



Range of Light Group
Toiyabe Chapter, Sierra Club
Counties of Inyo and Mono, California
P.O. Box 1973, Mammoth Lakes, CA, 93546
RangeofLight.sc@gmail.com



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Lesley Yen, Forest Supervisor
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Submitted online: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61466>

RE: Pre-scoping OVS Use Designation

Dear Supervisor Yen:

The Range of Light Group (ROLG) is part of the Toiyabe Chapter of the Sierra Club and consists of 400 Sierra Club members in Inyo and Mono Counties. We treasure our public lands, forests, and wildlife. Many Sierra Club members cross-country ski, snowshoe, hike, bike, and even snowmobile in winter in the Inyo National Forest. On behalf of the Sierra Club's Range of Light Group Executive Committee, I'd like to express our thoughts on the Over Snow Vehicle management plan.

Conflicts with Non-Motorized Recreation

There have been many conflicts between OSVs, people who go mudding, and who ride fat bikes with Nordic skiing. There are more people who ski than snowmobilers. Snowmobilers impact non-snowmobilers, but it is not the other way around. One problem area in particular is the Obsidian Dome. Trucks ruin Nordic ski routes when they drive on a road that the skiers use. Skiers can use the road when there are only a few inches of snow; not enough to ski outside of the road or for Caltrans to make a berm to block vehicles that want to drive on it. The road entrance could be gated and closed in winter to prevent this rather than rely on Caltrans to make a berm. Snowmobiles also use up powder snow faster than skiers and fat bikers. Although it is clear that the east side of Highway 395 is for OSVs and the west side is for Nordic skiing, there have still been incidents with OSVs using both sides of the highway.

We would also strongly recommend that snowmobiles not be allowed in the Mammoth Lakes Basin after April 14 at all. This is a popular area for local people and visitors to walk in the spring and enjoy the beauty and quiet of the forest and lakes. There are many other areas for snowmobiles, but few places that visitors know where to go.

Snowmobiles do not have to be everywhere. Snowmobiles and mudding trucks are intrusive and leave tracks that make it hard to ski on. They fundamentally change (for the worse) the experience for everyone else. All other aforementioned snow activities, such as Nordic skiing and snowshoeing have a quiet, peaceful ambiance. Having loud and fast snowmobiles suddenly burst upon the scene ruins the experience for the non-motorized adventurers.



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Mammoth Mountain Ski Area offers snowmobile tours that are good because they control where a good number of visitors go and because they teach them the rules by example. However, when a long group of snowmobiles pass Nordic skiers, the exhaust and noise is intense. The Inyo NF should consider requiring MMSA to start converting to the use of electric snowmobiles as part of their special use permit.

Protecting Wildlife

The Sierra Club is primarily concerned about motorized winter recreational impacts on wildlife. While non-motorized forms of winter recreation can impact wildlife, motorized vehicles have a much larger impact on wildlife. The goal of EO 11644 is to minimize the harassment of wildlife and significant disruption of wildlife habitats. Snowmobilers have been known to chase coyotes, which is clearly harassment. A more common problem is the noise and close proximity of snowmobiles to hidden wildlife that stresses them or forces them to leave.

We strongly ask for a minimum snow depth of 18 inches before snowmobiling is allowed. Many small mammals, i.e. deer mice, shrews, and voles hibernate or live under the snow, which helps them survive harsh winters. Northern goshawks and pine martens depend upon these small mammals. If their prey declines, they decline. Most research shows the most negative impact occurs at a snow depth of 30 cm or less (12 inches). A snow depth greater than 30 cm would prevent the subnivean tunnels from being crushed or the snow from being compacted, especially in areas of sensitive species e.g., the yellow-legged frog. Compacted snow reduces the oxygen content that allows animals to live under the snow. Studies by Wanek (1971) and Neumann and Merriam (1972) documented that snow compaction also reduces thermal insulation of snow and increases small mammal winter mortality. They also found snow compaction reduces soil bacteria.

Snow compaction also negatively impacts plants too in addition to snowmobiles tearing plants that aren't completely covered by snow according to Tim Mullen's dissertation (2014). When the snow is compacted, the cold air reaches the ground and reduces plant growth and delays seed germination. Although he found that damage starts at 30 cm (12 inches) it was not enough coverage for meadows and wetlands. We'd like to see an 18-inch minimum for all cross country snowmobiling and a 12-inch minimum for OSV groomed tracks or an 18-inch minimum across the board if that would be easier for all. Plus, a higher minimum would provide a cushion should the snow melt in between measurements.

If a minimum snow depth is established as we hope, then the Forest Service will need to let the public know when the snow depth allows snowmobiling and when it doesn't. There might need to be a website that people can visit with a map of the snowmobile areas and a daily update as to whether or not they are open. Snow depths will need to be frequently measured throughout the winter as the snow depths will vary through time and by location i.e., after storms and as the snow melts. The Inyo National Forest will experience more unpredictable winters with many months of thinning snow that the public is likely to use.



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All areas where Bi-state sage grouse hang out in winter and anywhere within hearing of OSVs should not be included in a designated OSV area. A study shows that noise that exceeds the ambient noise level by 10 dBA affects them. This would include a large area east of Highway 395 in Long Valley, an area around Grant Lake to Parker Meadow, and Sagehen.

All areas where bears den should not be in designated OSV areas. If bears start appearing in a designated area, then the area should be closed.

We would also like to recommend that sensitive areas be closed to snowmobiles i.e., Sierra Nevada Red Fox habitat, upper Lee Vining Canyon home to many species including endangered and sensitive species and a popular backcountry and nordic ski area, areas close to wilderness such as along the San Joaquin Ridge and Minaret Vista, the Mono Basin Scenic Area.

It would be wonderful if the USFS were to give presentations to the local high schools as well, explaining the rules and the reasons for them. I've had high school kids tell me how much fun it is to chase coyotes around in their snowmobiles; not thinking about how that coyote is living on a shoestring of calories in the winter and may later die as a consequence. Educating the public on the needs of the wildlife is sorely needed. Here is an opportunity to do so.

Streams and Lakes

Consider a buffer zone around all lakes and streams to keep pollution from the OSVs out of the streams and lakes. OSVs release ammonium, nitrate sulfide, benzene, and toluene.

Designated Areas

Motorized winter recreation has been growing and now there are many free-ranging snowmobiles touring extensively in all parts of the forest. We wholeheartedly support the plan to have designated areas for snowmobile recreation where everywhere else is closed by default. Areas we believe should be closed are: all of the Tioga Pass area, Lee Vining canyon, part of the Sherwins, Mammoth Lakes basin, Minaret Summit, sage grouse habitat areas east of Highway 395, in addition to what is already designated as closed in the current winter recreation map.

A Management Plan is Needed

A management plan is needed to go along with a map of the designated OSV areas. The plan would address signage, how recreation conflicts are reported and addressed, how snow depths are maintained and communicated to the public, how often water quality and vegetation and soil conditions are checked, how wildlife impacts will be measured, and how rules will be enforced. It won't be enough to just make the maps available and assume the goals of the minimization executive orders will be achieved. A plan would explain how the Forest Service will systematically check and ensure the minimization requirements are met.

Signage is especially important because OSVs are free ranging. Even with a map, it is not possible to know when one has wandered into a wilderness area or outside of the designated area.



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Flagging or signs on trees will be needed to mark boundaries. Maps should be available at the OSV trailheads as well as on the web and at visitor centers.

Enforcement

Because the Inyo National Forest is so large, it is hard to police the OSV use and abuses do happen. This tells me that too much area is open to OSV use for the Forest Service's budget to police.

Given this, and if the Forest Service was to apply all of the best management practices to protect wildlife and the water quality of our streams and lakes¹, there aren't many places to locate OSV play areas. We are sorry to ask that OSVs be restricted, but our wildlife is more important than this one method of recreation. It is also a form of recreation with a limited future due to climate change. Perhaps the next step in the NEPA process could propose alternatives with different levels of snowmobile exclusion.

Thank you for the opportunity to provide input. We look forward to fruitful engagement in the development of this plan.

Sincerely,

Lynn Boulton, Chair
Range of Light Group, Toiyabe Chapter
Sierra Club

¹ Winter Wildlands Alliance, Snowmobile Best Management Practices for Forest Service Travel Planning: A Comprehensive Literature Review and Recommendations for Management (Dec. 2014), available at <http://winterwildlands.org/wp-content/uploads/2015/02/BMP-Report.pdf>