Bristlecone Chapter of the California Native Plant Society
PO Box 364, Bishop, CA 93515

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

Re: Over Snow Vehicle Use Designation Process

Dear Supervisor Lesley Yen,

We, the California Native Plant Society (CNPS) Bristlecone Chapter, are writing to express our comments and concerns regarding the Over Snow Vehicle Designation Process.

The California Native Plant Society, a non-profit environmental organization with over 12,500 members in 36 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices. Our local CNPS Bristlecone Chapter has members from Inyo and Mono counties, as well as throughout California and from countries across the globe. The attraction to these thousands of members is the vast and beautiful landscapes – montane and desert – where uniquely intriguing, diverse, and sensitive vegetation occurs.

We reviewed the Proposed Action Package regarding Over Snow Vehicle (OSV) use on the Inyo National Forest and appreciate the attention given to minimizing impacts to vegetation and sensitive areas. Aspects of the Proposed Actions we would like to see analyzed in more detail in the forthcoming Environmental Analysis include concerns related to snowfall adequacy and climate change, minimum snow depth, monitoring and adaptive management, and enforcement.

<u>Snowfall adequacy</u>
The method of determining snowfall adequacy is sensible given the varying terrain within the Inyo NF. However, given the rapidly changing environmental conditions due to global warming, we would like to see a discussion either in this section or elsewhere in the EA as to how climate change will reasonably impact the implementation of the proposed action. For instance, we may expect to continue seeing winter storms that bring adequate snowfall, but if 5-day periods are increasingly followed by melting temperatures over widespread areas, areas open to OSV use may need to be closed.

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Minimum snow depth

We agree that a minimum snow depth should be established to prevent negative impacts to natural resources and appreciate the discussion around the importance of snow density when calculating depth. It appears that the minimum depth of 12 inches (30 cm) has been commonly used in large part due to the results of Fassnacht et al. (2018) and possibly Hatchett and Eisen (2019). However, since shallower depths appear to negatively impact resources, we would like to see a discussion of whether it is feasible to estimate and enforce this depth (and appropriate density) across all OSV areas on the Inyo NF and analyze whether adding a 6 inch buffer or more would lead to increased resource protection during implementation. Furthermore, we would like to see an analysis of whether depths greater than 12 inches would significantly minimize impacts to sensitive resources identified in Appendix C, Table C3.

Monitoring and Adaptive Management

We support the prescription to monitor for soil disturbance, impacts to whitebark pine, and pumice flats. We would like to know if other monitoring will take place for other sensitive areas such as meadows, alkaline habitats, and whitebark pine populations in apparently lower use areas such as Glass Mountain. We would like to know how the status and conditions of these resources will be established in all areas to be monitored, and what a feasible monitoring program might look like for the Inyo NF (e.g., what locations, roughly how often, what season, etc.). Lastly, we would like to see a discussion of possible scenarios where monitoring may detect resource damage and what a reasonable response in management prescription might look like. Ideally, monitoring and adaptive management will allow the Inyo NF to minimize damages to resources under changes in use patterns, which may occur with the growing popularity of OSV recreation as well as the increased pressures of climate change.

Enforcement

It appears from Table D-6 that the majority of patrols and enforcement are targeted at minimizing conflicts between OSV users and other recreationists. Will patrolling officers also ensure OSV use adheres to rules aimed at minimizing damage to natural resources (e.g., minimum snow depths, setbacks, etc.)? Given the possibility for resource damage in areas of lower use, we would like to see occasional enforcement in these areas as well.

Thank you for considering these comments. Please keep us informed of any developments regarding this process.

Sincerely,

Kelly Bahr
CNPS Bristlecone Chapter, President

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References

Fassnacht, S. R., Heath, J. T., Venable, N. B. H., & Elder, K. J. (2018). Snowmobile impacts on snowpack physical and mechanical properties. The Cryosphere, 12(3), 1121–1135. https://doi.org/10.5194/tc-12-1121-2018

Hatchett, B. J., & Eisen, H. G. (2019). Brief Communication: Early season snowpack loss and implications for oversnow vehicle recreation travel planning. The Cryosphere, 13(1), 21–28. https://doi.org/10.5194/tc-13-21-2019