General comments related to visuals. | Scenery resources are analyzed in the FEIS Issue 1c. Quality of Motorized and Nonmotorized Over-snow Recreation Experiences e) Impacting the scenery by reducing the amount of unaltered views. Potential impacts to scenery associated with OSV use would be short-term and temporary. A comparison by alternative is in Table 9. Summary comparison of how the alternatives address the key issues (FEIS page 53). |
| DEIS - Wildlife (OSV Use of "harassment") | Comments regarding use of the term 'harassment' in the DEIS, as related to wildlife. | Thank you for your comment. Agreed that there are many definitions of harassment and while the OSV community never intends to harass wildlife, any recreationists that encounter wildlife can cause a flee/avoidance response which can cause an immediate physiological response that increases metabolic rates and stress responses. |
| Wildlife - Non-motorized vs. motorized effects | Comments that describe non-motorized vs. motorized effects to wildlife from the nonmotorized viewpoint | Thank you for your comment. |
| CA Yellow/Red Legged FrogDEIS Failures | Comments that indicate the DEIS fails to consider the differences in minimum snow depths among alternatives and how that might have different impacts on the frogs and their suitable habitat. | Comment number A72-49, A86-44, A86-70,A 86-71, C20-22: The potential direct and indirect effects of designated over-snow vehicle cross-country and trail use on the California red-legged frog and Sierra Nevada yellow-legged frog were adequately analyzed for each of the alternatives. The potential direct effects of designated over-snow vehicle cross-country and trail use related to collisions and noise disturbance were considered for both species and analyzed using the existing scientific literature and count data contained in U.S. Forest Service and California Department of Fish and Wildlife databases. The locations where California red-legged frogs and Sierra Nevada yellowlegged frogs have been detected in the Plumas National Forest were presented in the Final Environmental Impact Statement within Figure 5 (page 228) and Figure 6 (page 233), respectively. The risk of adult Sierra Nevada yellowlegged frogs and California red-legged frogs being directly affected by designated over-snow vehicle use while they disperse over snow during the spring thaw period was assessed and it was concluded that direct |


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| CA Yellow/Red Legged FrogDEIS Failures (continued) |  | harassment, harm, injury or death of adults may occur for each of the alternatives from designated over-snow vehicle use. However, the likelihood of this occurring during the spring period was relatively low based on these dispersal areas having, at least in some locations, less snow depth than what would be required by alternatives 2 through 5 . In these situations, designated over-snow vehicle use would be prohibited. In addition, the amount of suitable and critical habitat that would be potentially affected by designated over-snow vehicle use was quantified for the California red-legged frog and Sierra Nevada yellow-legged frog. The amount of habitat that would be potentially affected by designated over-snow vehicle use varied among the alternatives based on, in part, attempts to minimize the impacts to the California red-legged frog and Sierra Nevada yellow-legged frog. <br> Further, monitoring would be conducted for all the action alternatives and increases in minimum snow depths among the alternatives were intended to minimize the impacts to these species' habitats. It was assumed and scientific evidence suggests that the likelihood of aquatic habitat disturbance would be minimized if designated over-snow vehicle use occurred over deeper snow. Although it was acknowledged that snow depth can vary considerably during the fall or spring and that soil disturbance may occur in isolated areas without adequate snow depth, the minimum snow depth requirements for alternatives 2 to 5 coupled with existing regulations (e.g., 36 CFR part 261.15) would likely prevent any disturbances to soil that would result in measurable modifications to the habitats utilized by the California red-legged frog or Sierra Nevada yellow-legged frog. Lastly, it was assumed that over-snow vehicle operators would likely limit or avoid riding on soil devoid of snow to prevent damaging their machines, which would further reduce the likelihood of any disturbances to soil that would result in measurable modifications to aquatic habitats. To our knowledge, there is no published literature that contradicts this assumption. Comment A162-53: The species analyzed in the Final Environmental Impact Statement were those that could be potentially affected by the designated oversnow vehicle use based on their occupancy or the existence of their habitat in the affect boundary of at least one alternative. As a result, the analysis related to the Sierra Nevada yellow-legged frog within the Final Environmental Impact Statement does not represent any "position" that suggests over-snow vehicle use leads to the detriment of the species or its habitat. Although the Sierra Nevada yellow-legged frog may be directly affected by each of the alternatives, it was concluded that the proposed designated over-snow vehicle use areas among the alternatives would not likely result in measurable or significant disturbance to the species' habitat occurring in the Plumas National Forest. These conclusions were reached based on the best available scientific information derived from limited scientific investigation. |


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| Wildlife concerns | 72-45: LOP definition and monitoring plan. The FEIS should also clearly articulate what actions the PNF will take if disturbance is detected. <br> 72-47: the DEIS does not explain how the forest intends to protect high quality marten habitat and habitat connectivity. <br> 86-45: Forest Service fails to demonstrate how it minimizes harassment or harm to California Spotted Owl and Goshawk. <br> 86-64: should examine impacts to wildlife such as marten, fisher, California spotted owl, goshawk, mule deer, wolves and frogs at multiple scales <br> 86-65: the DEIS does not fully consider or quantify the impacts of the OSV designations given marten's vulnerability to human disturbance. <br> 86-66: Fisher <br> 86-68 and 69: Recommend OSV area and trail designations be designed to avoid important goshawk habitat. | A72-47: The Forest Service did not specifically consider the importance of protecting habitats that provide connectivity corridors, because The Forest Service did not find any strong evidence that OSV use would cause a measurable impact to species habitat in general. Therefore The Forest Service did not expand its analysis to specifically address connectivity corridors. IT can be inferred that OSV use would not impact habitat located in a "corridor" from the analysis already included in the FEIS. <br> Although the biologist identified the potential for OSV-use in the vicinity of occupied or suitable marten habitat could harass individuals (temporary dispersal away from activity), available research suggests that OHV/OSV use did not affect marten occupancy or probability of detection when overall use in the study area was low. Moderate to high use is expected to be minimal in each OSV-use area that contains suitable marten habitat. Furthermore the most potentially threatening disruption to the marten and their habitat is damage to, or loss of habitat. OSV's-use will not physically modify the vegetative structure or composition of any suitable marten habitat (including den sites) within the project area. Therefore because marten are unlikely to be disrupted by OSV-use and their habitats will not be affected, the proposed OSV-use designations ensure harassment to and destruction of marten habitat are minimized. For these reason, the location, and proposed OSV--usage in the OSV-use areas are appropriate, and each was recommended for designation without the need for additional mitigation. <br> A86-45: The 'minimization criteria' as defined by the travel management rule require that in designating NFS lands for OSV-use the responsible official "consider with the objective of minimizing: (2) Harassment of wildlife and significant disruption of wildlife habitats (36 CFR 212.55(b)(2)). The process of considering the effects of designating trails and areas for OSV use with the objective of minimizing the four categories of impacts set forth at 36 CFR 212.55(b)(1)-(4) is referred to as "applying the minimization criteria" (see Applying the Minimization Criteria and Other Specific Criteria section below and chapter 2). The Forest Service engaged in a thorough route-by-route and trail-by-trail consideration of the potential for OSV-use to cause impacts to Forest resources or conflicts between users within the areas and trails being considered for OSV-use designation. This process was conducted over 6 steps (as described in section 'Applying the Minimization Criteria and Other Specific Criteria' in Alternative Development of the FEIS). The information gathered during this process was used to inform the proposed OSV-use designations |


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| Wildlife concerns (continued) |  | and Decision and to ensure that impacts were minimized where necessary. It is important to note that applying the minimization criteria should not be interpreted as strictly requiring the prevention of all impacts. Instead, in applying the minimization criteria, the Forest Service maintains the flexibility to manage for a reasonable reduction of impacts while still addressing the need to provide trails and areas for public OSV experiences. This point is clarified in the preamble to the Travel Management Regulations Final Rule published on November 9, 2005: An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands. Neither E.O.11644, nor these other laws and policies, establish the primacy of any particular use of trails and areas over any other. The Department believes "shall consider * * * with the objective of minimizing * * *" will assure that environmental impacts are properly taken into account, without categorically precluding motor vehicle use. 70 FR 68281.The Terrestrial Wildlife analysis in the FEIS addresses the potential impacts of the proposed OSV-use designations various species, including California spotted owl and goshawk. <br> A86-64: The Travel Management Rule specifically states, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: (2) Harassment of wildlife and significant disruption of wildlife habitats;" The Ninth Circuit Court of Appeals has clarified that " [T]he TMR requires the Forest Service to apply the minimization criteria to each area (and trails) it designated for snowmobile use. [T]he Forest Service must apply the data it has compiled to show how it designed the areas (and trails) open to snowmobile use 'with the objective of minimizing' [the impacts set forth in 36 CFR 21.55(b)(1)-(4). . . . " WildEarth Guardians v. Montana Snowmobile Ass'n, 790 F.3d 920, 930 (9th Cir. 2015). The process and rationale concerning formulation and application of minimization measures is described in detail in the FEIS (Applying the Minimization Criteria and Other Specific Designation Criteria section and other various sections). Each of these sections demonstrates "how the Forest Service located the OSV-use trails and areas to minimize harassment of wildlife and significant disruption of wildlife habitat. Boundaries were modified and refined as information was gathered. No one resource alone influenced the boundaries of the OSV-use areas or the location of OSV-use trails. Discrete areas smaller than a Ranger District were identified as a first cut measure to refine our staff's "consideration" and Minimization Criteria Screening exercise. Every single acre of NFS land located within a potential OSV-use area boundary were screened by the aquatic and terrestrial wildlife biologists. This process allowed the biologists to identify where potential |


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| Wildlife concerns (continued) |  | impacts to wildlife as a result of OSV-use may occur. In order for a potential impact to occur, OSV-use must occur within suitable, occupied, or designated critical habitat. For locations where OSV-use would overlap with suitable, occupied, or designated critical habitat, additional screenings criteria were considered to determine, what the type of potential impacts that may occur, and the level of risk that OSV-use of these areas and trails may cause to a species and their habitat. For example, quantifying the area or miles of potentially impacted suitable, occupied, or designated critical habitat informed the level of risk to a species and influenced the likelihood or frequency of the impact occurring, and the need for mitigation. Also, instrumental in determining the location of designated OSV-use areas, was the consideration of known or anticipated OSV-use patterns including concentrated OSV-use areas or OSVuse play areas. Once all of these factors were taken into consideration, the biologist was able to determine whether harassment and significant disruption of wildlife habitat would be minimized and ultimately recommend whether OSVuse was appropriate to occur within a particular use area or along a potential OSV-use trail. It is important to note that the mere overlap between OSV-use and suitable, occupied, or designated critical habitat did not preclude an area or trail from being considered for OSV-use designation, nor did it automatically require a management requirement or specific minimization criteria/action to be prescribed/required. As described above, the type of potential impact, the level of overlap, the level of risk, and the anticipated OSV-use patterns and timing of the OSV-use occurring all factored into the biologists determination of whether the objective of minimizing harassment or wildlife and significant disruption of wildlife habitat would be met by designating OSV-use in specific areas, or along a specific trail. In some instances, despite overlap with suitable, occupied, or designated critical habitat and the potential for harassment or significant disruption of habitat to occur, after consideration of the level of risk of that harassment or disruption occurring, the intensity or duration of that impact occurring, and the timing of the impact occurring the biologist determined that the location and the proposed OSV-usage in a particular OSVuse area or along an OSV-use trail would meet the objective of minimizing harassment and disruption of wildlife habitat, and the OSV-use area or OSVuse trail was recommended for designation without the need for additional mitigation to minimize the risk. <br> A86-65: The Travel Management Rule specifically states, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: (2) Harassment of wildlife and significant disruption of wildlife |


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| Wildlife concerns (continued) |  | habitats;" The Ninth Circuit Court of Appeals has clarified that " [T]he TMR requires the Forest Service to apply the minimization criteria to each area (and trails) it designated for snowmobile use. [T]he Forest Service must apply the data it has compiled to show how it designed the areas (and trails) open to snowmobile use 'with the objective of minimizing' [the impacts set forth in 36 CFR 21.55(b)(1)-(4). . . " WildEarth Guardians v. Montana Snowmobile Ass'n, 790 F.3d 920, 930 (9th Cir. 2015). <br> The process and rationale concerning formulation and application of minimization measures is described in detail in the FEIS (Applying the Minimization Criteria and Other Specific Designation Criteria section and other various sections). Each of these sections demonstrates "how the Forest Service located the OSV-use trails and areas to minimize harassment of wildlife and significant disruption of wildlife habitat. Boundaries were modified and refined as information was gathered. No one resource alone influenced the boundaries of the OSV-use areas or the location of OSV-use trails. Discrete areas smaller than a Ranger District were identified as a first cut measure to refine our staff's "consideration" and Minimization Criteria Screening exercise. Every single acre of NFS land located within a potential OSV-use area boundary were screened by the aquatic and terrestrial wildlife biologists. This process allowed the biologists to identify where potential impacts to wildlife as a result of OSV-use may occur. In order for a potential impact to occur, OSVuse must occur within suitable, occupied, or designated critical habitat. For locations where OSV-use would overlap with suitable, occupied, or designated critical habitat, additional screenings criteria were considered to determine, what the type of potential impacts that may occur, and the level of risk that OSV-use of these areas and trails may cause to a species and their habitat. For example, quantifying the area or miles of potentially impacted suitable, occupied, or designated critical habitat informed the level of risk to a species and influenced the likelihood or frequency of the impact occurring, and the need for mitigation. Also, instrumental in determining the location of designated OSV-use areas, was the consideration of known or anticipated OSV-use patterns including concentrated OSV-use areas or OSV-use play areas. Once all of these factors were taken into consideration, the biologist was able to determine whether harassment and significant disruption of wildlife habitat would be minimized and ultimately recommend whether OSV-use was appropriate to occur within a particular use area or along a potential OSV-use trail. It is important to note that the mere overlap between OSV-use and suitable, occupied, or designated critical habitat did not preclude an area or trail from being considered for OSV-use designation, nor did it automatically require a management requirement or specific minimization criteria/action to be prescribed/required. As described above, the type of potential impact, the level |


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| Wildlife concerns (continued) |  | of overlap, the level of risk, and the anticipated OSV-use patterns and timing of the OSV-use occurring all factored into the biologists determination of whether the objective of minimizing harassment or wildlife and significant disruption of wildlife habitat would be met by designating OSV-use in specific areas, or along a specific trail. In some instances, despite overlap with suitable, occupied, or designated critical habitat and the potential for harassment or significant disruption of habitat to occur, after consideration of the level of risk of that harassment or disruption occurring, the intensity or duration of that impact occurring, and the timing of the impact occurring the biologist determined that the location and the proposed OSV-usage in a particular OSVuse area or along an OSV-use trail would meet the objective of minimizing harassment and disruption of wildlife habitat, and the OSV-use area or OSVuse trail was recommended for designation without the need for additional mitigation to minimize the risk. <br> A86-68 and A86-69: The Travel Management Rule specifically states, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: (2) Harassment of wildlife and significant disruption of wildlife habitats;" The Ninth Circuit Court of Appeals has clarified that "[T]he TMR requires the Forest Service to apply the minimization criteria to each area (and trails) it designated for snowmobile use. [T]he Forest Service must apply the data it has compiled to show how it designed the areas (and trails) open to snowmobile use 'with the objective of minimizing' [the impacts set forth in 36 CFR 21.55(b)(1)-(4). . . " WildEarth Guardians v. Montana Snowmobile Ass'n, 790 F.3d 920, 930 (9th Cir. 2015). The process and rationale concerning formulation and application of minimization measures is described in detail in the FEIS (Applying the Minimization Criteria and Other Specific Designation Criteria section and other various sections). Each of these sections demonstrates "how the Forest Service located the OSV-use trails and areas to minimize harassment of wildlife and significant disruption of wildlife habitat. Boundaries were modified and refined as information was gathered. No one resource alone influenced the boundaries of the OSV-use areas or the location of OSV-use trails. Discrete areas smaller than a Ranger District were identified as a first cut measure to refine our staff's "consideration" and Minimization Criteria Screening exercise. Every single acre of NFS land located within a potential OSV-use area boundary were screened by the aquatic and terrestrial |


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| Wildlife concerns (continued) |  | wildlife biologists. This process allowed the biologists to identify where potential impacts to wildlife as a result of OSV-use may occur. In order for a potential impact to occur, OSV-use must occur within suitable, occupied, or designated critical habitat. For locations where OSV-use would overlap with suitable, occupied, or designated critical habitat, additional screenings criteria were considered to determine, what the type of potential impacts that may occur, and the level of risk that OSV-use of these areas and trails may cause to a species and their habitat. For example, quantifying the area or miles of potentially impacted suitable, occupied, or designated critical habitat informed the level of risk to a species and influenced the likelihood or frequency of the impact occurring, and the need for mitigation. Also, instrumental in determining the location of designated OSV-use areas, was the consideration of known or anticipated OSV-use patterns including concentrated OSV-use areas or OSVuse play areas. Once all of these factors were taken into consideration, the biologist was able to determine whether harassment and significant disruption of wildlife habitat would be minimized and ultimately recommend whether OSVuse was appropriate to occur within a particular use area or along a potential OSV-use trail. It is important to note that the mere overlap between OSV-use and suitable, occupied, or designated critical habitat did not preclude an area or trail from being considered for OSV-use designation, nor did it automatically require a management requirement or specific minimization criteria/action to be prescribed/required. As described above, the type of potential impact, the level of overlap, the level of risk, and the anticipated OSV-use patterns and timing of the OSV-use occurring all factored into the biologists determination of whether the objective of minimizing harassment or wildlife and significant disruption of wildlife habitat would be met by designating OSV-use in specific areas, or along a specific trail. In some instances, despite overlap with suitable, occupied, or designated critical habitat and the potential for harassment or significant disruption of habitat to occur, after consideration of the level of risk of that harassment or disruption occurring, the intensity or duration of that impact occurring, and the timing of the impact occurring the biologist determined that the location and the proposed OSV-usage in a particular OSVuse area or along an OSV-use trail would meet the objective of minimizing harassment and disruption of wildlife habitat, and the OSV-use area or OSVuse trail was recommended for designation without the need for additional mitigation to minimize the risk. |


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| OSV Use - Bald Eagles | Comments in support of restricting OSV use | Thank you for your comment. |
| (Support) | in Bald Eagle areas | The bald eagle is managed as a Forest Service Sensitive Species and the |
|  | There is also the Eagle concern at Lake | FEIS explicitly presents management direction (volume I pages |
|  | Davis. Eagles have nested at Lake Davis for | $16,26,159,170,209 ;$ volume II pages 26,47), and tracks how the Forest Service |
|  | years and the noise and higher use created | shared information with and solicited input from stakeholders regarding bald |
|  | by groomed snowmobile trails, may impact | eagles near Lake Davis throughout the planning process (volume I pages |
|  | their ability to choose a nest site. Eagles | xv,11,25-26,42,192), while presenting issues, effects, monitoring, measures |
|  | usually choose nest sites in the winter when | and mitigations to minimize direct, indirect and cumulative effects across |
|  | snowmobiles would be creating a | alternatives (volume I pages, 16,27-29,31,35, 57,102,159,192-195,201,334) |
|  | disturbance. My understanding is this is the | and within each proposed open area and trail, including the Lake Davis area |
|  | most vulnerable time for the eagles whereas | and each proposed trail (volume II pages 70-512). The Forest Service worked |
|  | later in the season when they have | within its regulatory framework to protect bald eagles during the planning |
|  | established their nest and laid eggs they are | process, actively engaging stakeholders to minimize disturbance to eagles |
|  | much less likely to abandon it. | while promoting OSV use. |
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| OSV Use - Bald Eagle (NonSupport) | Comments that are not supportive of restricting OSV use in Bald Eagle areas. <br> 1) In the original scoping documents and meetings regarding the over snow vehicle regulations, the USFS presented a proposal that restricted snowmobile use around bald eagle nesting sites near Lake Davis. They were ostensibly following the National Bald Eagle Guidelines that require a 660 ft or 330 ft zone around each nest site where activities may be restricted. The public made many comments about these restrictions eventually convincing the USFS that there were NOT 18 pairs of eagles currently nesting at the lake, but rather 2. ('lll let you draw your own conclusion about whether the inclusion of 18 was an innocent mistake or something more sinister). Indeed, some of the nesting sites were in trees that the USFS later claimed "may not even be standing any longer" (quote from Lee Ann Schramel) once the Portola Post FOIA request for nest locations was filed. The responsive documents from our FOIA showed that some of the nest data they were counting on TO RESTRICT PUBLIC USE OF PUBLIC LANDS was from 1978. | 1, 5) Thank you for the comments. <br> 2) The bald eagle is managed as a Forest Service Sensitive Species and the FEIS explicitly presents management direction (volume I pages 17,28,164,176,216; volume II pages 26,47 ), and tracks how the Forest Service shared information with and solicited input from stakeholders regarding bald eagles near Lake Davis throughout the planning process (volume I pages $\mathrm{xv}, 11,27-28,45,199$ ), while presenting issues, effects, monitoring, measures and mitigations to minimize direct, indirect and cumulative effects across alternatives (volume I pages, 17,29-31,33,37,61,106,164,199-202,208,347) and within each proposed open area and trail, including the Lake Davis area and Round Valley Reservoir, and each proposed trail (volume II pages 70-512). The Forest Service worked within its regulatory framework to protect bald eagles during the planning process, actively engaging stakeholders to minimize disturbance to eagles while promoting OSV use. <br> 3) The Forest Service shared information with and solicited input from stakeholders regarding bald eagles near Lake Davis throughout the planning process, acknowledging these requests and outlining why the Responsible Official chose not to amend the plan (FEIS volume I pages xv,11, 27$28,45,47,199)$. <br> The Forest Service followed management direction (volume I pages $17,28,164,176,216$; volume II pages 26,47 ) and presented issues, effects, monitoring, measures and mitigations to minimize direct, indirect and cumulative effects across alternatives (FEIS volume I pages, 17,29-31,33,37, $61,106,164,199-202,208,347$ ) and within each proposed open area and trail, including the Lake Davis area and each proposed trail (FEIS volume II pages 70-512). The Forest Service applied law and direction appropriately, engaged all stakeholders throughout the planning process regarding eagle management in the Lake Davis area, and analyzed impacts to recreationists and eagles across a range of alternatives. |


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| OSV Use - Bald Eagle (NonSupport) (continued) | (The average lifespan of a bald eagle is 20 years; probably just another innocent mistake right?). Be that as it may, they still gave the public an opportunity to comment on their proposed restrictions following the National Bald Eagle Guidelines. Bravo they are following a process. However, a few weeks ago the draft DEIS came out. I encourage and ask each of you go and read the last two paragraphs of Page 11 and the first paragraph of Page 26 of the DEIS volume 1. You will see paragraphs that essentially state "whoops!! we screwed up! we have to follow the forest plan instead of the National Bald Eagle Guidelines." The problem is that the forest plan is significantly more restrictive than the National Bald Eagle Guidelines. In fact, it essentially closes ALL over snow vehicle use for the complete West Side of Lake Davis. Locals will recognize the map as the "Deb Bumpass Map" from years back when she tried to close the lake off to all of us. Background for those that don't know Deb Bumpass was an EXTREME environmentalist who would prefer the forest only be open to her and those she deemed worthy of being in the woods. I can provide a copy of the "Deb Bumpass Map" for those that don't have it, although I suspect many of you do. What you will find is that it almost perfectly overlays with the recent DEIS. Interesting coincidence? You must all ask yourselves, why was the public not allowed to comment during the scoping phase on such a draconian implementation of these rules? Probably just another "innocent" mistake right? | 4) Thank you for the comment. The Forest Service is always interested in acquiring the best available scientific information to inform management. |


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| OSV Use - Bald Eagle (Non- <br> Support) (continued) | In a recent conversation with Katherine Carpenter (David Wood's replacement) she said, "well you can comment now at this stage of the project". I'm sorry that is not good enough. Everyone involved knows that once a project gets to the DEIS phase, the fix is in. Snowmobile use on the West Side of Lake Davis has become de facto illegal. 2) Do not restrict OSV near Lake Davis because bald eagles are either not impacted by OSV use or not nesting where OSV use occurs, and permit OSV users to passthrough the Round Valley Reservoir bald eagle area. <br> 3) Amend the Plumas National Forest Land and Resource Management Plan to permit OSV use in bald eagle areas using a common sense approach. <br> 4) Encourage specific research to be performed to show whether OSV use impacts bald eagles. <br> 5) In the original scoping documents and meetings regarding the over snow vehicle regulations, the USFS presented a proposal that restricted snowmobile use around bald eagle nesting sites near Lake Davis. They were ostensibly following the National Bald Eagle Guidelines that require a 660 ft or 330 ft zone around each nest site where activities may be restricted. The public made many comments about these restrictions eventually convincing the USFS that there were NOT 18 pairs of eagles currently nesting at the lake, but rather 2. ('lll let you draw your own conclusion about whether the inclusion of 18 was an innocent mistake or something more sinister). |  |


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| OSV Use - Bald Eagle (NonSupport) (continued) | Indeed, some of the nesting sites were in trees that the USFS later claimed "may not even be standing any longer" (quote from Lee Ann Schramel) once the Portola Post FOIA request for nest locations was filed. The responsive documents from our FOIA showed that some of the nest data they were counting on TO RESTRICT PUBLIC USE OF PUBLIC LANDS was from 1978. <br> (The average lifespan of a bald eagle is 20 years; probably just another innocent mistake right?). Be that as it may, they still gave the public an opportunity to comment on their proposed restrictions following the National Bald Eagle Guidelines. Bravo they are following a process. However, a few weeks ago the draft DEIS came out. I encourage and ask each of you go and read the last two paragraphs of Page 11 and the first paragraph of Page 26 of the DEIS volume 1. You will see paragraphs that essentially state "whoops!! we screwed up! we have to follow the forest plan instead of the National Bald Eagle Guidelines." The problem is that the forest plan is significantly more restrictive than the National Bald Eagle Guidelines. In fact, it essentially closes ALL over snow vehicle use for the complete West Side of Lake Davis. Locals will recognize the map as the "Deb Bumpass Map" from years back when she tried to close the lake off to all of us. Background for those that don't know Deb Bumpass was an EXTREME environmentalist who would prefer the forest only be open to her and those she deemed worthy of being in the woods. I can provide a copy of the "Deb Bumpass Map" for those that don't have it, although I suspect many of you do. What you will find is that it almost perfectly overlays with the recent DEIS. Interesting coincidence? |  |


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| Wildlife - illegal killing | Comments concerned with illegal killing of wildlife. | Thank you for your comment. The illegal killing of wildlife, as described in your comment, is outside the scope of this analysis. |
| Soils/Hydrology/Vegetation DEIS Failures Alternatives 1, 2, and 4 | Comments that indicate the DEIS fails to demonstrate how Alternatives 1, 2 and 4 would minimize damage to soils, watershed and vegetation. | The FEIS and the hydrology specialist report document the effects on hydrology of the project. Thank you for your comment. |
| Comments referencing other comments | Comments that reference other comments. No further action required. | Thank you for your comment. <br> The Code of Federal Regulations specific to prohibitions defines damage as "means to injure, mutilate, deface, destroy, cut, chop, girdle, dig, excavate, kill or in any way harm or disturb" (36 CFR 261.2). The Travel Management Rule provides specific criteria for designation of trails and areas, focusing on natural and cultural resources, as follows (1) Damage to soil, watershed, vegetation, and other forest resources and (2) Harassment of wildlife and significant disruption of wildlife habitats (36 CFR 212.55(b)(1-2)). <br> During routine patrols, recreation personnel and forest protection officers monitor OSV use and document any signs of damage occurring to forest resources. Observations of the impacts identified, but not limited to, in the monitoring section of the FEIS (pages 33-36) would constitute resource damage. <br> Antelope and Frenchman open area boundaries follow Indian Creek where there are two locations that users can feasibly cross-Antelope Dam and Babcock Crossing. Davis and Frenchman open area boundaries follow a natural boundary as Red Clover Creek and Clover Valley is a large (7 miles) section of private land. The remainder of this boundary, about 5 miles, follows the Beckwourth-Genesee Plumas County road. There are limited crossings along this boundary as well-Knotson Bridge, Drum Bridge, a bridge at NFS road 25N05, and Plumas County road 177. At Janesville Grade specifically, there are no topographic features with the exception of Janesville Grade (NFS road 28N01 and Plumas County road 208). Topographic features were considered when identifying discrete open areas for this project. The following modifications were applied to the alternative 2 (modified proposed action). |


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| Comments referencing other comments (continued) |  | Bucks Lake Open Area <br> 1. From Plumas County Road 414, designate and groom 24N33 to the intersection of 24N89X; continue grooming 24N89X to the intersection of 24N89XA. This leads users away from the Bucks Lake Wilderness boundary, provides a longer groomed OSV trail and a safe turn around location for the grooming machine. These NFS roads and segments were added to appendix C of the FEIS and minimization criteria was evaluated for each. <br> A version of the NFS 24N33 road was considered in Alternative 4 with inaccurate data from Infra and outdated road location information. Knowledge of road location on the landscape informed us that 24 N33 was rerouted into 24N89X and that the 24N33A (spur) no longer exists. <br> 2. Remove proposed designated OSV open areas west of Bucks Lake. Prohibit OSV use west of NFS road 24 N24, and $24 N 35$ and $24 N 25 Y$ (considered two unique areas adjacent to one another), north of 24 N 34 . These areas receive little to no OSV use due to steep terrain and risk of avalanches. <br> 3. Redraw proposed designated OSV open area in the Yellow Creek area of the Chips Creek Roadless area northwest of Bucks Lake Wilderness. Redraw open area to NFS road 26N26 and ridge above 26N26. Limiting the OSV open area to the ridge removes a steep slope that provides access to a creek. This is not a high use or value area for OSV use. <br> 4. Remove proposed designated OSV open area north of Indian Creek in the Chips Creek Roadless area. Removing this small open area protects the semiprimitive nature of the Chips Creek Roadless area. <br> 5. Remove proposed designated OSV open area in and around the Gold Lake ski trail, adjacent to the Gold Lake staging area, including Gray Eagle Creek (NFS lands west of Plumas County Road 519). The area removed extends from the southern edge of private land near Graeagle, Gray Eagle Creek, the Gold Lake ski trail, and NFS lands that reach the Graeagle Lodge. NFS lands east of Plumas County Road 519 are generally designated as open. This change separates motorized and non-motorized uses, such that OSVs are not crossing or using a non-motorized trail or Gray Eagle Creek. <br> Lakes Basin Open Area <br> 1. Redraw open area in Lakes Basin. Propose designation of open area from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and use ridge toward Graeagle Lodge as boundary change. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. <br> 2. Propose designation of NFS lands in section 3 nearest to "A Tree" adjacent to the Tahoe and Plumas National Forests administrative boundary. |


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| Comments referencing other comments (continued) |  | 3. Adding section 3 near A Tree allows for motorized use from the Tahoe onto the Plumas and provided connectivity from NFS road 23N08 onto Plumas County Road 507. These roads provide access to the larger La Porte open area, La Porte, and Onion Valley. <br> 4. Remove proposed designated open area in sections 29 and 32 near A Tree Campground in between McRae Ridge and NFS road 23N08, and immediately adjacent to the La Porte and Lakes Basin open area unit boundary. <br> 5. Remove proposed open area designation in section 33 to provide contiguous areas not designated for OSV use within sections 32, 33, and 34 as this has high value to non-motorized users. Designation of NFS Road 23N08 allows OSV access through the closed area from Lakes Basin to La Porte. Designate NFS road 23N08 as an ungroomed OSV trail to provide access across undesignated NFS lands between open areas, and to provide access to open areas from Sloat. Designation of NFS road 23N08 overlies Lakes Basin and La Porte open areas. <br> La Porte Open Area <br> Just north of Harrison Campground, redraw the open boundary to include NFS 23N10 extreme eastern portion of the road. Insignificant change for motorized uses, portion of SIA that would become open is extremely steep and densely vegetation and would not likely receive OSV use. <br> Davis Open Area <br> Designate NFS lands just south of Indian Valley, towards the east near Iron Dyke, along Plumas County Road 208. Designate NFS lands on the eastern edge of Greenville overlaying with NFS road 28N32. This addition provides connectivity from private land and NFS lands proposed for designation for cross-county OSV travel. <br> Antelope Open Area <br> Designate NFS lands along North Arm in Indian Valley south of Engel Mine to provide access from private land to designated NFS lands as open areas allowing cross-country travel. |


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| Comments referencing other comments (continued) |  | Pacific Crest Trail Areas Not Designated for OSV Use <br> Seventy-nine miles of the Pacific Crest Trail cross the Plumas National Forest administrative boundary from the Lassen to the Tahoe National Forests. Almost 18 miles of the PCT overlie designated wilderness or special areas, leaving just over 61 miles of PCT to evaluate the purpose and nature of the trail and use of over-snow vehicles. <br> An area not designated for OSV use is not applied when the PCT overlies and is adjacent to undesignated NFS lands or when NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT. Undesignated NFS lands do not authorize OSV use on or adjacent to the PCT and areas not designated for OSV use adjacent to the PCT are not necessary. NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT within the 500-foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> An area not designated for OSV use is applied at Bucks Summit, a congested, high-use staging area; the eastern side of the Middle Fork Wild and Scenic River to provide a noise buffer; and from the general area of Onion Valley to McRae Ridge to include the preservation of historic ski trails. <br> Bucks Summit <br> 1. From Bucks Summit staging area off of Plumas County Road 414, heading south along the PCT, increase areas not designated for OSV use in between two designated and groomed OSV trails: NFS roads 24 N 29 Y and Plumas County Road 119 (Big Creek Road). On the west side of the PCT, the area not designated for OSV use starts along the ridge in between NFS road 24N29Y and the PCT. On the east side of the PCT, the area not designated for OSV use extends from the Bucks Summit trailhead to the Plumas County Road 119. NFS lands adjacent to Plumas County Road 414 near Deadwood Creek and adjacent to private lands were also included in the areas not designated for OSV use. <br> The Bucks Summit trailhead receives both non-motorized and motorized uses. The areas not designated for OSV use provide a noise barrier along the PCT in a congested area. This segment of the PCT provides about 3 miles of gentle terrain to the south of Bucks Summit. |


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| Comments referencing other comments (continued) |  | Intersection of NFS road 24N29Y and Plumas County Road 119 (Big Creek Road) to Lookout Rock <br> 1. Remove entire areas not designated for OSV use adjacent to PCT because motorized roads and trails intersect and parallel the PCT within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> Lookout Rock to Butte Bar Campground <br> 1. Remove entire areas not designated for OSV use adjacent to the PCT because a buffer or zone in this section of the PCT is not necessary since it overlies NFS lands that are not designated for cross-country OSV travel. This area is also a Semi-Primitive area ( $\mathrm{Rx}-8$ ) from the 1988 Plumas National Forest LRMP, and there are very few existing roads. There are no roads or motorized trails in the vicinity of the PCT. <br> Butte Bar Campground to southeast corner of section 1 (T22N, R8E) <br> 1. Remove entire areas not designated for OSV use adjacent to the PCT because this section of the PCT overlies NFS lands that are not designated for cross-county OSV travel. <br> Southeast corner of section 1 to intersection with NFS road 22N56 <br> 1. Remove areas not designated for OSV use adjacent to PCT because NFS roads (23N65Y, 23N65YB, and 22N56) parallel the PCT within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> Intersection with NFS road 22N56 to east side of private land in section 11 (T22N, R8E) <br> The Fowler Lake area overlaps with a Special Interest Area or Research Natural Area and overlies NFS lands that are not designated for cross-country travel, so a non-motorized buffer is not necessary within the Fowler Lake SIA. Two parcels of private land overlie the PCT and are not designated for crosscountry travel. Areas not designated for OSV use are not necessary in these locations. |


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| Comments referencing other comments (continued) |  | 1. Remove the areas not designated for OSV use adjacent to the PCT from the intersection of NFS road 22N56 and then again from the eastern edge of the SIA/RNA to the eastern edge of the private land parcel in section 11. There are roads adjacent to PCT in Section 15 and there is no non-motorized continuity in this area between the private parcels. <br> Private land in section 11 to intersection of Plumas County Road 511 (Forest Highway 120) <br> 1. Remove areas not designated for OSV use adjacent to the PCT because two designated, groomed trails (NFS road 22N60 and Plumas County Road 120 ) crisscross and parallel the PCT. These roads are within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> Plumas County Road 511 to Intersection of Plumas County Road 507 and NFS Road 22N46 <br> 1. Remove areas not designated for OSV use from County Road 511 to the PCT's intersection with NFS Road 22N82X. <br> 2. Maintain areas not designated for OSV use adjacent to the PCT at the intersection with NFS Road 22N82X, around the northeast side of Pilot Peak, and adjacent to the PCT along Bunker Hill Ridge, southeast to where the PCT is within the Semi-primitive Prescription (RX-8). A widened area not designated for OSV use along the PCT both meets the nature and purpose of the trail, and recognizes historic uses of the trail as the 'Lost Sierra Ski Traverse'. <br> NFS Road 22N46 to Tahoe National Forest (administrative boundary) <br> 1. Remove areas not designated for OSV use adjacent to PCT because the PCT parallels NFS 22N46 and then crisscrosses two national forest administrative boundaries numerous times. Generally, NFS lands are designated as open on both national forests; the Tahoe National Forest selected alternative does not include areas not designated for OSV use adjacent to the PCT. Given the PCT crisscrosses administrative boundaries, areas not designated for OSV use adjacent to the PCT in only the Plumas National Forest results in fragments of non-motorized areas that are impractical for implementation. |


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| Comments referencing other comments (continued) |  | General Changes <br> 1. Generally, remove designated ungroomed OSV trails that overlap with open areas. All designated ungroomed OSV trails that cross private ownerships, restricted and prohibited areas, or connect open areas should remain for designation to illustrate the trail is needed to access an otherwise prohibited or restricted area. <br> 2. Our current action alternatives include county roads as proposed designated NFS OSV trails and in most cases grooming. Based on current jurisdiction in Infra, these roads are not aligned with Travel Management Rule, Subpart C regulations, such that the Forest Service should not designate county roads as NFS OSV trails. Remove county roads, with county jurisdiction, from all action alternatives, from proposed designation as NFS OSV trails. <br> Maintain county roads, with county jurisdiction, in all action alternatives that are proposed for grooming. These will be displayed on our alternative maps as "other groomed OSV trails" and will not be designated as NFS OSV trails. <br> 3. Change vehicle class definition from width to pounds per square inch. Vehicle class is now defined by the ground pressure exerted by different types of OSVs to better align with potential resource impacts (as heavier vehicles create deeper tracks and can potentially cause resource damage). The revised Class 1 OSVs include those that typically exert a ground pressure of 1.5 pounds per square inch (psi) or less. This class includes snowmobiles, tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked utility terrain vehicles (UTVs), and snow-cats. The revised Class 2 OSVs include those that typically exert a ground pressure of more than 1.5 psi . This class includes tracked fourwheel drive (4WD) sport utility vehicles (SUVs) and tracked 4WD trucks. Class 1 will be able to operate on areas and trails designated for OSV use while Class 2 will be restricted to designated OSV trails available for grooming." <br> 4. Miscellaneous parcels of NFS land that were inaccessible islands were deleted. |
| Travel Management General | General comments about travel management, subpart C. | No further action required. Comments are general in nature or are a position statement. |


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| Recreation - Pro OSV and Skier | General comments supporting recreation for both OSV and skier. | The preamble to the Multiple-Use Sustained-Yield Act of 1960 states, "An act to authorize and direct that the national forests be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes". Under the multiple-use principle the Forest Service manages winter uses to protect National Forest System (NFS) resources and to provide a range of opportunities for motorized and non-motorized recreation. National Forests should provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. The National Forest System (NFS) lands are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the NFS lands to provide different opportunities for recreation. <br> The criteria for designation of roads, trails, and areas for OSV use in the Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts (36 CFR $212.55(\mathrm{~b})$ and 212.81 (d)). Though some commenters believe that motorized and non-motorized forms of over-snow recreation are compatible, other commenters strongly believe that the two forms of winter recreation are conflicting and incompatible. <br> Conflicts can be present without direct physical encounters, and may be occurring without the knowledge of the party causing the conflict. Not everyone sees conflicts in the same way. Non-motorized recreationists can choose to use the OSV designated areas if they are not concerned about conflicts. Minimization criteria and issues other than or in addition to user conflicts were factors considered when determining which areas to designate or not designate for OSV use in each alternative. <br> Six alternatives were developed that provide a range in the size and locations of OSV designated areas and trails. The differences in resource and social effects between the alternatives will be considered by the responsible official in the decision-making process. The indicators, measures, and methodology regarding the analyses for motorized and non-motorized recreation opportunities, including user conflicts was disclosed in the FEIS (volume I page 15-16) and elaborated on throughout the Recreation and Noise sections of FEIS in Chapter 3. |


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| OSV Use - Lakes / Open Water | OSV use on frozen lakes is not prohibited in the DEIS document, but appear to be excluded on the DEIS maps. | Thank you for your comment. <br> The Travel Management Rule, Subpart C-Over-Snow Vehicle Use, states "...over-snow vehicle use on NFS roads, trails, and in areas on NFS lands shall be designated by the Responsible Official..." (26 CFR 212.81(a)). Open flowing water, lakes, streams, rivers, creeks, etc. even when frozen are prohibited from OSV use for safety and water quality (FEIS, Appendices C and D). The purpose of this project is to designate NFS lands for OSV use, not open flowing or frozen water bodies. <br> The communities of Portola and Greenville receive their municipal water supply from Lake Davis and Round Valley Reservoir, respectively. The last Chance Creek Water District and Mill Race provide municipal water supplies to Sierra Valley and Taylorsville from Frenchman Lake and Indian Creek, respectively. The Federal Energy Regulatory Commission (FERC) developed a safety signage at hydroelectric projects document in October 2001. Commission staff inspects approximately 2,600 hydroelectric facilities each year. The objective is to identify potential hazards and require that appropriate safety measures be in place, before accidents occur. Each projects plan to address these potential dangers, through the use of signed and other devices is unique (page 5). Pacific Gas and Electric Company and California Department of Water Resources administered reservoirs authorized by FERC post signs allowing or prohibiting access onto and across frozen reservoirs. These bodies of water are not Forest Service jurisdiction and therefore cannot be designated as NFS open areas for OSV use. |
| Use of Areas - Non Motorized | Comments about the availability of nonmotorized use areas. | No further action required. Position statement. |
| No Further Response Required - Position Statement | Comment that require no further action | No further response required. General in nature or position statement. |
| Social Effects | Comments on the social effects of OSV use. | The effects to social values are considered in the Values, Beliefs and Attitudes section of the socioeconomic analysis. The Values, Beliefs and Attitudes section was modified to include the consideration of effects to social bonding and community relationships. |


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| OSV Seasons of Use / Timing Restrictions | We ask that the PNF consider how season dates could also be utilized to further comply with these BMPs as part of the overall goal of minimizing impacts to forest resources. Recent research examining early season snowpack loss in the Sierra Nevada, and implications that these changes have for OSV travel planning indicates that the onset of the over-snow recreation season in the Sierra has shifted by approximately 2 weeks. $11[\ldots] 11$ Hatchett, B. J. and Eisen, H. G.: Brief Communication: Early season snowpack loss and implications for oversnow vehicle recreation travel planning, The Cryosphere: 13, 21-28, 2019 https://doi.org/10.5194/tc-13-21-2019 Set an OSV use season of December 1 April 30. * Incorporate adaptive management into the travel plan so that the plan is flexible and responsive to "abnormal" winters and snow conditions. | The Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires that, "Over-snow vehicle use on National Forest System roads, on National Forest System trails, and in areas on National Forest System lands shall be designated by the Responsible Official on administrative units or Ranger Districts, or parts of administrative units or Ranger Districts, of the National Forest System where snowfall is adequate for that use to occur, and, if appropriate, shall be designated by class of vehicle and time of year..." (36 CFR 212.81(a)). Use of snow depth and elevation are reasonable ways to identify areas with adequate snowfall. There is no specification within the Travel Management Rule, Subpart C of how adequate snowfall be defined. In some parts of the country, season of use is used, while in other areas, elevation and snow depth are more reliable indicators. Implementation of a season of use on the Plumas National Forest would not be a reliable indicator in years when abundant snowfall or very little snowfall occurs, because it would either limit non-OSV motorized use in dry years, or it would limit OSV use in abundant snow years when adequate snow may fall earlier or later than the season of use. Snow depth and elevation restrictions are an adequate means by which to measure "adequate snowfall" for the Plumas NF. Snow depth considerations used during alternative development are described in chapter 2 of the FEIS under Alternative Development. The Forest Service uses best available scientific information in environmental analysis and decision-making. The FEIS identifies potential impacts from OSV use on terrestrial and aquatic wildlife and botanical resources as significant issues. Impacts on these resources are related to various snowpack conditions, including snow depth. The action alternatives consider various snow depths to minimize impacts to forest resources. <br> Best available science related to snow depth is used in analyzing the effects of the alternatives on affected resources, including water and soil resources, terrestrial wildlife habitat, and aquatic wildlife species. In general, a greater snow depth reduces the risk of OSV use adversely impacting resources under the snow. The current scientific literature does not provide a definitive answer for establishing specific snow depth thresholds at which impacts to various resources will occur. However, one can assume a relationship between snow depth and risk of adverse impacts: the risk of adverse impacts generally increases as snow depth decreases. <br> Compliance monitoring and Enforcement is outlined in the FEIS, Chapter 2, under the Monitoring section. Monitoring would cover both snow depth and resource conditions, while enforcement actions (including education, warnings, and citations) would consider multiple factors including OSV designations, snow depth, and the occurrence of resource damage. |


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| Snow Depth - Operational Limitations | Minimum snow depths are unnecessary, as to operate properly, a snowmobile engine requires cooling and the track hyfax requires lubrication. If any one of these requirements are not met, the machine will quickly become inoperable. Therefore, minimum snow depths are unnecessary, as the machines are self-regulating. | Alternative 4 of the FEIS analyzed a minimum snow depth requirement only in designated cross-country OSV use areas, but no minimum snow depth on trails, either groomed or ungroomed. The Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires that, "Over-snow vehicle use on National Forest System roads, on National Forest System trails, and in areas on National Forest System lands shall be designated by the Responsible Official on administrative units or Ranger Districts, or parts of administrative units or Ranger Districts, of the National Forest System where snowfall is adequate for that use to occur, and, if appropriate, shall be designated by class of vehicle and time of year..." (36 CFR 212.81(a)). A restriction of snow depth and elevation were used to establish areas where adequate snowfall will occur. Snow depth considerations used during alternative development are described in chapter 2 of the FEIS under Alternative Development. The Forest Service uses best available scientific information in environmental analysis and decision-making. The FEIS identifies potential impacts from OSV use on terrestrial and aquatic wildlife and botanical resources as significant issues. Impacts on these resources are related to various snowpack conditions, including snow depth. The action alternatives consider various snow depths to minimize impacts to forest resources. |
| Snow Depth - Limits Access | Minimum snow depths would severely curtail access to the Forest and the number of days open to snowmobiling. Parking lot trail heads are an important example of the network effect and the risks of a one-depth-fits-all rule for trails. Most snowmobile use starts with the rider getting on his or her snowmobile at the edge of a parking lot and starting off on a trail (often a designated trail) leaving the lot. A six inch minimum could easily result in a ruler being stuck in the compacted (and thus very protective) and regularly used snow as a trail leaves the parking lot, resulting in a closure preventing access to much of the Forest. | Alternative 4 of the FEIS analyzed a minimum snow depth requirement only in designated cross-country OSV use areas, but no minimum snow depth on trails, either groomed or ungroomed. The Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires that, "Over-snow vehicle use on National Forest System roads, on National Forest System trails, and in areas on National Forest System lands shall be designated by the Responsible Official on administrative units or Ranger Districts, or parts of administrative units or Ranger Districts, of the National Forest System where snowfall is adequate for that use to occur, and, if appropriate, shall be designated by class of vehicle and time of year..." (36 CFR 212.81(a)). A restriction of snow depth and elevation were used to establish areas where adequate snowfall will occur. Snow depth considerations used during alternative development are described in chapter 2 of the FEIS under Alternative Development. The Forest Service uses best available scientific information in environmental analysis and decision-making. The FEIS identifies potential impacts from OSV use on terrestrial and aquatic wildlife and botanical resources as significant issues. Impacts on these resources are related to various snowpack conditions, including snow depth. The action alternatives consider various snow depths to minimize impacts to forest resources; however a minimum snow depth is key to ensuring protection of underlying resources |


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| Snow Depth - Limits Access (continued) |  | The four main staging areas that access groomed trails within the Plumas National Forest boundaries (Bucks Summit, La Porte, Big Creek, and Gold Lake) all access groomed OSV trails where there has already been a historic established snow depth minimum of 12-18 inches required by California State Parks OHVMR Division to groom these trails. None of the action alternatives change the required minimum on groomed trails. A minimum snow depth is necessary to ensure protection of underlying resources. |
| 12-inch Snow-Depth Requirement | Comments about 12-inch snow depth requirement. | Thank you for your comment. <br> There is little scientific support for defining a universal, nationwide snow depth for protecting multiple resources. This is due to the variable nature of snowpack, and differences that occur regionally and nationally. For example, Maritime snowpacks, which form in the mountains closest to the ocean such as the Sierra Nevada and Cascades, are deep, warm, and dense with more moisture. Maritime snowpacks, like those found on the Plumas National Forest, exhibit the greatest snow depths, shortest accumulation periods, fastest snowmelt rates, and earliest onset of snowmelt annually (Trujillo and Molotch 2014). <br> The interdisciplinary team agrees that designating a minimum snow depth requirement when considering areas to designate for OSV use was mutually beneficial and provided a means to minimize resource damage. Designating a minimum snow depth requirement provides a quantifiable and tangible mechanism for managing when OSV use occurs during times of the year when snow depths are most variable. Minimum snow depth provides a way to ensure adequate snow is present before OSV use occurs. The minimum snow depth is included in each alternative to minimize potential effects to resources. If the Plumas National Forest includes a 12 -inch or greater minimum snow depth requirement for each OSV-use area and trail designation proposed across the alternatives, no historic properties would be affected under these conditions as per the provisions of the Programmatic Agreement. This "no effect" determination eliminates the need to survey all unsurveyed terrain in this project area and the need for additional formal consultation with the SHPO under Section 106. <br> The surest way to avoid causing damage to an OSV and resource damage, is to operate an OSV when the snowpack is greatest. For this reason, a minimum snow depth requirement would alter an OSV user's season of use very little. The Forest Service recognizes the concerns of OSV users, groups, alliances, and networks. It is the responsibility of the responsible official to designate a system of OSV trails and areas with the objective of minimizing damage to soils, water, vegetation, and cultural resources; harassment of wildlife; and significant disruption of wildlife habitat. We believe that inclusion of a minimum snow depth requirement contributes to ensuring the minimization criteria are met (FEIS, Chapter 2, pages 20-21). |


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| 12-inch Snow-Depth Requirement (continued) |  | Data from the National Weather Service's National Operational Hydrologic Remote Sensing Center were also used to evaluate snowpack trends on the Plumas National Forest. In general, adequate snow occurs in most years above 5,000 feet in elevation with a deeper snowpack evident above 6,000 feet in elevation. On the Plumas NF, precipitation often falls as rain below 5,000 feet, even during the winter months. In some years, adequate snow occurs at lower elevations ( 3,500 feet), although snow usually does not persist for long at lower elevations because the temperatures are too warm, particularly on slopes with a southerly aspect. Businesses are planned, developed and sustained based on reasonably predictable consistent business patterns. While forest lands under 5,000 feet elevation may receive irregular snow storms that provide winter recreation opportunities, these events are not consistent and reliably predictable such as to model or sustain a business or plan consistent and regular gatherings where snowpack is a required attribute. Therefore, areas above 5,000 feet elevation, with less than 70 percent canopy closure on slopes less than 21 percent are considered as predictable highquality predictable snow play areas. Effects to social and economic conditions will be analyzed in part based on the change in acreage of reasonably predictable high-quality OSV areas from the no action alternative. These areas are referred to as high quality OSV areas in this analysis (FEIS, page 297). In the Federal Outdoor Recreation Trends: Effects on Economic Opportunities working paper by Eric White, and J.M Bowker et al. (2014), the results of projections in 17 outdoor recreation activities were presented. These projections were developed from a model created for the 2010 Resources Planning Act applied in combination with information on changing land use, demographics, and climate data to model future recreation participation were outdoor recreation activities including OSV and non-motorized snow based recreation. It is estimated that in 2008, 4 percent of the nation's population participated in OSV use. OSV use is projected to have one of the largest declines in participation rates, declining by 10 percent of current users by 2030 (citation) down to a participate rate of 3.6 percent. The study notes that OSV recreation is limited to adequate snow conditions and recreation opportunities. Regarding non-motorized winter activities for "undeveloped skiing," specifically cross-country skiing and snowshoeing, it is estimated that 3.3 percent of the nation's population currently participate in non-motorized snow recreation. Looking out to 2030, the participation rate is expected [CKA-1] to remain at <br> 3.3 percent; however, days per participant are expected to increase slightly (FEIS, page 309). |
| OSV Use - Position Statement | General comments about OSV use | No Further Action Required. Comments are general in nature and are position statements. |
| Forest Plan Revision and Wilderness | Comments regarding forest plan revision and wilderness analysis | No further action required, Comments are general in nature and are position statements. |


| Concern Category | Concern Statement | Concern Response |
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| Wilderness - General | General comments about wilderness | No further action required, Comments are general in nature and are position statements. |
| Wilderness - Impacts to Future Designation | The Forest Service fails to consider how the proposed OSV designations might prejudice the future wilderness recommendation process. The Wilderness Society has documented the wilderness characteristics of 344,343 acres across the forest. Designating some of these areas as open to OSV use degrades their naturalness and other ecological values, diminishes opportunities for solitude and primitive recreation, and vastly reduces the likelihood that the Forest Service would recommend the areas or that Congress would eventually designate them as wilderness. <br> Rather than providing the required robust analysis described above, the Forest Service gives a relatively cursory discussion of how OSV designations near wilderness boundaries will harm or detract from wilderness attributes. See, e.g., DEIS at 107108 (describing short-term impacts from Alternative 2 to solitude in wilderness). The analysis also does not adequately consider wilderness characteristics outside designated wilderness. | Designated Wilderness <br> Motorized use within designated Wilderness areas is prohibited by the Wilderness Act of 1964, as noted in the FEIS (volume I page 88). The proposed OSV designations are consistent with the Wilderness Act and Forest Plan direction for designated Wilderness. <br> The actions proposed in the Plumas OSV designation project would not reduce or change any recreational activities within Designated Wilderness. <br> The FEIS discloses the proximity of trails and areas designated for OSV use to Wilderness areas and compares this across alternatives. Alternative 3 <br> proposes the least with 225 acres of OSV designations within $1 / 4$ mile of Wilderness, and Alternative 4 proposes the most acreage ( 4,646 acres) within $1 / 4$ mile of Wilderness (FEIS volume I page 55). <br> Appropriate minimization criteria were applied, see criteria 3 (volume I page 23) Monitoring of Wilderness boundaries is addressed in the FEIS (volume I page 35) <br> Inventoried Roadless Areas <br> The 2001 Roadless rule prohibits road construction and road re-construction in inventoried roadless areas (36 CFR 294.12) and prohibits timber cutting, sale, or removal in inventoried roadless areas (36 CFR 294.13). There are no prohibitions against allowing motorized use within IRAs in the Roadless Rule. The FEIS cites the Roadless Rule which defines the roadless area characteristics at 36 CFR 294.11: <br> (1) High quality or undisturbed soil, water, and air; (2) Sources of public drinking water; (3) Diversity of plant and animal communities; (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land (5) Primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation; (6) Reference landscapes; (7) Natural appearing landscapes with high scenic quality; (8) Traditional cultural properties and sacred sites; and (9) Other locally identified unique characteristics <br> The FEIS discloses impacts to the roadless characteristics of 1 ) undisturbed soil, water, and air (short-term impacts to air quality due to the presence of OSV exhaust), and (2) solitude (due to the sights and sounds of OSVs) (FEIS page 55 , summary table and throughout the recreation analysis). |


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| $\begin{array}{l}\text { Wilderness - Impacts to } \\ \text { Future Designation } \\ \text { (continued) }\end{array}$ |  | $\begin{array}{l}\text { Although not specifically aggregated under the Inventoried Roadless Area } \\ \text { heading, the FEIS addresses potential impacts to air quality, hydrology, soils, } \\ \text { terrestrial wildlife, aquatics, botany and cultural resources for each of OSV } \\ \text { areas proposed for designation, including those portions of IRAs that are } \\ \text { proposed for OSV designation. } \\ \text { Appendices D and E of volume II of the FEIS disclose area and trail analysis } \\ \text { for minimization criteria (b)(3) Minimize conflict between motor vehicle use and } \\ \text { existing or proposed recreational uses of NFS lands or neighboring Federal }\end{array}$ |
| lands, documentation for potentially affected IRA is included. |  |  |
| Due to the temporal nature of OSV use and the lack of on-the-ground imprints |  |  |
| after snow melt, designating where OSVs could operate on the Plumas NF |  |  |
| would not preclude any area from being considered for wilderness in the future. |  |  |$\}$| Wilderness Inventory under the 2012 Planning Rule and Citizen's |
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| Wilderness Inventory |


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| New Alternative - Wilderness | We urge the forest to consider our methodology and results in this winter travel planning process, including by analyzing at least one alternative that would not designate any areas in TWS's inventory as open to OSV use, and modifying Alternative 2 to not designate any existing Inventoried Roadless Areas (IRAs) as open to OSV use. Such alternatives are necessary to ensure that the Forest Service minimizes impacts to wilderness-quality lands and does not shortcircuit or prejudice the mandatory wilderness recommendation process that will occur during the Plumas' forest plan revision. | Scoping for the Plumas National Forest Over-snow Vehicle Use Designation Project began in November, 2015. The public was able to submit comments on the Proposed Action at any point from that point on; however, the Interdisciplinary team did not receive the TWS inventory from the Wilderness Society until July 13, 2018, when the TWS inventory was sent to the Plumas Forest Supervisor at the time, Daniel Lovato. The Wilderness Society requested in their letter that the inventory they provided be incorporated into the analysis and an alternative developed that would not designate any of the TWS inventory. The effects analysis for the FEIS was already underway at that point, and due to court-mandated timelines for the FEIS, it was not feasible to incorporate the TWS inventory into the analysis, nor develop an additional alternative. <br> Although not all of the TWS wilderness-eligible inventory submitted to the Forest Service is incorporated into any of the alternatives, a large portion of the TWS inventory is incorporated into various alternatives for lands not designated for OSV use. Under alternative 2-modified of the FEIS, a total of 324,199 acres outside of wilderness and private land is not proposed for designation for OSV use, which includes 40 percent of TWS's wilderness-eligible inventory (136,729 of 344,343 acres). Under alternative 3 of the FEIS, a total of 583,050 acres outside of wilderness and private land is not proposed for designation for OSV use, which includes 48 percent of TWS's wilderness-eligible inventory $(177,376$ of 344,343 acres). Under alternative 5 of the FEIS, a total of 531,860 acres outside of wilderness and private land is not proposed for designation for OSV use, which includes 52 percent of TWS's wilderness-eligible inventory (164,298 of 344,343 acres). <br> The 2001 Roadless rule prohibits road construction and road re-construction in Inventoried Roadless Areas (IRAs) (36 CFR 294.12) and prohibits timber cutting, sale, or removal in Inventoried Roadless Areas (36 CFR 294.13). However, there are no prohibitions against allowing motorized use within IRAs in the Roadless Rule. The FEIS discloses impacts to the roadless characteristics of 1) undisturbed soil, water, and air (short-term impacts to air quality due to the presence of OSV exhaust), and (2) solitude (due to the sights and sounds of OSVs) (FEIS, volume I Chapter 2, Alternatives summary table and throughout the Recreation Section). Although not specifically aggregated under the Inventoried Roadless Area heading, the FEIS addresses potential impacts to air quality, hydrology, soils, terrestrial wildlife, aquatics, botany and cultural resources for each of OSV areas proposed for designation, including those portions of IRAs that are proposed for OSV designation. Appendices D and E of volume II of the FEIS disclose area and trail analysis for minimization |


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| New Alternative - Wilderness (continued) |  | criteria (b)(3) Minimize conflict between motor vehicle use and existing or proposed recreational uses of NFS lands or neighboring Federal lands, documentation for potentially affected IRA is included. Due to the temporal nature of OSV use and the lack of on-the-ground imprints after snow melt, designating where OSVs could operate on the Plumas NF would not preclude any area from being considered for wilderness in the future. The Wilderness Inventory process under the 2012 Planning Rule (FSH 1909.12-70 Wilderness) includes the following inventory criteria: Include an area in the inventory when: 1 . The area meets the size criteria defined in section 71.21 and has no improvements; or 2 . The area meets the size criteria defined in section 71.21 and is consistent with the improvements criteria defined in sections 71.22 a and 71.22 b . Motorized OSV use over-snow, when snow depth is adequate for that use to occur would not be considered an improvement and would not degrade or disqualify the area for consideration in subsequent wilderness inventory processes. <br> The Semi-Primitive Area Prescription (Rx-8) in the Plumas LRMP and IRAs (RARE II) generally overlap. Under Alternative 5 OSV use was excluded from all Semi-Primitive Prescription areas (Rx-8) and IRAs; however, a few small areas were placed back in for connectivity for historic OSV use. Alternative 2 of the FEIS has been modified to prohibit OSV use in the entire Adams Peak IRA to protect non-motorized characteristics. Only a small portion of this area was open to OSV use in Alternatives 2 and 5 in the DEIS, and these small areas would now be closed in Alternative 2 of the FEIS. <br> Under Alternatives 2 and 3, OSV use was not designated in the majority of these Rx-8 prescriptions or IRAs (Bald Rock, Dixon Creek, Grizzly Ridge, Middle Fork, Thompson Peak) and OSV use is only allowed in portions of Beartrap, Chips Creek, Keddie Ridge, and Lakes Basin Semi-Primitive Areas ( $\mathrm{Rx}-8$ ) to protect the semi-primitive and non-motorized characteristics. Alternative 2 has been modified within the FEIS in the Chips Creek SemiPrimitive Area and IRA to exclude the Indian Springs area near the Lassen NF border and extend the non-motorized area of east of Yellow Creek to NFS Road 26N26. There are three areas near the Lassen National Forest border proposed in the FEIS as still open to OSV (near Ben Lomond Peak, Chambers Peak and Tobin Ridges) to allow for continuity in motorized opportunities in those open OSV areas from the Lassen National Forest. |


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| EIS Maps - Accuracy | In examining the maps in the DEIS we see that there are several small and isolated areas that are proposed to be designated for OSV use in each Alternative. As best we can tell, many of these isolated parcels are remnants from a GIS mapping exercise and would not make sense to designate because they are not connected to a larger OSV use area, there is no way for an OSV user to access them, and/or they don't really provide an OSV opportunity. In the final over-snow vehicle use map (OSVUM) the PNF should make sure that all designated OSV areas can be accessed by the public from an OSVcompatible access point. | Thank you for your comment. <br> Antelope and Frenchman open area boundaries follow Indian Creek where there are two locations that users can feasibly cross-Antelope Dam and Babcock Crossing. Davis and Frenchman open area boundaries follow a natural boundary as Red Clover Creek and Clover Valley is a large (7 miles) section of private land. The remainder of this boundary, about 5 miles, follows the Beckwourth-Genesee Plumas County road. There are limited crossings along this boundary as well-Knotson Bridge, Drum Bridge, a bridge at NFS road 25N05, and Plumas County road 177. At Janesville Grade specifically, there are no topographic features with the exception of Janesville Grade (NFS road 28N01 and Plumas County road 208). Topographic features were considered when identifying discrete open areas for this project. <br> Bucks Lake Open Area <br> 1. From Plumas County Road 414, designate and groom 24 N33 to the intersection of 24N89X; continue grooming 24N89X to the intersection of 24N89XA. This leads users away from the Bucks Lake Wilderness boundary, provides a longer groomed OSV trail and a safe turn around location for the grooming machine. These NFS roads and segments were added to appendix C of the FEIS and minimization criteria was evaluated for each. <br> A version of the NFS 24N33 road was considered in Alternative 4 with inaccurate data from Infra and outdated road location information. Knowledge of road location on the landscape informed us that 24 N33 was rerouted into 24N89X and that the 24N33A (spur) no longer exists. <br> 2. Remove proposed designated OSV open areas west of Bucks Lake. Prohibit OSV use west of NFS road 24N24, and 24N35 and 24N25Y (considered two unique areas adjacent to one another), north of 24 N 34 . These areas receive little to no OSV use due to steep terrain and risk of avalanches. |


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| EIS Maps - Accuracy (continued) |  | 3. Redraw proposed designated OSV open area in the Yellow Creek area of the Chips Creek Roadless area northwest of Bucks Lake Wilderness. Redraw open area to NFS road 26N26 and ridge above 26N26. Limiting the OSV open area to the ridge removes a steep slope that provides access to a creek. This is not a high use or value area for OSV use. <br> 4. Remove proposed designated OSV open area north of Indian Creek in the Chips Creek Roadless area. Removing this small open area protects the semiprimitive nature of the Chips Creek Roadless area. <br> 5. Remove proposed designated OSV open area in and around the Gold Lake ski trail, adjacent to the Gold Lake staging area, including Gray Eagle Creek (NFS lands west of Plumas County Road 519). The area removed extends from the southern edge of private land near Graeagle, Gray Eagle Creek, the Gold Lake ski trail, and NFS lands that reach the Graeagle Lodge. NFS lands east of Plumas County Road 519 are generally designated as open. This change separates motorized and non-motorized uses, such that OSVs are not crossing or using a non-motorized trail or Gray Eagle Creek. <br> Lakes Basin Open Area <br> 1. Redraw open area in Lakes Basin. Propose designation of open area from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and use ridge toward Graeagle Lodge as boundary change. This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. <br> 2. Propose designation of NFS lands in section 3 nearest to "A Tree" adjacent to the Tahoe and Plumas National Forests administrative boundary. <br> 3. Adding section 3 near A Tree allows for motorized use from the Tahoe onto the Plumas and provided connectivity from NFS road 23N08 onto Plumas County Road 507. These roads provide access to the larger La Porte open area, La Porte, and Onion Valley. <br> 4. Remove proposed designated open area in sections 29 and 32 near A Tree Campground in between McRae Ridge and NFS road 23N08, and immediately adjacent to the La Porte and Lakes Basin open area unit boundary. <br> 5. Remove proposed open area designation in section 33 to provide contiguous areas not designated for OSV use within sections 32,33 , and 34 as this has high value to non-motorized users. Designation of NFS Road 23N08 allows OSV access through the closed area from Lakes Basin to La Porte. <br> 6. Designate NFS road 23N08 as an ungroomed OSV trail to provide access across undesignated NFS lands between open areas, and to provide access to open areas from Sloat. Designation of NFS road 23N08 overlies Lakes Basin and La Porte open areas. |


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| EIS Maps - Accuracy (continued) |  | La Porte Open Area <br> Just north of Harrison Campground, redraw the open boundary to include NFS 23N10 extreme eastern portion of the road. Insignificant change for motorized uses, portion of SIA that would become open is extremely steep and densely vegetated and would not likely receive OSV use. <br> Davis Open Area <br> Designate NFS lands just south of Indian Valley, toward the east near Iron Dyke, along Plumas County Road 208. Designate NFS lands on the eastern edge of Greenville overlaying with NFS road 28N32. This addition provides connectivity from private land and NFS lands proposed for designation for cross-county OSV travel. <br> Antelope Open Area <br> Designate NFS lands along North Arm in Indian Valley south of Engel Mine to provide access from private land to designated NFS lands as open areas allowing cross-country travel. <br> Pacific Crest Trail Areas Not Designated for OSV Use <br> Seventy-nine miles of the Pacific Crest Trail cross the Plumas National Forest administrative boundary from the Lassen to the Tahoe National Forests. Almost 18 miles of the PCT overlie designated wilderness or special areas leaving just over 61 miles of PCT to evaluate the purpose and nature of the trail and use of over-snow vehicles. <br> An area not designated for OSV use is not applied when the PCT overlies and is adjacent to undesignated NFS lands or when NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT. Undesignated NFS lands do not authorize OSV use on or adjacent to the PCT and an area not designated for OSV use adjacent to the PCT is not necessary. NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT within the 500-foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. <br> An area not designated for OSV use is applied at Bucks Summit, a congested, high-use staging area; the eastern side of the Middle Fork Wild and Scenic River to provide a noise buffer; and from the general area of Onion Valley to McRae Ridge to include the preservation of historic ski trails. |


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| $\begin{array}{ll}\text { EIS Maps - Accuracy } \\ \text { (continued) }\end{array}$ |  | $\begin{array}{l}\text { Bucks Summit } \\ \text { 1. From Bucks Summit staging area off of Plumas County Road 414, heading } \\ \text { south along the PCT, increase areas not designated for OSV use in between } \\ \text { two designated and groomed OSV trails: NFS roads 24N29Y and Plumas }\end{array}$ |
| County Road 119 (Big Creek Road). On the west side of the PCT, the areas |  |  |
| not designated for OSV use starts along the ridge in between NFS road |  |  |
| 24N29Y and the PCT. On the east side of the PCT, the area not designated for |  |  |
| OSV use extends from the Bucks Summit trailhead to the Plumas County Road |  |  |
| 119. NFS lands adjacent to Plumas County Road 414 near Deadwood Creek |  |  |
| and adjacent to private lands were also included in the area not designated for |  |  |
| OSV use. |  |  |
| The Bucks Summit trailhead receives both non-motorized and motorized uses. |  |  |
| The area not designated for OSV use provides a noise barrier along the PCT in |  |  |
| a congested area. This segment of the PCT provides about 3 miles of gentle |  |  |
| terrain to the south of Bucks Summit. |  |  |$\}$


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| EIS Maps - Accuracy <br> (continued) |  | Southeast corner of section 1 to intersection with NFS road 22N56 <br> 1. Remove areas not designated for OSV use adjacent to PCT because NFS <br> roads (23N65Y, 23N65YB, and 22N56) parallel the PCT within the 500-foot <br> areas not designated for OSV use originally proposed in the proposed action. <br> The nature and purpose of the PCT is affected by these motorized routes in the <br> non-winter months. |
|  |  | Intersection with NFS road 22N56 to east side of private land in section 11 |
| (T22N, R8E) |  |  |


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| EIS Maps - Accuracy (continued) |  | 2. Maintain areas not designated for OSV use adjacent to the PCT at the intersection with NFS Road 22N82X, around the northeast side of Pilot Peak, and adjacent to the PCT along Bunker Hill Ridge, southeast to where the PCT is within the Semi-primitive Prescription (RX-8). A widened area not designated for OSV use along the PCT both meets the nature and purpose of the trail, and recognizes historic uses of the trail as the 'Lost Sierra Ski Traverse.' <br> NFS Road 22N46 to Tahoe National Forest (administrative boundary) <br> 1. Remove areas not designated for OSV use adjacent to PCT because the PCT parallels NFS 22N46 and then crisscrosses two national forest administrative boundaries numerous times. Generally, NFS lands are designated as open on both national forests; the Tahoe National Forest selected alternative does not include areas not designated for OSV use adjacent to the PCT. Given the PCT crisscrosses administrative boundaries, areas not designated for OSV use adjacent to the PCT in only the Plumas National Forest results in fragments of non-motorized areas that are impractical for implementation. <br> General Changes <br> 1. Generally, remove designated ungroomed OSV trails that overlap with open areas. All designated ungroomed OSV trails that cross private ownerships, restricted and prohibited areas, or connect open areas should remain for designation to illustrate the trail is needed to access an otherwise prohibited or restricted area. <br> 2. Our current action alternatives include county roads as proposed designated NFS OSV trails and in most cases grooming. Based on current jurisdiction in Infra, these roads are not aligned with Travel Management Rule, Subpart C regulations, such that the Forest Service should not designate county roads as NFS OSV trails. Remove county roads, with county jurisdiction, from all action alternatives, from proposed designation as NFS OSV trails. <br> Maintain county roads, with county jurisdiction, in all action alternatives that are proposed for grooming. These will be displayed on our alternative maps as "other groomed OSV trails" and will not be designated as NFS OSV trails. <br> 3. Change vehicle class definition from width to pounds per square inch. Vehicle class is now defined by the ground pressure exerted by different types of OSVs to better align with potential resource impacts (as heavier vehicles create deeper tracks and can potentially cause resource damage). The revised |


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| EIS Maps - Accuracy (continued) |  | Class 1 OSVs include those that typically exert a ground pressure of 1.5 pounds per square inch (psi) or less. This class includes snowmobiles, tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked utility terrain vehicles (UTVs), and snowcats. The revised Class 2 OSVs include those that typically exert a ground pressure of more than 1.5 psi . This class includes tracked fourwheel drive (4WD) sport utility vehicles (SUVs) and tracked 4WD trucks. Class 1 will be able to operate on areas and trails designated for OSV use while Class 2 will be restricted to designated OSV trails available for grooming." <br> 4. Miscellaneous parcels of NFS land that were inaccessible islands were deleted. |
| Allocation of Use - Bias | There are more OSVers than there are extreme backcountry skiers, which is documented by DMV snowmobile registration numbers. The Forest Service mission is to manage the land for the greatest good for the greatest number of people. The DEIS is in violation of that mission. Further, when you look at designated riding areas in California, snowmobilers are clearly limited compared to other snow users. | The Multiple-Use Sustained-Yield Act of 1960 authorizes and directs the national forests to be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes. Under the multiple-use principle, the Forest Service manages winter uses to conserve and sustain National Forest System (NFS) resources and provide a range of opportunities for motorized and non-motorized recreation. National forests are managed to provide access for both motorized and non-motorized uses in a manner that is environmentally sustainable over the long term. NFS lands are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the NFS lands to provide different opportunities for recreation. The criteria for designating roads, trails, and areas for OSV use in the Final Travel Management Rule, 36 CFR 212 Subpart C (effective January 28, 2015) require the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts (36 CFR 212.55(b) and 212.81(d)). <br> Though some commenters believe that motorized and non-motorized forms of over-snow recreation are compatible, other commenters strongly believe that the two forms of winter recreation are conflicting and incompatible. Based on scoping and DEIS comments, alternatives in the DEIS and FEIS were designed and modified to provide a range of over-snow recreation motorized access needs/opportunities, non-motorized needs/opportunities and other natural resource protections per NEPA requirements per FSH 1909.15. |


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| General Support | We sincerely appreciate the significant work <br> that the Forest Service has put into the <br> analysis in this DEIS. Overall, we believe the <br> analysis provides a relatively thorough <br> discussion of some of the impacts <br> associated with OSV use. In particular, we <br> are pleased to see the Forest Service <br> consider OSV impacts to roadless <br> characteristics (see, e.g., DEIS at 84-86) and <br> wilderness attributes (DEIS at 85) under <br> each alternative; analyze a wide range of <br> alternatives to allow for meaningful | No further response required. General comments in support of the process and <br> improvements made. <br> comparison; consider classification and <br> designation of OSV areas and trails by OSV <br> class; and provide a clear description of the |
|  | minimization criteria. We applaud the Forest <br> Service for considering alternatives (3 and 5) <br> that avoid designating OSV use below 5,000 <br> feet in elevation due to limited snow cover. <br> Given the numerous serious deficiencies in <br> the Forest's original proposed action, as <br> described in our scoping comments, the <br> modified proposed action represents |  |
|  | significant progress in applying the <br> requirements of subpart C of the Travel <br> Management Rule. |  |
| Biological Evaluation | We request that the Forest Service make the <br> full Biological Evaluation accessible on its <br> website to provide the public more than a <br> mere summary of its findings and enable <br> sufficient review of the agency's findings. | Thank you for your comment. <br> Draft reports are available upon request because they are subject to change. <br> Final reports will be published to the project specific website once the Notice of <br> Availability of the FEIS and draft Record of Decision are released for the <br> objection filing period. The objection filing period will be noticed in the <br> newspaper of record, Feather River Bulletin, and is expected in August 2019. |


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| Settlement Agreement | The Organizations are also submitting these comments under the assumption that any decision from the various California NF (Stanislaus, Lassen, LTBMU, Tahoe and others) that are moving forward with winter travel management as required under previous settlement agreements addressing winter grooming will again be sued by Winter Wildlands and others regardless of the decisions that are provided for winter travel. This position is based on the recently filed legal challenge to the issuance of OSVUM on the Payette, Bridger-Teton and Payette NF in Idaho by WWA, where the OSVUM were based on existing planning on these forest for OSV usage. 59 Despite these maps based on existing planning being specifically allowed in the settlement of previous litigation, they were immediately challenged by WWA and others. | No further action required. Conjectural in nature. |
| Range of Alternatives Marten/Wildlife | Despite heavily relying on monitoring to track, assess, mitigate, and minimize OSV impacts to wildlife and other resources, the Forest Service fails to provide adequate detail about its monitoring protocol (e.g., how often monitoring will occur and where), analyze the effectiveness of its monitoring and other mitigation measures, and ensure that they are enforceable. Consider a reasonable range of alternatives to adequately compare impacts. NEPA requires agencies to "[r]igorously explore and objectively evaluate all reasonable alternatives" to a proposed action - an analysis that is considered the "heart" of an EIS. 40 C.F.R. § 1502.14. | 1) The FEIS provides regulation and direction related to monitoring (volume I page 35 , volume III page 229), describes effectiveness and compliance monitoring details across resource areas (volume I pages $35-37$, volume III pages 229-231), and outlines enforcement and education methods and how monitoring efforts will provide information on use levels and patterns of use (volume I pages 38-39, volume III pages 232). The Forest Service provided detailed description of monitoring and enforcement methods and their application within the regulatory framework. <br> 2) The FEIS provides regulation and direction related to marten management, identifies issues, measures, and indicators of potential impacts to the species and its habitat, specifically evaluating habitat connectivity (volume I pages $17,52,163,212,216$; volume II pages $57,59-61$ ). The FEIS presented variation in the amount and connectivity of marten habitat proposed for OSV use across alternatives with acres of marten habitat available for OSV use varying between $65-89 \%$ across alternatives (11-35\% of marten habitat not open for OSV use, volume I page 182). The FEIS also presented variation across |


| Concern Category | Concern Statement | Concern Response |
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| Range of Alternatives Marten/Wildlife (continued) | Certain elements of the range of alternatives are inadequate. For instance, there is almost no range of alternatives in terms of Pacific marten habitat open to cross-country OSV use, or for loss of connectivity habitat. See DEIS at 175, Table 38. The Forest Service should consider an alternative that would not designate OSV use in marten and other important wildlife habitat, including CSO PACs. <br> 1) The Forest Service fails to provide adequate detail about its monitoring protocol (e.g., how often monitoring will occur and where), analyze the effectiveness of its monitoring and other mitigation measures, and ensure that they are enforceable. <br> 2) There is almost no range of alternatives in terms of Pacific marten habitat open to cross-country OSV use, or for loss of connectivity habitat. See DEIS at 175, Table 38. The Forest Service should consider an alternative that would not designate OSV use in marten and other important wildlife habitat, including CSO PACs. | alternatives in terms of acres of marten habitat open to OSV use and conducive to OSV which varied between 68-87\% (13-32\% of marten habitat conducive to OSV use not open, volume I page 182). For all terrestrial (volume I page 162) and aquatic (volume I page 224) wildlife and their habitat, including California spotted owls and their protected activity centers, the FEIS presents the project's regulatory framework (volume I pages 210-217, volume II pages 23-62), issues, indicators, measures (volume I pages 14-20,163-164,221), and analytical methods (volume I pages 165-169,219-223) while evaluating direct, indirect and cumulative environmental consequences for each species and alternative (volume I pages 169-209,224-261). The range of alternatives proposed by the Forest Service varied in the amount of marten habitat designated for OSV use. Although the Forest Service did not propose an alternative prohibiting OSV use in marten habitat, the range of alternatives proposed by the Forest Service varied in the amount of marten habitat designated for OSV use. |
| User Conflict - Separation of Use Areas | We would be opposed to the large-scale designation of separate play areas for each usage, as we vigorously believes that all usages should be encouraged to play together in the backcountry as winter recreation is heavily dependent on the groomed winter route network provided by the snowmobile registration dollars for access to any portion of the PNF. | There are no large-scale areas designated for either motorized or nonmotorized uses in any of the action alternatives. The criteria for designation of roads, trails, and areas for OSV use in the Final Travel Management Rule, Subpart C (effective January 27, 2015) specifically requires the responsible official to consider effects of OSV use on natural resources and conflicts between OSV use and existing or proposed recreational uses of NFS lands (including non-motorized winter recreational uses) with the objective of minimizing those impacts and conflicts (36 CFR 212.55(b) and 212.81(d)). |


| Concern Category | Concern Statement | Concern Response |
| :---: | :---: | :---: |
| User Conflict - Separation of Use Areas (continued) | If there are areas where usages that are inconsistent in terms of desired experiences, the Organizations do support separate parking areas for these usages in order to reduce conflicts as most conflict of winter users occurs at trailheads as access points are often limited In the winter. The Organizations are also aware that separate parking areas often is not possible due to the fact that groomed routes are the primary method of accessing the backcountry and those winter groomed routes are provided predominately by the California OHV winter grooming program paid for with snowmobile registration funds. This is an issue where a balance simply must be struck due to funding limitations for grooming activities. | Though some commenters believe that motorized and non-motorized forms of over-snow recreation are compatible, other commenters strongly believe that the two forms of winter recreation are conflicting and incompatible. Conflicts can be present without direct physical encounters, and may be occurring without the knowledge of the party causing the conflict. Not everyone sees conflicts in the same way. Non-motorized recreationists can choose to use the OSV designated areas if they are not concerned about conflicts. Minimization criteria and issues other than or in addition to user conflicts were factors considered when determining which areas to designate or not designate for OSV use in each alternative. Alternative 2 of the FEIS strikes a balance between providing for both motorized and non-motorized opportunities. The commenter is correct that non-motorized recreation relies on access to staging areas that are often plowed by Counties with funding from California State Park OHVMR Division. However, once non-motorized users get to a staging area, there are many different types of opportunities for non-motorized recreation, most of which do not rely upon on a groomed network. Some nonmotorized uses such as skate skiing do require groomed trails, and in the absence of non-motorized groomed trails, skate skiers will use groomed OSV trails. <br> Providing separate staging areas for motorized uses and non-motorized uses is outside the scope of this project, and is not possible due to funding limitations. |
| Access - Local Community | This proposal does not consider the needs of the greater community of users nor the communities that rely on winter recreation dollars. Further, the proposed restrictions have not addressed access for the people that have cabins and live and work in this area year round. Several people live here year round and need access in out on a daily basis. | 36 CFR 212.55 (d)(1) states that In making designations pursuant this subpart, the responsible official shall recognize: (1) Valid existing rights, and 36 CFR 212.81(a) describes the following as exempted from OSV-use designations, " Over-snow vehicle use that is specifically authorized under a written authorization issued under Federal law or regulations " (36 CFR 212.81(a) (5)). The Forest Service has no intention of eliminating access to private land or property. The Forest Service recognizes land and structure owners as well as those who possess a recreation residence special use permit have valid existing rights to access their land, structure, or recreation residence via an OSV. OSV-use however should be limited to that required to access their land or structure. OSV-use for recreational purposes occurring outside of those designated and published on the OSVUM, would still be prohibited. Compliance with these rules will be the user's responsibility. |
| Collaboration | Comments requesting continued community collaboration. | No further action required. Comments are general in nature and speak to continued collaboration with the OSV community prior to making any additional decisions. |


| Concern Category | Concern Statement | Concern Response |
| :---: | :---: | :---: |
| Public Involvement - Bias | Commenters contend that the Forest service failed to engage equally with all interested organized groups and individuals regarding public input. The commenters further contend that input from the motorized community was neither solicited or desired, and has therefore resulted in biased public input and agency decision-making. | Thank you for your comment <br> The responsible official shall consider all written comments submitted (36 CFR 212.25(b)) until a decision is signed. All agencies of the Federal Government shall comply with these [Protection of Environment] regulations (40 CFR 1507.1). It is the intent of these regulations to allow each agency flexibility in adapting its implementing procedures authorized in 1507.3 to the requirements of other applicable laws. Further, Agency procedures may provide that where there is a lengthy period between the agency's decision to prepare an environmental impact statement and the time of actual preparation, the notice of intent required by 1501.7 may be published at a reasonable time in advance of preparation of the draft statement (40 CFR 1507.3). <br> A scoping letter describing the proposed action and seeking public comments was sent via regular mail or email to approximately 278 interested groups, individuals and agencies on September 28, 2015, with comments requested to be returned by October 29, 2015. A notice of intent to prepare an environmental impact statement was published in the Federal Register on September 29, 2015. Two additional notices were sent, extending the scoping comment deadline, and making minor corrections to the scoping notice, with the final comment period deadline of November 30, 2015. Several press releases were sent to local news media outlets announcing the opportunity to comment, and extensions of the comment period. In addition, five public scoping meetings were held in local affected communities. All letters, notices, and press releases included a web address for the project's website where comments could also be submitted. <br> During October and November 2015, alternative 6, the first iteration of the proposed action was presented in a series of public meetings in communities surrounding the Plumas including Quincy, Portola/Graeagle, Oroville, and Sierra City). The meetings were held to inform members of the public about the Plumas National Forest Over-snow Vehicle Use Designation Project and for the Forest to hear from the public about their interests and concerns regarding OSV use. This information was used to help refine the initial proposed action (alternative 6). Information gathered included: <br> - Areas and trails identified as desirable by OSV enthusiasts; <br> -Areas and trails identified as desirable by quiet, non-motorized recreation enthusiasts; <br> -Concerns related to impacts to non-motorized recreation; <br> -Concerns related to OSV access and connectivity; and <br> -Concerns related to forest resources (e.g., wildlife, soil, water, vegetation) |

Plumas National Forest

| Concern Category | Concern Statement | Concern Response |
| :---: | :---: | :---: |
| Public Involvement - Bias (continued) |  | Based on the concerns expressed during the public meetings, the proposed action was further refined prior to scoping. The proposed action advertised (scoped) in September 2015, was a compilation of the Forest Service's efforts, as well as, public input. <br> We received and considered responses from 190 interested groups, individuals, and agencies in the form of letters, emails, and website submissions (appendix H). We appreciate the time and perspectives shared by each commenter, and the willingness of all to engage in the environmental analysis process. <br> Forest staff met with the Plumas County Coordinating Council OSV subcommittee on 14 occasions between March 5, 2015, and June 9, 2016, to brief them on the purpose and need and the overall analysis process. The subcommittee met with the local recreation groups on three occasions in 2016 (May 13, May 20, and May 26) to understand the various positions and bring together any common recommendations related to the proposed action or alternatives. These meetings ended with agreement regarding the definition of OSV crossings for the Pacific Crest National Scenic Trail (PCT): "adequate crossings along the PCT wide enough for changing conditions for motorized uses, as long as motorized access is designated on each side of PCT, while maintaining historic routes." <br> Letters dated November 10, 2015, were received from the plaintiffs and intervenors from the Snowlands lawsuit, describing their preferred alternatives. Follow-up letters were sent to both the plaintiffs and intervenors on May 31, 2016, requesting clarification of the alternative components that had been submitted and informing them of the components of their requests that were believed to be outside of the scope of this project. The plaintiffs and intervenors sent letters of response to the Forest Service dated June 28, 2016, and June 20,2016 , respectively. <br> We met with representatives of the plaintiffs (April 27, 2016) and local recreation groups (Friends of Plumas Wilderness, May 13, 2016, and Sierra Access Coalition, May 19, 2016) to clarify their alternative submissions and discuss overall project status (FEIS, volume I Chapter 1, Public Involvement, pages 9-12). <br> Further refinements to the proposed action (modified) were implemented after scoping and presented to the public in the DEIS. For more details regarding the modifications to the proposed action refer to the FEIS, Chapter 2, Refinement of the Action Alternatives, pages 24-27) |


| Concern Category | Concern Statement | Concern Response |
| :---: | :---: | :---: |
| Public Involvement - Bias (continued) |  | Two open houses were rescheduled after the government shutdown and held February 26, 2019, in Blairsden-Graeagle, CA, at the Graeagle Fire Hall, 7620 Hwy 89, from 4:00-6:00 pm; and February 27, 2019, in Oroville, CA, at the Southside Oroville Community Center, 2959 Lower Wyandotte Rd. from 4:006:00 pm. This information was sent to Forest key and media contacts and listed on the project and Forest specific websites. This information was last updated on February 11, 2019, once the location of one open house was [CKA-1] determined. |
| Public Involvement Extension Requested | The commenters are requesting an extension to the public comment period due to the Camp Fire and the government shutdown. As a result, Plumas forest personnel (including the project point of contact) were unable to respond to emails and telephone calls seeking additional information. The shutdown also caused the cancellation of two scheduled public meetings, where the Forest was planning to present information and receive public comments. Given these factors, the Forest should extend the comment period accordingly. | The requested extensions were granted. The Plumas National Forest extended the comment period on two separate occasions. The first occasion was in response to the impacts of the Camp Fire. An extension of 45 days was granted. The second occasion was due to the government shutdown. The extension was granted for 37 days. When combined, the total comment period on the DEIS equaled 127 days. |
| Public Involvement Inadequacies | Commenters contend that the Forest Service did not complete adequate scoping. Comments identify multiple concerns including: the length of time between the initial scoping (2015) and release of the DEIS, the use of potentially our dated public input, the inability to make inquiries and receive additional information throughout the process, timing of public meetings, and intentionally misleading the public. | Thank you for your comment <br> The responsible official shall consider all written comments submitted (36 CFR 212.25(b)) until a decision is signed. All agencies of the Federal Government shall comply with these [Protection of Environment] regulations (40 CFR 1507.1). It is the intent of these regulations to allow each agency flexibility in adapting its implementing procedures authorized in 1507.3 to the requirements of other applicable laws. Further, Agency procedures may provide that where there is a lengthy period between the agency's decision to prepare an environmental impact statement and the time of actual preparation, the notice of intent required by 1501.7 may be published at a reasonable time in advance of preparation of the draft statement (40 CFR 1507.3). |


| Concern Category | Concern Statement | Concern Response |
| :---: | :---: | :---: |
| Public Involvement Inadequacies (continued) |  | A scoping letter describing the proposed action and seeking public comments was sent via regular mail or email to approximately 278 interested groups, individuals and agencies on September 28, 2015, with comments requested to be returned by October 29, 2015. A notice of intent to prepare an environmental impact statement was published in the Federal Register on September 29, 2015. Two additional notices were sent, extending the scoping comment deadline, and making minor corrections to the scoping notice, with the final comment period deadline of November 30, 2015. Several press releases were sent to local news media outlets announcing the opportunity to comment, and extensions of the comment period. In addition, five public scoping meetings were held in local affected communities. All letters, notices, and press releases included a web address for the project's website where comments could also be submitted. <br> During October and November 2015, alternative 6, the first iteration of the proposed action was presented in a series of public meetings in communities surrounding the Plumas including Quincy, Portola/Graeagle, Oroville, and Sierra City). The meetings were held to inform members of the public about the Plumas National Forest Over-snow Vehicle Use Designation Project and for the Forest to hear from the public about their interests and concerns regarding OSV use. This information was used to help refine the initial proposed action (alternative 6). Information gathered included: <br> -Areas and trails identified as desirable by OSV enthusiasts; <br> -Areas and trails identified as desirable by quiet, non-motorized recreation enthusiasts; <br> -Concerns related to impacts to non-motorized recreation; <br> -Concerns related to OSV access and connectivity; and <br> -Concerns related to forest resources (e.g., wildlife, soil, water, vegetation) Based on the concerns expressed during the public meetings, the proposed action was further refined prior to scoping. The proposed action advertised (scoped) in September 2015, was a compilation of the Forest Service's efforts, as well as, public input. <br> We received and considered responses from 190 interested groups, individuals, and agencies in the form of letters, emails, and website submissions (appendix H). We appreciate the time and perspectives shared by each commenter, and the willingness of all to engage in the environmental analysis process. |


| Concern Category | Concern Statement | Concern Response |
| :---: | :---: | :---: |
| Public Involvement Inadequacies (continued) |  | Forest staff met with the Plumas County Coordinating Council OSV subcommittee on 14 occasions between March 5, 2015, and June 9, 2016, to brief them on the purpose and need and the overall analysis process. The subcommittee met with the local recreation groups on three occasions in 2016 (May 13, May 20, and May 26) to understand the various positions and bring together any common recommendations related to the proposed action or alternatives. These meetings ended with agreement regarding the definition of OSV crossings for the Pacific Crest National Scenic Trail (PCT): "adequate crossings along the PCT wide enough for changing conditions for motorized uses, as long as motorized access is designated on each side of PCT, while maintaining historic routes." <br> Letters dated November 10, 2015, were received from the plaintiffs and intervenors from the Snowlands lawsuit, describing their preferred alternatives. Follow-up letters were sent to both the plaintiffs and intervenors on May 31, 2016, requesting clarification of the alternative components that had been submitted and informing them of the components of their requests that were believed to be outside of the scope of this project. The plaintiffs and intervenors sent letters of response to the Forest Service dated June 28, 2016, and June 20, 2016, respectively. <br> We met with representatives of the plaintiffs (April 27, 2016) and local recreation groups (Friends of Plumas Wilderness, May 13, 2016, and Sierra Access Coalition, May 19, 2016) to clarify their alternative submissions and discuss overall project status (FEIS, Chapter 1, Public Involvement, pages 9-12). <br> Further refinements to the proposed action (modified) were implemented after scoping and presented to the public in the DEIS. For more details regarding the modifications to the proposed action refer to the FEIS, Chapter 2, Refinement of the Action Alternatives, pages 26-29) <br> Two open houses were rescheduled after the government shutdown and held February 26, 2019, in Blairsden-Graeagle, CA, at the Graeagle Fire Hall, 7620 Hwy 89, from 4:00-6:00 pm; and February 27, 2019, in Oroville, CA, at the Southside Oroville Community Center, 2959 Lower Wyandotte Rd. from 4:006:00 pm. This information was sent to Forest key and media contacts and listed on the project and Forest specific websites. This information was last updated on February 11, 2019, once the location of one open house was [CKA-1] determined. |


| Concern Category | Concern Statement | Concern Response |
| :--- | :--- | :--- |
| Forest Service Leadership | The fifth issue concerns the poor leadership <br> by former Forest Supervisor Daniel Lovato, <br> which includes arbitrary decision-making and <br> lack of planning acumen. Supervisor Lovato, <br> besides dealing poorly with the motorized <br> public and displaying an ideological <br> preference for non-motorized forms of <br> recreation during his tenure at the Plumas <br> National Forest, refused to listen when <br> confronted with facts regarding forest <br> planning. Supervisor Lovato created some of <br> the serious issues inherent in the DEIS <br> including serious violations of the 1988 <br> LRMP. | No further response required. Unrelated to decision being made. Position <br> statement. |
| DEIS - Stanislaus OSV | The DEIS fails to document any issues <br> and/or a purpose and need for the drastic <br> reduction in historical OSV use in the <br> Stanislaus Forest. | No further action required. Comments are in reference to the Stanislaus or <br> have been incorporated elsewhere. |

## Appendix J. Monitoring

Part 212, Subpart B, Section 212.57 of the Travel Management Rule (Federal Register volume 70, number 216, November 9, 2005) requires that each administrative unit of the NFS monitor the effects of motor vehicle use (including OSV use) on designated roads and trails and in designated areas under the jurisdiction of that Responsible Official, consistent with that unit's Land Management Plan, as appropriate and feasible. This monitoring requirement applies to any areas or trails designated for OSV use in any decisions made as a result of this project, pursuant to 36 CFR § 212.81(d) of the final Use By Over-Snow Vehicles (Travel Management Rule, Federal Register volume 80, number 18, January 18, 2015).

To achieve compliance with Section 212.57, the Plumas OSV interdisciplinary team developed monitoring procedures to determine the effects of OSV use within the areas designated as open to OSV use and on the designated OSV snow trails. The monitoring procedures were designed to be able to: (1) measure the effectiveness of the designations in avoiding or minimizing resource damage; (2) measure public compliance within the OSV area and snow trail designations; (3) document enforcement of the OSV area and snow trail designations; and (4) measure use levels and patterns of use and identify concentrated use areas.

## Effectiveness Monitoring

1.1 During routine winter recreation field visits, recreation personnel and forest protection officers monitor staging areas, trailheads, groomed trails, and other areas of concentrated use for public safety concerns. Site-specific controls such as speed limits; segregated access points for motorized and nonmotorized uses; increase visitor information; or increased on-site patrol personnel are implemented as needed annually.
1.2 During routine winter recreation field visits, recreation personnel and forest protection officers monitor OSV use and document any signs of damage occurring to forest resources. Observations of the impacts identified below would constitute resource damage, but is not limited to the following:

## Soil and Water

- Evidence of visible rutting, churning, erosion (loss of soil cover or forest floor layers missing, loss of topsoil, evidence of rilling), compaction, or a combination of these disturbances.
- Road and trail surfaces are bare of snow and the surface is disturbed by OSVs
- As a result of ground disturbance, there is visible turbid runoff
- Broken and trampled vegetation especially near streams
- Visible oil or unburned fuel deposits observed
- OSVs are operating in or across open water


## Aquatic Resources

- OSVs are operating in or across open water
- Direct vehicle collisions with aquatic species that cause injury or mortality
- Stream crossings damaging banks or displacing streambed features (for example, rocks, logs, debris)
- Evidence of soil, water, and vegetation impacts (as outlined under "Soil and Water" impacts, above), particularly in riparian areas or near water.
- Snow compaction impacts to overwintering sites (when spaces can be observed under the snow that were made visible by OSV tracks or notice dead animals under the snow).
- Noticing cross-country use with less than 12 inches of snow depth or trails that show patches of dirt along with the snow.
- Noticing gasoline or oil spills especially in areas where runoff might drain the spillage into waterways.


## Terrestrial Wildlife

Observations of direct impacts to species:

- Direct vehicle collisions with wildlife species that cause injury or mortality
- Snow compaction impacts to den sites or prey habitat (when spaces can be observed under the snow that were made visible by OSV tracks or notice dead animals under the snow). The minimum 12inch, cross-country snow depth should mitigate this effect.
- Temporary or permanent displacement of species during OSV use (observance that a species that regularly use an area are not present during OSV use)
- Displacement of populations or individual animals from a route, related to human activities (observance of deer fleeing from OSVs or people actively chasing species with their OSVs).
- Compaction and crushing of host or edible plant species.
- Noticing cross-country use with less than 12 inches of snow depth or trails that show patches of dirt along with the snow.
- Noticing gasoline or oil spills especially in areas where runoff might drain the spillage into waterways.


## Botany

- TES tree or shrub species are directly damaged by contact with OSVs (skis, tracks, paddle tips, or even front end could damage individuals) - could be minimal, and unintentional, or otherwise.
- Ground vegetation, soil, or both is disturbed, due to OSV over thin snow cover in areas where TES plants occur (none are currently identified).
- Woody plants (trees or shrubs) are broken and scarred, or ground vegetation and soil is disturbed,
- Stream crossings damage banks or displace streambed features (rocks, logs, debris).
- Spilled oil or fuel within TES plant occurrences.
- The intentional or negligent dissemination of invasive plant species.


## Compliance Monitoring

2.1 During routine winter recreation field visits, recreation and Forest Protection Officers monitor wilderness boundaries and other designated non-motorized recreation areas near or adjacent to designated OSV areas or designated OSV snow trails to document any signs of incursions occurring
(e.g., tracks, or observed use outside of designated area or trail). Coordination, user educational materials, or enforcement actions will be increased as needed.
2.2 Locations on the Forest where OSV use is restricted to designated OSV snow trails (cross-country OSV use is prohibited), will be monitored to ensure public OSV use is restricted to the footprint of the designated trail and OSV use does not encroach into areas adjacent to the trail that may not have been designated for OSV use.
2.3 Locations on the Forest where cross-country OSV use has been designated (i.e., within OSV use areas) will be monitored to ensure public OSV use remains within the designated area.
2.4 Non-motorized trails including the Pacific Crest Trail, Buck's Creek Loop Trail, Grey Eagle Creek Trail, and Lakes Basin Ski Trails will be monitored to ensure that public OSV use is not occurring in these areas not designated for OSV use.
2.5 Snow depth will be monitored to ensure the minimum snow depth requirements are being met. Recreation staff will continue to monitor minimum snow depth at trailheads, staging areas, and parking areas to authorize trail grooming activities to commence. Snow depth stakes and OSV regulations will be added to plowed trailhead areas that access designated OSV trails and areas as an indicator and education tool for OSV users. Snow depth measurements will be located in areas that are relatively uniform and undisturbed, and will consist of a series of measurements located on the landscape in areas located away from tree wells, fence lines, wind-blown mounds, etc. Periodic monitoring of snow depths in more remote use area locations will help determine if access point snow depth measurements correlate with conditions on the landscape.
2.6 Staff conducting the monitoring will assess: (1) if the minimum snow depth requirements are being met; (2) if resource damage is occurring (below, at, or above the minimum snow depth requirements); (3) the extent of any observed damage; (4) what, if anything, can be done to address use occurring on snow depths below the minimum snow depth requirements; and (5) snow depth monitoring will consider best management practices (BMPs) and will evaluate whether OSV use is impacting the roads, routes, or soils that underlie trail surfaces and OSV use areas.

## Enforcement

3.1 The Forest will enforce the OSV use designations using a variety of approaches: 1) education; 2) warnings; 3) citations. These approaches will be used, if during routine winter recreation field visits, recreation and FPO staff observe 1) OSV use is occurring on NFS lands outside of the designated OSV use area or trails; 2) OSV use is occurring when sow depths are below the designated minimum snow depth requirement; 3) OSV use is observed to be causing resource damage.
3.2 Enforcement through education has proved to be a successful way in which to engage the public recreating on NFS lands. This approach sets the framework to allow OSV use to occur while ensuring the land is managed in a way as " $[t]$ o sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations. "Providing on site communication with users demonstrate directly to the public where OSV use is designated to occur, why they are not in compliance with these designations, and share information that will enable the user(s) to ensure compliance and resource protection in the future.
3.3 Written warning accomplishes two main objectives: 1 ) documenting the encounter between recreation or FPO staff and an OSV user; and 2) provides the OSV user with a written, physical reminder of the encounter included a description of how they were in violation and how to conduct their OSV use in the future to remain in compliance with the Forest's OSV use designations and resource values.
3.4 Citations will be written on an individual, situational basis. Education and warnings are typically utilized first and for a short duration after the publication of the OSVUM. Citations (36 CFR 261.14) can be written for any OSV use not in accordance with the OSV use designations established pursuant to 36 CFR 212.81 on an administrative unit or ranger district of the NFS and identifications of OSV use designations on the OSVUM. Citations (36 CFR 261.9(a); 36 CFR 261.9(c)) can also be written for any OSV use that is observed to be causing (a) damage to any natural feature or other property of the United States; or (c) damage to any plant species that is classified as threatened, endangered, sensitive, or rare.
3.5 Citations written for violations of 36 CFR 261.14 including OSV use occurring on National Forest System lands outside of the designated OSV use areas or designated OSV use trails will be monitored annually.
3.6 Formal public complaints, reports of resource damage caused by OSV use, warnings, and citations are entered into the Law Enforcement and Investigations Management Attainment Reporting System (LEIMARS), a computerized database to collect information on crimes and violations that occur on National Forest System lands. LEIMARS was designed to provide agency managers with a means to identify and monitor law enforcement activities and provide a method to record and analyze information (Forest Service manual 5300).

## Use Levels and Patterns of Use

4.1 . A system for tracking observed use levels and patterns of use (for example, concentrated use areas) was developed by modifying an existing OSV program patrol log. Recreation personnel and forest protection officers who routinely conduct winter recreation field visits, will use the modified form and document levels and patterns of use, and effectiveness and compliance monitoring as described above. Observations would be documented on the form and could be made from parking or staging areas, or trailheads; while riding a snowmobile; or while cross-country skiing or snowshoeing. This information will be provided to the Forest's Public Services Staff Officer and Environmental Coordinator and stored at the Supervisor's Office in Quincy, California.

## Appendix K. Travel Management Definitions

Route categories and travel planning definitions applicable to this project (Table K-1) are based on the definitions in 36 CFR 212 - Travel Management.

Table K-1. Road and trail definitions

| Term | Definition |
| :---: | :---: |
| Administrative Use | Motorized vehicle use associated with management activities or projects on National Forest System land administered by the Forest Service or under authorization of the Forest Service. Management activities include but are not limited to: law enforcement, timber harvest, reforestation, cultural treatments, prescribed fire, watershed restoration, wildlife and fish habitat improvement, private land access, allotment management activities, and mineral exploration and development that occur on National Forest System land administered by the Forest Service or under authorization of the Forest Service. |
| Area | A discrete, specifically delineated space that is smaller, and, except for over-snow vehicle use, in most cases much smaller, than a Ranger District. |
| Cross-country Oversnow Vehicle Use | Public over-snow vehicle use that occurs off of trails designated for over-snow vehicle use, but within areas designated for public over-snow vehicle use. |
| Designated Road or Trail or Area | A National Forest System road, National Forest System trail, or an area on National Forest System lands that is designated for over-snow vehicle use pursuant to 36 CFR 212.51 on an over-snow vehicle use map (36 CFR 212.1). ${ }^{2}$ |
| Designation of oversnow vehicle use | Designation of a National Forest System road, a National Forest System trail, or an area on National Forest System lands where over-snow vehicle use is allowed pursuant to CFR 212.81. |
| Foreground | Seen areas and distance zones are determine the relative sensitivity of scenes based on their distance from an observer. These zones are identified as Foreground (up to $1 / 2$ mile from the viewer), Middleground (up to 4 miles from the foreground), and Background ( 4 miles from the viewer to the horizon). |
| Forest road or trail | A road or trail wholly or partially within or adjacent to and serving the [National Forest System (NFS)] that is determined to be necessary for the protection, administration, and utilization of the NFS and the use and development of its resources (36 CFR 212.1) |
| Non-motorized use | A term used in this document to refer to travel other than that defined as motorized. For example, hiking, riding horses, or mountain biking. |
| Over-snow vehicle (OSV) | A motor vehicle that is designed for use over snow and that runs on a track or tracks and/or a ski or skis, while in use over snow (36 CFR 212.1). Class 1 OSVs include those that typically exert a ground pressure of 1.5 pounds per square inch (psi) or less. This class includes snowmobiles, tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked utility terrain vehicles (UTVs), and snow-cats. The Class 2 OSVs include those that typically exert a ground pressure of more than 1.5 psi . This class includes tracked four-wheel drive (4WD) sport utility vehicles (SUVs) and tracked 4WD trucks. |
| Over-snow vehicle use map | A map reflecting roads, trails, and areas designated for over-snow vehicle use on an administrative unit or a Ranger District of the National Forest System. |
| Trail | A route 50 inches wide or less or a route over 50 inches wide that is identified and managed as a trail (36 CFR 212.1). |

[^2]| Term | Definition |
| :--- | :--- |
| Wheeled Over-Snow <br> (WOS) routes | Designated WOS Routes: include surfaced roads and other routes which are open for <br> WOS use by ATVs. |

## Appendix L. Acronyms

This appendix provides a list of acronyms used throughout the environmental impact statement, volumes 1,2 , and 3 .

| BAT | Best available technology | OSVUM | Over-Snow Vehicle Use Map |
| :---: | :---: | :---: | :---: |
| BMP | Best management practice | PCT | Pacific Crest National Scenic Trail |
| CAA | Clean Air Act | RCA | Riparian conservati |
| CAAQS | California Ambient Air Quality Standards | RNA | Research natural area |
| CARB | California Air Resources Board | RCO | Riparian conservation objectives |
| CVC | California Vehicle Code | RFA |  |
| CWA | Clean Water Act | A | Record of |
| DEIS | Draft Environmental Impact Statement | ROD ROS | Recreation Opportunity Spectrum |
| DEM | Digital Elevation Model | SDWA | Safe Drinking Water Act |
| GIS | Geographic Information System |  | State Historic Preservation |
| IRA | Inventoried roadless area |  | Officer (California) |
| LRMP | Land and resource management plan (forest plan) |  |  |
| MVUM | Motor vehicle use map |  |  |
| NAAQS | National Ambient Air Quality Standards |  |  |
| NEPA | National Environmental Policy Act |  |  |
| NFMA | National Forest Management Act |  |  |
| NFS | National Forest System |  |  |
| NHPA | National Historic Preservation Act |  |  |
| NRHP | National Register of Historic Places |  |  |
| NVUM | National Visitor Use Monitoring |  |  |
| OHMVR | Off-Highway Motor Vehicle Recreation Division |  |  |
| OHV | Off-highway Vehicle |  |  |
| OSV | Over-snow Vehicle |  |  |

## Appendix M. Changes to Alternative 2 between DEIS and FEIS

| Prohibit, Restrict, or Designate | Changes |
| :---: | :---: |
| BUCKS LAKE OPEN AREA |  |
| Designate and groom <br> Change to NFS road numbers and mileage | From Plumas County Road 414, designate and groom 24N33 to the intersection of 24 N 89 X ; continue grooming 24 N 89 X to the intersection of 24N89XA. This leads users away from the Bucks Lake Wilderness boundary, provides a longer groomed OSV trail and a safe turn around location for the grooming machine. <br> Requires application of minimization criteria. <br> A version of road was considered in Alternative 4 with inaccurate data from Infra and outdated road location information. Knowledge of road location on the landscape informed us that 24N33 was rerouted into 24N89X and that the 24N33A (spur) no longer exists. |
| Prohibit <br> Reduction in open areas | Remove proposed designated OSV open areas west of Bucks Lake. Prohibit OSV use west of NFS road 24N24, and 24N35 and 24N25Y (considered two unique areas adjacent to one another), north of 24N34. <br> These areas receive little to no OSV use due to steep terrain and risk of avalanches. |
| Prohibit <br> Reduction in open areas | Redraw proposed designated OSV open area in the Yellow Creek area of the Chips Creek Roadless area northwest of Bucks Lake Wilderness. Redraw open area to NFS road 26N26 and ridge above 26N26. <br> Limiting the OSV open area to the ridge removes a steep slope that provides access to a creek. This is not a high use or value area for OSV use. |
| Prohibit <br> Reduction in open areas | Remove proposed designated OSV open area north of Indian Creek in the Chips Creek Roadless area. <br> Removing this small open area protects the semi-primitive nature of the Chips Creek Roadless area. |
| Designate <br> Addition of open area | Designate open area on the west side of Meadow Valley, near NFS road 24N30A, along private land boundary, and include NFS road 24N29X (Silver Lake Road). This allows access from private land to NFS open areas allowing cross-country travel. |


| Prohibit, Restrict, or Designate | Changes |
| :---: | :---: |
|  | LAKES BASIN OPEN AREA |
| Prohibit <br> Reduction in open areas | Remove proposed designated OSV open area in and around the Gold Lake ski trail, adjacent to the Gold Lake staging area, including Gray Eagle Creek (NFS lands west of Plumas County Road 519). The area removed extends from the southern edge of private land near Graeagle, Gray Eagle Creek, the Gold Lake ski trail, and NFS lands that reach the Graeagle Lodge. NFS lands east of Plumas County Road 519 are generally designated as open. <br> This change separates motorized and non-motorized uses, such that OSVs are not crossing or using a non-motorized trail or Gray Eagle Creek. |
| Prohibit and Designate <br> Reduction in open area <br> Addition of open area | Redraw open area in Lakes Basin. Propose designation of open area from the confluence of Jamison Creek (branches to Wades Lake and Rock Lake), to the northeastern point of Rock Lake, to Mt. Elwell, and use ridge toward Graeagle Lodge as boundary change. <br> This open area boundary change results with Rock Lake being proposed for designation in the Lakes Basin open area and excludes the northwestern portion of Mt. Elwell for non-motorized opportunities. <br> Propose designation of NFS lands in section 3 nearest to "A Tree" adjacent to the Tahoe and Plumas National Forests administrative boundary. <br> Adding section 3 near A Tree allows for motorized use from the Tahoe onto the Plumas and provided connectivity from NFS road 23N08 onto Plumas County Road 507. These roads provide access to the larger La Porte open area, La Porte, and Onion Valley. |
| Prohibit <br> Reduction in open area | Remove proposed designated open area in sections 29 and 32 near A Tree Campground in between McRae Ridge and NFS road 23N08, and immediately adjacent to the La Porte and Lakes Basin open area unit boundary. <br> Remove proposed open area designation in section 33 to provide contiguous areas not designated for OSV use within sections 32,33 , and 34 as this has high value to non-motorized users. Designation of NFS Road 23NO8 allows OSV access through the closed area from Lakes Basin to La Porte. |
| Designate <br> Change to NFS road numbers and mileage | Designate NFS road 23N08 as an ungroomed OSV trail to provide access across undesignated NFS lands between open areas, and to provide access to open areas from Sloat. Designation of NFS road 23N08 overlies Lakes Basin and La Porte open areas. |


| Prohibit, Restrict, or Designate | Changes |
| :---: | :---: |
| LAPORTE OPEN AREA |  |
| Designate <br> Addition in open area | Just north of Harrison Campground Redraw the open boundary to include NFS 23N10 extreme eastern portion of the road. Insignificant change for motorized uses, portion of SIA that would become open is extremely steep and densely vegetation and would not likely receive OSV use. |
| DAVIS OPEN AREA |  |
| Designate <br> Additional open area | Designate NFS lands just south of Indian Valley, towards the east near Iron Dyke, along Plumas County Road 208. Designate NFS lands on the eastern edge of Greenville overlaying with NFS road 28N32. This addition provide connectivity from private land and NFS lands proposed for designation for cross county OSV travel. |
| ANTELOPE OPEN AREA |  |
| Designate <br> Additional open area | Designate NFS lands along North Arm in Indian Valley south of Engel Mine to provide access from private land to designated NFS lands as open areas allowing cross-country travel. |
| PACIFIC CREST TRAIL |  |
| Context of PCT and PNF | Seventy-nine miles of the Pacific Crest Trail cross the Plumas National Forest administrative boundary from the Lassen to the Tahoe National Forests. Almost 18 miles of the PCT overlie designated wilderness or special areas, leaving just over 61 miles of PCT to evaluate the purpose and nature of the trail and use of over-snow vehicles. <br> An area not designated for OSV use is not applied when the PCT overlies undesignated NFS lands or when NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT. Undesignated NFS lands do not authorize OSV use and an area not designated for OSV use is not necessary. NFS roads and/or motorized trails intersect, crisscross, or parallel the PCT within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the nonwinter months. <br> An area not designated for OSV use is applied at Bucks Summit, a congested, high-use staging area; the eastern side of the Middle Fork Wild and Scenic River to provide a noise buffer; and from the general area of Onion Valley to McRae Ridge to include the preservation of historic ski trails. |


| Prohibit, Restrict, or Designate | Changes |
| :---: | :---: |
| Increase areas not designated for OSV use | Bucks Summit <br> From Bucks Summit staging area off of Plumas County Road 414, heading south along the PCT, increase areas not designated for OSV use in between two designated and groomed OSV trails: NFS roads 24N29Y and Plumas County Road 119 (Big Creek Road). On the west side of the PCT, the area not designated for OSV use starts along the ridge in between NFS road 24N29Y and the PCT. On the east side of the PCT, the area not designated for OSV use extends from the Bucks Summit trailhead to the Plumas County Road 119. NFS lands adjacent to Plumas County Road 414 near Deadwood Creek and adjacent to private lands were also included in the areas not designated for OSV use. <br> The Bucks Summit trailhead receives both non-motorized and motorized uses. The areas not designated for OSV use provide a noise barrier along the PCT in a congested area. This segment of the PCT provides about 3 miles of gentle terrain to the south of Bucks Summit. |
| Remove areas not designated for OSV use | Intersection of NFS road 24N29Y and Plumas County Road 119 (Big Creek Road) to Lookout Rock <br> Remove entire area not designated for OSV use adjacent to PCT because motorized roads and trails intersect and parallel the PCT within the 500-foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. |
| Remove areas not designated for OSV use | Lookout Rock to Butte Bar Campground <br> Remove entire area not designated for OSV use adjacent to the PCT because a buffer or zone in this section of the PCT is not necessary since it overlies NFS lands that are not designated for cross-country OSV travel. This area is also a Semi-Primitive area ( $\mathrm{Rx}-8$ ) from the 1988 PNF LRMP, and there are very few existing roads. There are no roads or motorized trails in the vicinity of the PCT. |
| Remove areas not designated for OSV use | Butte Bar Campground to southeast corner of section 1 (T22N, R8E) Remove entire area not designated for OSV use adjacent to the PCT because this section of the PCT overlies NFS lands that are not designated for cross-county OSV travel. |
| Remove areas not designated for OSV use | Southeast corner of section 1 to intersection with NFS road 22N56 Remove area not designated for OSV use adjacent to PCT because NFS roads (23N65Y, 23N65YB, and 22N56) parallel the PCT within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. |


| Prohibit, Restrict, or Designate | Changes |
| :---: | :---: |
| Maintain areas not designated for OSV use | Intersection with NFS road 22N56 to east side of private land in section 11 (T22N, R8E) <br> The Fowler Lake area overlaps with a Special Interest Area or Research Natural Area and overlies NFS lands that are not designated for crosscountry travel, so a non-motorized buffer is not necessary within the Fowler Lake SIA. Two parcels of private land overlie the PCT and are not designated for cross-country travel. An area not designated for OSV use is not necessary in these locations. <br> Remove the areas not designated for OSV use adjacent to the PCT from the intersection of NFS road 22N56 and then again from the eastern edge of the SIA/RNA to the eastern edge of the private land parcel in section 11. There are roads adjacent to PCT in Section 15 and there is no non-motorized continuity in this area between the private parcels. |
| Remove areas not designated for OSV use | Private land in section 11 to intersection of Plumas County Road 511 (Forest Highway 120) <br> Remove areas not designated for OSV use adjacent to the PCT because two designated, groomed trails (NFS road 22N60 and Plumas County Road 120) crisscross and parallel the PCT. These roads are within the 500 -foot areas not designated for OSV use originally proposed in the proposed action. The nature and purpose of the PCT is affected by these motorized routes in the non-winter months. |
| Remove areas not designated for OSV use | Plumas County Road 511 to Intersection of Plumas County Road 507 and NFS Road 22N46 <br> Remove areas not designated for OSV use from County Road 511 to the PCT's intersection with NFS Road 22N82X. <br> Maintain areas not designated for OSV use adjacent to the PCT at the intersection with NFS Road 22N82X, around the northeast side of Pilot Peak, and adjacent to the PCT along Bunker Hill Ridge, southeast to where the PCT is within the Semi-primitive Prescription (RX-8). A widened area not designated for OSV use along the PCT both meets the nature and purpose of the trail, and recognizes historic uses of the trail as the 'Lost Sierra Ski Traverse'. |
| Remove non-motorized buffer | NFS Road 22N46 to Tahoe National Forest (administrative boundary) Remove areas not designated for OSV use adjacent to PCT because the PCT parallels NFS 22N46 and then crisscrosses two national forest administrative boundaries numerous times. Generally, NFS lands are designated as open on both national forests; the Tahoe National Forest selected alternative does not include areas not designated for OSV use adjacent to the PCT. Given the PCT crisscrosses administrative boundaries, areas not designated for OSV use adjacent to the PCT in only the Plumas National Forest results in fragments of non-motorized areas that are impractical for implementation. |


| Prohibit, Restrict, or Designate | Changes |
| :---: | :---: |
|  | GENERAL CHANGES |
| Add to FEIS | Provide OSV use and designation information at designated staging areas, trailheads, parking areas, etc. Add to monitoring section of FEIS. |
| Remove from designation <br> Reduction in designated trails | Generally, remove designated ungroomed OSV trails that overlap with open areas. <br> All designated ungroomed OSV trails that cross private ownerships or restricted and prohibited areas, or connect open areas should remain for designation to illustrate the trail is needed to access an otherwise prohibited or restricted area. |
| Remove county roads from designation <br> Maintain county roads proposed with grooming (on map, but not designated) | Our current action alternatives propose to designate county roads as NFS OSV trails and in most cases grooming. Based on current jurisdiction in Infra, these roads are not aligned with Travel Management Rule, Subpart C regulations, such that the Forest Service should not designate county roads as NFS OSV trails. Remove county roads, with county jurisdiction, from all action alternatives, from proposed designation as NFS OSV trails. <br> Maintain county roads, with county jurisdiction, in all action alternatives that are proposed for grooming. We assume we have or will have agreements to continue grooming county roads. These should be illustrated on our alternative maps as "other groomed routes" or something of that nature. |


| Prohibit, Restrict, or Designate | Changes |
| :---: | :---: |
| Vehicle Class <br> Change definition <br> Width to PSI | Change vehicle class definition from width to pounds per square inch. From the Tahoe NF ROD: <br> "Designating where different classes of OSVs can be used is one of the approaches in my decision to ensure impacts to natural and cultural resources underlying the snow are minimized, consistent with Subpart C of the Forest Service's Travel Management Regulations (36 CFR 212.81(d)) while also providing OSV users with a safe and enjoyable recreation experience. In the DEIS, Alternative 2 proposed designating classes of vehicles based on vehicle width. This approach elicited public concerns that vehicle width is not necessarily directly related to adverse resource impacts, and basing OSV use designations on vehicle width would unduly limit recreation opportunities for OSV users with machines that were not causing adverse impacts to resources underlying the snow. To respond to these concerns, I have changed the approach for defining classes of vehicles. My decision bases class of vehicle on the ground pressure exerted by different types of OSVs to better align with potential resource impacts (as heavier vehicles create deeper tracks and can potentially cause resource damage). The revised Class 1 OSVs include those that typically exert a ground pressure of 1.5 pounds per square inch (psi) or less. This class includes snowmobiles, tracked motorcycles, tracked all-terrain vehicles (ATVs), tracked utility terrain vehicles (UTVs), and snow-cats. The revised Class 2 OSVs include those that typically exert a ground pressure of more than 1.5 psi . This class includes tracked four-wheel drive (4WD) sport utility vehicles (SUVs) and tracked 4WD trucks. Under this decision, Class 1 OSVs will be able to operate on areas and trails designated for OSV use while Class 2 OSVs will be restricted to designated OSV trails available for grooming." |
|  | Miscellaneous NFS land parcels that were inaccessible islands were deleted. We did not catch them all. |


[^0]:    ${ }^{1}$ Please also refer to the current quarterly schedule of proposed actions (SOPA) for the Plumas National Forest for other reasonably foreseeable future actions.

[^1]:    Plumas National Forest

[^2]:    ${ }^{2}$ The decision resulting from this analysis would not designate National Forest System roads for public OSV use. Public OSV trails that would overlay existing National Forest System roads would be designated as National Forest System trails where public OSV use is allowed.

