



CALIFORNIA
NATIVE PLANT SOCIETY

December 22, 2024

Reviewing Officer: Jennifer Eberlien, Regional Forester, USDA Forest Service
1323 Club Drive
Vallejo, CA 94592

Responsible Official: Rick Hopson, Acting Forest Supervisor, Plumas National Forest, USDA Forest Service
159 Lawrence Street
Quincy, CA 95971-6025

RE: North Fork Forest Recovery Project #64028

Friends of Plumas Wilderness provided project-specific written comments to Project #64028 on November 6, 2023 and with conservation partners Wildlands Network and California Native Plant Society on September 9, 2024.

Thank you for the opportunity to provide additional input on the North Fork Forest Recovery Project. We appreciate that in the November 2024 Draft Decision Notice, Acting Plumas National Forest Supervisor, Rick Hopson acknowledges the value of comments provided by the public and that several changes were made to the project between the Draft EA and Final EA in response to comments. Friends of Plumas Wilderness board members Ron Logan and Darrel Jury met with Sierra Institute and Plumas National Forest staff on October 29th for a status report on the Project. Engaging partners even earlier in the planning process would be beneficial for all parties involved.

Friends of Plumas Wilderness and allied conservation organizations applaud these changes in the Final EA:

- The addition of language guiding management of waterways eligible for future designation as Wild & Scenic Rivers.
- Clarification that strategic fire management features are not being added as NFS routes.
- Restriction of motorized uses on a section of proposed trail near Mt. Jura that falls within the Genesee Valley Special Management Area.
- The EA defines mature and old-growth forests and describes an identification and review process for managing mature and old-growth stands following current USFS direction.

We commend the Plumas National Forest for listening to the public and incorporating these recommendations. Friends of Plumas Wilderness and California Native Plant Society believe the project could be further improved by eliminating proposed motorized routes from areas with sensitive natural or cultural resources.

Relevant Forest Service Direction:

Plumas National Forest Travel Management Plan (2010)

1. The motorized trails proposed in the NFFR Project exceed what was contemplated in relevant travel management plans.
 - a. The 2010 Plumas Travel Management Plan states the Forest road and trail network of 4,482 miles provides ample motorized access to public lands, dispersed recreation activities, campsites, trailheads and popular destinations.
 - b. The 2010 Plumas Travel Management Plan added 234 miles of trails to the National Forest Transportation System.

- c. Comments submitted on September 9, 2024 by Friends of Plumas Wilderness, Wildlands Network and the California Native Plant Society state: "Development of the Plumas National Forest MVUM [Motor Vehicle Use Map] was extremely contentious and involved litigation; making any changes to the MVUM should incorporate adequate opportunities for public input."

Minimization Criteria - Executive Order 11644 (1972) & Executive Order 11989 (1977)

1. Presidents Nixon and Carter issued executive orders to "establish policies and provide for procedures that will ensure that the use of Off-Road Vehicles [ORVs] on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands."
 - a. When designating areas or trails available for ORV use, agencies must locate them to:
 - i. minimize damage to soil, watershed, vegetation, or other resources of the public lands;
 - ii. minimize harassment of wildlife or significant disruption of wildlife habitats; and
 - iii. minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands.
 - b. Minimization Criteria provided to Friends of Plumas Wilderness for the Mt. Jura and Greenville to Long Valley E-Bike Trails are inadequate as they do not accurately describe potential impacts to wildlife and their habitat or conflicts between existing or proposed recreation uses.
 - i. Motorized trails proposed in the Greenville area are within a least-cost wildlife movement corridor identified for North American wolverine, a federally listed threatened species.
 1. The Draft TMR [Travel Management Rule] Criteria for Areas and Trails for E-Bike Trails Greenville to Round Valley states the trail or area does not contain habitat for sensitive forest carnivores.
 2. The Greenville Area provides a wildlife movement corridor identified for the American Wolverine. See attached **Greenville Area Proposed Trails and Wolverine Corridor Map**.
 3. The US Fish & Wildlife Service listed the North American wolverine in the contiguous US as a threatened species under the Endangered Species Act in November 2023.
 4. The Greenville and Mt. Jura areas also provide habitat for gray wolf. Following a February 10, 2022 court order, gray wolves in the contiguous 48 states and Mexico - with the exception of the Northern Rocky Mountain population - are now protected under the Endangered Species Act as threatened in Minnesota and endangered in the remaining states.
 - ii. Constructing motorized trails in the Mt. Jura Citizen Inventoried Roadless Area creates conflict between motor vehicle use and proposed recreation uses on NFS lands.
 1. The Draft TMR Criteria for Areas and Trails for E-Bike Mt. Jura Trail states the trail does not create conflicts between motor vehicle use and existing or proposed recreation uses of NFS lands.
 2. In 2017, The Wilderness Society completed a field survey of Citizen Inventoried Roadless Areas on the Plumas National Forest. Development of the proposed Mt. Jura Motorized Trail conflicts with the proposal to protect the Mt. Jura Inventoried Roadless Area.
 3. Comments submitted by Friends of Plumas Wilderness, Wildlands Network and California Native Plant Society on September 9, 2024 state: "A portion of the 11-mile motorized trail shown on the Mt. Jura Area Proposed Trails Map A-11 (p. 133 of the Draft EA) encroaches within the 19,140 Mount Jura Citizen Inventoried Roadless Area."

4. "The CIRAs [Citizen Inventoried Roadless Areas] mapped by The Wilderness Society in 2017 preceded proposed motorized routes subsequently identified by Sierra Buttes Trail Stewardship which are identified on the Mt. Jura Area Proposed Trails Map."
2. More trails currently exist than the Forest Service can maintain.
 - a. On December 10, 2024, Friends of Plumas Wilderness board members Ron Logan and Darrel Jury drove and hiked existing motorized routes in the vicinity of Mt. Jura. Routes 10M34 and 10M48 have not been maintained and are impassable because dozens of trees that burned in the 2021 Dixie Fire have fallen across the road. Sections of these motorized routes have been significantly eroded following the Dixie Fire and need repairs.
 - b. Minimization Criteria for the Mt. Jura Trail and Greenville Area provided to Friends of Plumas Wilderness state the Plumas National Forest is only able to maintain 50-75% of its existing trails.
 - c. Comments submitted on September 9, 2024 by Friends of Plumas Wilderness, Wildlands Network and the California Native Plant Society emphasize: "The Plumas National Forest is responsible for managing over 3,000 miles of roads, many of which are in poor condition. Adding routes to the Plumas National Forest road network without closing others is unsustainable."

Conserving and Restoring Terrestrial Wildlife Habitat Connectivity and Corridors in the United States
(Secretary's Memorandum 1077-013 (October 21, 2024))

1. Actions Ordered pursuant to the Habitat Connectivity and Corridors Memorandum include:
"Incorporate consideration of terrestrial wildlife habitat connectivity and corridors into relevant planning processes, programs, and assessments, as appropriate, including: (1) USFS land management plans, fuels reduction and wildfire crisis planning..."
 - a. Construction of the Mt. Jura Motorized Trail as shown in the Final EA would sever wildlife corridors that bridge public lands between the Grizzly Peak Inventoried Roadless Area and the Mt. Jura Citizen Inventoried Roadless Area. Public lands located in sections 1 and 2 in T. 25 N., R. 10 E. and section 7 in T. 25 N., R. 11 E. provide important wildlife corridors of undeveloped land along the Genesee Valley Road (Plumas County Road 112) and allow large mammals to move between large roadless areas without crossing developed private lands. The construction of a motorized route parallel to the Genesee Valley Road would be an additional barrier to the movement of large mammals traveling between Grizzly Ridge and Mt. Jura. See attached **Key Wildlife Corridors Near Mount Jura Map**.
 - b. The California Terrestrial Habitat Connectivity Map developed by the California Department of Fish & Wildlife shows Grizzly Ridge and Mt. Jura as a single Natural Landscape Block and Indian Creek between the two roadless areas as an Essential Connectivity Area. Construction of a motorized route within these important wildlife habitats would increase, not minimize, impacts on wildlife and their habitat.

Objection & Remedies:

Objection: Friends of Plumas Wilderness and the California Native Plant Society object to the proposed development of motorized trails in the North Fork Forest Recovery Project.

FoPW raised our concerns regarding motorized trail development in our November 6, 2023 scoping comments and again with conservation partners in our September 9, 2024 comments to the Draft EA. In our scoping comments we said: "Alignment of the proposed motorized route on Mt. Jura should be realigned to minimize encroachment into the 19,140 acre Mount Jura CIRA." Comments submitted by FoPW, Wildlands Network and the California Native Plant Society state: "Friends of Plumas Wilderness and conservation allies demand that the PNF and SI minimize motorized trail development within the Mt. Jura CIRA."

Remedy 1: Plumas National Forest and Sierra Institute work with the Northern Sierra Wildlife Coalition to relocate or realign proposed motorized trails to avoid critical areas.

California Native Plant Society, Friends of Plumas Wilderness and ten national, state and regional conservation organizations are members of the Northern Sierra Wildlife Coalition, whose goal is to pool capacity, resources, and expertise to advance coordinated, data-driven land management to benefit plant and animal populations on the landscape scale. Incorporating information possessed by members of the Northern Sierra Wildlife Coalition into the design and layout of motorized trails proposed in the North Fork Forest Recovery Project could more effectively minimize impacts on natural resources and existing uses.

Remedy 2: Eliminate proposed motorized routes from the North Fork Forest Recovery Project.

Members of the Northern Sierra Wildlife Coalition have met with Region 5 Forest Service leaders on several occasions to share concerns related to the recent proliferation of motorized route proposals in the Sierra Nevada. On December 19, 2023 members of the Coalition submitted a letter to Forest Service Regional Forester Jennifer Eberlien. See attached **ORV Use Principles Letter**. The Regional Forester replied to the Coalition's ORV Use Principles in a letter dated June 24, 2024. In response to the Regional Forester's letter, members of the Northern Sierra Wildlife Coalition made two requests regarding the Connected Communities Project (See attached **USFS June 24, 2024 Response Letter**):

1. This project [Connected Communities] requires Travel Management Planning and a Cumulative Environmental Analysis.
2. No planning and implementation of smaller-scale projects should occur until the public has had an opportunity to participate in scoping for the entire Connected Communities Project.

The Greenville Area Motorized Trails and Mt. Jura Motorized Trail proposed in the North Fork Forest Recovery Project are part of Sierra Buttes Trails Stewardship's Connected Communities Project. As such, the undersigned request that these proposed motorized routes be eliminated from the North Fork Forest Recovery Project and analyzed with the entire Connected Communities Project.

We look forward to sharing our objection to the North Fork Forest Recovery Project and suggested remedies with Forest Service and Sierra Institute staff. For future projects we look forward to being involved at the earliest possible stage. If there are any questions related to points raised in this letter please contact us.

Sincerely,



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