March 13, 2016

OSV Project Manager

USFS Inyo National Forest

Bishop, CA 93514

Re: OSV Use in the Mono Basin

Our wildlife is precious and they need habitat on their terms to survive. Sometimes, we can share the habitat, if our activities aren’t intrusive. However, OSVs are very intrusive and do not belong in the Mono Basin, especially in the Mono Basin National Forest Scenic Area (MBNFSA).

I believe Global Warming will naturally limit or prevent snowmobile activity in the Mono Basin for many years to come. However, on principal, the Mono Basin National Forest Scenic Area should be closed to snowmobiling. The MBNFSA was established in the 1984 California Wilderness Act under Title III, “…*to protect its geologic, ecologic, and cultural resources*…”. The purpose of the Scenic Area was to preserve the scenic and ecological characteristics and to prevent any further changes that would detract from that 1984 level.

Land use of the Mono Basin was changed with the establishment of the Mono Lake SNR in 1981 and further changed with the 1984 CA Wilderness Act. The Wilderness Act gives the natural beauty and health of the ecosystems precedence over the historical uses, should historical uses take away from the scenic value of the area or disrupt the ecosystems. Much has been done since then to bring back the riparian stream corridors and wetlands after 40 years of stream diversions and much has been done to develop ecotourism here. After 30 years, historical uses have died away and are becoming part of the history of the area while the current focus is on maintaining the scenic and natural qualities of the area.

Title III section (j) states, “Existing community recreational uses, as of the date of enactment of this title, shall be permitted at the levels and locations customarily exercised.” At that time, when snow was abundant in winter, only a few local residents had snowmobiles and usually used them for local travel or to play on the hill behind the town. By law, this level of OSV use is not to be exceeded. Furthermore, the 1989 MBNFSA Comprehensive Management Plan mapped out 4 levels of land use within the Scenic Area. It designated only one area on the northeast side of Mono Lake as appropriate for OSV use. However, that OSV area is juxtaposed to land that is designated as a no-development, quiet zone. I would argue that the 1989 OSV area was poorly placed and should be eliminated closing the entire Scenic Area to OSV use. The current snowmobile map allows snowmobiles up the hillside behind LV well into a no development zone of the Scenic Area. This is in violation of the 1989 Management Plan. Listed below are excerpts from the plan that highlight the priority given to maintaining bio-diversity over OSV use.

The Mono Basin has a variety of animals living throughout the basin that are active during the winter. The Mono Lake Committee’s seven wildlife cameras and the USFS’s wildlife camera up Lee Vining canyon, as well as local sightings, tracks, and trapping records can attest to this. There are bears, bighorn sheep, mountain lions, bobcats, coyotes, grey foxes, ringtail cats, skunks, badgers, weasels, pine martens, squirrels, rodents of all kinds, rabbits, sage grouse, antelope, deer, and 80 resident species of birds that live in the basin and up the canyons. OSVs are noisy and disruptive to wildlife and snowmobilers are known to chase animals, especially coyotes, for fun. Wildlife will hide when they hear the vehicles and not be able to search for food while OSVs are in the area. March-May is a particularly sensitive time of the year for animals. They mate and give birth during the spring. It is stressful to have snowmobiles unwittingly circle their birthing dens. Plus subnivean tunnels that mice, squirrels, and rabbits travel in, can be crushed along with the sagebrush from the weight of the snowmobile and riders. When the snow is compacted, the snow is less insulated and colder. The animals need to consume more calories as a consequence to stay alive and some will die because of it. This has a ripple effect up the food chain to the predators. Per the 1989 Management Plan, the USFS is to determine the minimum snow depth to protect the animals that live and travel under the snow and temporarily close the Scenic Area to OSVs when it doesn’t meet that requirement, yet this is not reflected on the OSV trails maps.

The road-less area from Horse Meadow to Grant Lake that skirts the edge of the Ansel Adams Wilderness qualifies as wilderness. To maintain that status of potential wilderness, it should not be open to OSVs. The Parker Bench, Parker drainage, Bohler Canyon, and Horse Meadows are home to many meso-predators who can live there without intrusive humans on foot, in cars, or OHVs. However, they are not safe there from OSVs.

To allow OSVs in the MBNFSA degrades its bio-diversity and scenic qualities and so, is in violation of the 1984 California Wilderness Act. Because of the wilderness potential in parts of the Mono Basin that are outside of the Scenic Area and because wildlife inhabits the entire Mono Basin, snowmobiles should be banned from the Mono Basin, except for the local residents who have been grandfathered in. The state-sponsored California Essential Habitat and Connectivity Project designates the entire Mono Basin as a natural landscape block and as an eco-regional priority (Figure 3.21 on pg. 114) allowing species to migrate due to Climate Change. The Mono Basin serves as a migration corridor, which should not be put in jeopardy by OSV use.

Sincerely,

Lynn Boulton

Lee Vining, CA

Excerpts taken from the MBNFSA Comprehensive Management Plan of 1989:

pg. 50:

“GOAL – Manage habitats to promote healthy ecosystems and provide for diversity of wildlife species. Maintain viable populations of native vertebrates and invertebrates and enhance habitat of native species of special interest to the Scenic Area.”

pg. 37—“Coordinate Forest off-highway vehicle planning and funding with Federal, state and local agencies, and private land owners where appropriate.

Designate OHV/OSV trails and open areas to minimize conflicts with existing or potential developed sites, private property, special uses, adjacent wilderness, administrative areas, cultural resources, riparian areas, key wildlife habitat, and sensitive watershed areas.

When necessary, close critical wildlife and fish habitat to OHV/OSV use.

Do not permit recreational use of wheeled vehicles over snow except in designated areas.

Permit OSV use only when there is sufficient snow cover to protect the soil and vegetative resources.”

SCENIC AREA STANDARDS AND GUIDELINES:

“Except as otherwise provided for in special use permits or elsewhere in this plan (see Action Item 10f in this section), use (including use on relicted lands) by motorized vehicles will be allowed on existing designated routes and parking areas not posted as closed.”

pg. 38:

“Maintain the east, northeast, and southeast sides of the lake, Warren Bench, and relicted lands within the “No Development Zone” prescription, as areas which provide a high level of solitude.”

“Organized, motorized recreation events will normally not be permitted.”

pg. 39:

“Limited Development Zone – Allow the range of recreational experiences, activities, and opportunities consistent with the ROS classes SPNM and SPM. Restrict or prohibit, if necessary, any public use, which causes significant modification of natural resources.

If resource values are threatened, or roads are not needed to accommodate appropriate public use, close roads, restrict access, or otherwise resolve the issue, in accordance with Action Item 10h.

pg. 41: Action Items

“10f. Implement OSV direction as shown on the OSV map for the Scenic Area. Work with representative group to resolve future issues. Incorporate direction in the Inyo National Forest OSV/OHV Use Plan—On-going”

“10h. Implement OHV direction as shown on the OHV map for the Scenic Area. Close and rehabilitate routes identified by the Scenic Area Motor Vehicle Use Work Group. Work with this group to resolve future issues. Incorporate direction in the Inyo National Forest OSV/OHV Use Plan.”

pg. 51:

“Bald Eagle

Manage for recovery…Use the presence of bald eagles and results of the habitat capability model for the species to establish the existing and potential wintering areas, including winter roosts, foraging areas, and daytime perches.”

The map shows only one area open to OSV in the Scenic Area on the NE side of the lake which, according to the NEW Alternative Map, is in the “limited development zone”. All relicted lands are specifically closed.

pg. 18:

“Limited Development Zone-The purpose is to provide for relatively undisturbed areas where human influence is limited and wildlife, visual, and other natural values generally take precedence.

Lands within this prescription usually have 4WD access, maintain natural appearing landscapes, and result in experiences, activities and opportunities consistent with Semi-primitive Motorized (SPM) and Semi-primitive Non-motorized (SPNM) ROS classes. There are few areas within this zone where the visitor will encounter many other people.