



February 19, 2016

Inyo National Forest
351 Pacu Lane, Ste. 200
Bishop, CA 93514
Attn: Erin Noesser
Email: elnoesser@fs.fed.us

RE: Subpart C Winter Motorized Travel Planning Process

Dear Planning Team:

The BlueRibbon Coalition (BRC) appreciates the opportunity to submit these early pre-scoping comments for the Over-Snow Vehicle (OSV) Use Designation Planning Process for the Inyo National Forest. This document shall not supplant the rights of other BRC agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received.

BRC believes there are components of the winter recreation program that could be improved, and that this designation process offers an appropriate and efficient opportunity to address those elements. These comments are broadly structured into two categories consisting of specific elements that we request be included in one or more of the action alternatives under active consideration by the Forest Service, and broader concepts or themes to consider incorporating into the process.

SPECIFIC ALTERNATIVE COMPONENTS

(1) Continue existing designations.

The FS should adopt the current designations that authorize OSV use on the Forest in all of the action alternatives.

(2) Adopt the SAE J2567 sound standard for OSV.

BRC encourages the Forest to take the important step of regulating sound produced by OSV. We feel strongly, and join OSV manufacturers and industry representatives, in accepting the

responsibility of looking for opportunities to quantify, standardize, and improve snowmobile technology. The OSV community at large is generally advocating that states, and units if needed, adopt the OSV Sound Test – SAE J2567. BRC joins those efforts and ask that you include this as a component of an action alternative.

(3) Review nonmotorized land designations.

We believe that certain enhancements might be possible if the Forest acknowledges the legitimacy of certain routes through areas designated for nonmotorized or semi-primitive uses. Review current non-Wilderness areas that could be reopened or have routes cherry-stemmed routes for connectivity and/or touring opportunities. Many 1980-1990s-era Forest Plans used non-Wilderness “non-motorized” classifications to protect the area from timber production or summer wheeled recreation. OSV recreation (and OHV for that matter) was simply not at the table or given substantive consideration during these programmatic planning efforts. In some areas these classifications such as “Near Natural” or “Semi-Primitive Non-Motorized” had the effect of functionally banning OSV use including designation of cherry-stemmed routes. We support the growing effort in the agency, such as in the Kootenai and Panhandle Forest Plan revisions, to recognize a designation for “primitive and winter motorized” uses that adapts to the differences between OSV and OHV uses and impacts.

BRC asks that routes or areas of this nature be added to one or more of the action alternatives. The designation of additional routes and areas should be based on input from local OSV users.

(4) Modification of area prohibitions.

BRC believes the 2005 Travel Management Rule, including the amended Subpart C, provides the agency the authority to make adjustments to previous land classifications to provide connectivity or to otherwise enhance functionality to the OSV network of roads, trails, and open riding areas.

ADDITIONAL BROAD MANAGEMENT THEMES

BRC recognizes the agency seeks to complete an efficient and successful designation of its OSV management program. However, the attention and allocation of resources to this effort might be wisely applied to address key issues. BRC asks the Forest to consider whether it might be appropriate to include the following components in at least one of the action alternatives.

(5) Update grooming program.

The grooming program should be dynamic to allow for the grooming or non-grooming of trails based on use levels and snowfall amounts. Consider narrow groomed trails (using equipment with 8 feet or narrower width) to allow for utilizing more OHV trails where a larger groomer cannot fit. These narrow trails could be for an enhanced backcountry “snow trail” experience.

(6) Review and update parking and staging facilities.

Winter recreation patterns/opportunities can be limited or altered by snow depth. The agency should strategically and actively incorporate this element into its management strategy, by analyzing current parking/staging opportunities and considering options to expand or create new parking/staging areas. It is often beneficial to create higher elevation staging options to accommodate low snow years. Some staging areas present unacceptable traffic or safety risks. On many Forests, the trailhead parking including turnarounds for larger vehicles such as motorhomes or extended cab pickups with large trailers is not adequate. The FS should engage related partners such as state or local road departments and counties to address parking/staging needs or road use agreements or county route designations where said needs are addressed in the early planning stage.

Evaluation of the staging area issue will allow us to adapt to the lesson learned from Subpart B OHV management, where the agency sometimes developed an OHV route network in an “environmental” vacuum without considering broader concerns and engaging various government partners in the scoping process to add functionality to the trail and area network.

(7) Conflict of uses.

BRC believes the “conflict of uses” issue has generally been created and emphasized by anti-OSV advocates who are looking for any opportunity to restrict or eliminate OSV use. Despite their aggressive litigation efforts, there are few, if any, court decisions that have forced an agency to restrict any motorized recreation based on alleged “conflict.” There are many strategies that can be employed to manage the ever-growing human population that desires to recreate in the National Forest System. We generally support the concept of “shared use.” As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. There will always be a handful of pathologically disgruntled individuals seeking their own private rejuvenation in the National Forests. These outliers should not dictate policy or use designations, and should be handled the same way as children testing parental boundaries.

Contrasted to those using “conflict” in a transparent effort to put a thumb on the scales of management balance, there are legitimate concerns that usually reflect the simple fact there are too many people trying to enjoy the same areas at the same time. These “conflicts” can occur within user groups or modalities as often as they occur between them. The agency should consider strategies to publicize and manage these situations. One option might be to designate non-motorized companion trails along motorized routes or designate/groom non-motorized only trails to Wilderness or non-motorized land classification to reduce conflict of uses. Such efforts might be coupled with a targeted information campaign to direct non-motorized uses to non-motorized land classifications. Another element might be to consider enhanced staging/parking for non-motorized users so as to provide better access to non-motorized areas. Finally, we have always been and remain strong advocates of an active and effective enforcement program, so that users who violate or choose to remain criminally ignorant of management prescriptions suffer meaningful adverse consequences. All users need to understand and

respect the fact that their use of our National Forests is a privilege to be shared with others under the terms established by applicable law.

(8) Encourage robust stakeholder involvement.

It is important to encourage early participation with local OSV clubs, concessionaires, and OSV rental companies to review current functionality of the OSV program for issues such as needs for seasonal or permanent stream crossings (i.e. installing half culverts, OSV bridges, etc.), connectivity, trails for both beginner and skilled riders, looped opportunities, and adequate open or play areas where new OSV users can practice and improve their skills. The best program elements or concepts are only as good as their tailored application to the needs of a particular area or user community.

(9) Review efficacy of signing and education programs.

BRC encourages the agency, along with all stakeholders, to review and update the current outreach and signing as needed for route identification, Wilderness boundaries, painted parking lines and vehicle circulation at staging areas, notification of users entering a fee area, and related issues. Recreation management, and particularly OSV/winter management, is often more of an exercise in social engineering than addressing physical resource impacts. Many “impacts” to the human environment could be avoided if users were better informed and given a range of recreation options.

(10) Consider an appropriate “all pay” user fee program.

If funding is a problem, the unit should consider a special user-fee pass/permit system “Fee-Demo” that is specific to an area, Forest, or Ranger District. Consider on-site self-service stations where a pass can be purchased to support on-the-ground services at said unit. Fees would be collected from both motorized and non-motorized users benefitted by any necessary management activities.

(11) Pacific Crest Trail crossings

The Pacific Crest Trail (“PCT”) is a non-motorized trail that runs north-south through the western U.S. and along the crest of the Sierra Nevada Mountain Range in California. It exists primarily on Forest Service lands including the Forests bound by the Snowlands settlement agreement. The Eldorado and other Forests should review public comments and internal reviews with field OSV staff and patrol agents to ensure that it designates PCT crossings that retain the current form and function of the OSV program. Depending on snow depth, it can be virtually impossible for users and law enforcement to identify specific and narrow crossings. The agency should grant itself authority to designate crossings and related widths of crossings or corridors to geological or topographical features that make sense and are enforceable.

CONCLUSION

BRC appreciates this opportunity to participate in the management process and to work alongside the Forest Service to improve the winter recreation program on the Inyo National Forest. Please consider our comments, and do not hesitate to contact us in this designation process as well as the ongoing management effort.

Respectfully submitted,

Don

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