Data Submitted (UTC 11): 10/20/2023 12:24:26 AM
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Comments: Joint Scoping Comments by Winter Wildlands Alliance, Friends of the Inyo, CalWild, Sierra Club Range of Light Group and Snowlands Network (see attached pdf version for footnotes and appendices):

October 19, 2023

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

Dear Supervisor Yen,

We appreciate the opportunity to comment on the Inyo National Forest (INF) Over-Snow Vehicle (OSV) Use Designation scoping documents.

Winter Wildlands Alliance (WWA) is a national nonprofit organization representing the interests of human-powered winter recreationists across the U.S.-backcountry skiers, splitboarders, snowshoers, Nordic skiers, and many others seeking non-motorized wintertime experiences on public lands. Our mission is to inspire and empower people to protect America's wild snowscapes. Our alliance includes 34 grassroots groups in 16 states, including groups with a strong interest in the INF-Friends of the Inyo and Snowlands Network. Thousands of WWA members who live near and/or visit the Inyo National Forest each winter enjoy Nordic and backcountry skiing/splitboarding, snowshoeing, winter hiking and other non-motorized activities and experiences on the forest, and some also enjoy conscientious and responsible snowmobiling and other motorized activities where appropriate.

Friends of Inyo (FOI) is a public lands advocacy organization and 501(c)(3) working to protect and care for California's Eastern Sierra public lands and wildlife. FOI has approximately 1,000 members primarily residing in Mono and Inyo Counties, with many supporters who are also a part of the Eastern Sierra's large tourist population, all of whom empower FOI to represent them in the best protection of the unique natural resources of our working area.

CalWild is a statewide non-profit that works to protect and restore the state's wildest natural landscapes and watersheds on agency-managed lands, including those of the Inyo National Forest. In recent times, CalWild has engaged on the Comprehensive Wild and Scenic River Management Plans (CRMPs) for the Owens Headwaters and Cottonwood Creek; we were also heavily involved in the Land Management Plan revision process resulting in the INF's 2019 Land Management Plan.

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 who treasure our public lands, forests, and wildlife. Many Sierra Club members cross-country ski, snowshoe, hike, bike, and even snowmobile in winter on the Inyo National Forest.

Snowlands Network is an organization of 400 members who live in Northern California and Northern Nevada. Snowlands advocates for non-motorized backcountry winter recreation, including self-propelled skiing, snowshoeing, and snowplay. Snowlands' members often visit the Inyo National Forest in the winter season seeking opportunities for quiet recreation in non-motorized, conflict-free environments. Members of our

organization will be significantly affected by the Over Snow Vehicle Use Designation decision.

1.Introduction:

With eight years of direct engagement in Forest Service winter travel planning under the 2015 OSV rule on six other national forest units in California, as well as on numerous other national forests across the west, we believe that this process affords the INF an important opportunity to establish a thoughtful, balanced, holistic and equitable winter recreation management plan for decades to come. We understand that the focus and mandate of this process is the designation of appropriate areas and routes for motorized OSV use. And we see that the INF in its Proposed Action (PA) considers this project as "not intended to be a comprehensive, holistic winter recreation planning effort." However, if approached thoughtfully and with careful, thorough consideration of relevant factors and minimization criteria, the process of designating appropriate areas and routes for motorized winter recreation will also serve to delineate and protect separate areas that are accessible to the public for a wide range of quality non-motorized winter recreation opportunities, while also protecting natural soundscapes, natural resources, watersheds and climate-resilient ecosystems.

Unfortunately, the INF's initial PA seems to ignore this opportunity to achieve balanced and equitable winter recreation management on the forest, or to achieve the Desired Conditions as stated in the forest's 2019 Revised Land Management Plan which called for the provision of "Recreation opportunities [that] provide a high level of visitor satisfaction," and "a variety of motorized and non-motorized opportunities and recreation experiences."

The INF has instead proposed to designate the vast majority of the forest's snow-covered landscapes, routes and trailheads outside of wilderness areas open to motorized OSV use, including right to the edge of communities and neighborhoods on all sides, ignoring the specific concerns and expectations of the majority of the public in favor of a small minority of motorized recreationists. We expect that in the development of an Environmental Assessment (EA)-or, if required, an Environmental Impact Statement (EIS)-the INF will approach this process with diligence and intention, consider the whole range of public comment, present a range of thoughtful alternatives, and arrive at a more equitable winter recreation management plan that will benefit the whole public and also the landscapes, ecosystems and watersheds we all depend on for decades to come.

2.Over-Snow Vehicle Rule Background

In response to the growing use of dirt bikes, snowmobiles, all-terrain vehicles, and other off-road vehicles (ORVs) and corresponding environmental damage and conflicts with non-motorized users, Presidents Nixon and Carter issued Executive Orders 11644 and 11989 in 1972 and 1977, respectively. The executive orders require federal land management agencies to plan for ORV use to protect other resources and recreational uses. Specifically, the executive orders require that, when designating areas or trails available for ORV use, the agencies locate them to:

(1) minimize damage to soil, watershed, vegetation, and other resources of the public lands;
(2) minimize harassment of wildlife or significant disruption of wildlife habitats;
(3) minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands;
and
(4) minimize conflicts among different classes of motorized vehicle uses of National Forest System lands or neighboring federal lands.

Thirty-three years after President Nixon issued Executive Order 11644, the George W. Bush Administration, citing unmanaged recreation as one of the top four threats facing the national forests, published the Travel Management Rule in 2005. The rule codified the executive order "minimization criteria," but specifically exempted over-snow vehicles (OSVs) from the mandatory requirement to designate areas and trails in accordance with the

criteria. In 2010, WWA and 90 other organizations petitioned the U.S. Department of Agriculture to remove the OSV exemption from the 2005 Travel Management Rule. After this petition was denied, WWA successfully challenged the exemption in federal court. In the resulting 2013 decision, the court determined that Subpart C of the rule violated the mandatory executive order requirement that the Forest Service designate a system of areas and routes-based on the minimization criteria-where OSVs are permitted. The court directed the agency to issue a new rule consistent with the executive orders and the revised Subpart C was finalized in January 2015. Given this history, OSV travel planning is of significant interest to WWA and our partners.

Revised Subpart C of the Travel Management Rule-the OSV Rule- requires each national forest unit with adequate snowfall and designate and display on an OSV use map (OSVUM) a system of areas and routes where OSVs are permitted to travel; OSV use outside the designated system is prohibited. Thus, rather than allowing OSV use largely by default wherever that use is not specifically prohibited, the rule changes the paradigm to a "closed unless designated open" management regime and puts the onus on the Forest Service to justify OSV designations, rather than justifying why an area or route would be closed to OSV use. To support and inform designation decisions, forests must apply and implement the minimization criteria when designating each area and trail where OSV use is permitted. Any areas where cross-country OSV use is permitted must be "discrete, specifically delineated space[s] that [are] smaller . . . than a Ranger District" and located to minimize resource damage and conflicts with other recreational uses.

The 2015 OSV rule requires the agency to designate specific areas and routes for OSV use, and prohibits OSV use outside of the designated system. In other words, subpart C requires forests to make OSV designations under a consistent "closed unless designated open" approach and not to designate areas as open essentially by default. Consistent with the closed unless designated open approach, subpart C requires that any areas designated for cross-country OSV use be "discrete," "specifically delineated," and "smaller . . . than a ranger district." Accordingly, the Forest Service may not adopt decisions that fail to specifically delineate discrete areas where cross-country travel is permitted. Although not required by the OSV Rule, we also encourage the INF not to designate small, isolated parcels of land that lack public access or do not provide meaningful OSV opportunities. Again, OSV designations must be justified and not designated as open by default.

To satisfy the Forest Service's OSV designation obligations under the executive orders, the agency must apply a transparent and common-sense methodology for meaningful application of each minimization criterion to each area and trail. That methodology should, at a minimum: provide opportunities for public participation early in the process; incorporate site-specific data, the best available scientific information, and best management practices; account for site-specific and larger-scale impacts; account for projected climate change impacts, including reduced and less-reliable snowpack and increased vulnerability of wildlife and resources to OSV impacts; and account for available resources for monitoring and enforcement. Additionally, the INF must consider the "compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors." The work that the Inyo has already put into developing its scoping documents is a good start on this methodology and in these comments we will provide suggestions for how to build upon the work you and your staff have begun.

3.Compliance With Legal Minimization Criteria

The minimization criteria are the heart of any Forest Service travel planning process and we appreciate that the scoping materials include information about how the Forest has applied the minimization criteria to the routes and areas in the PA. We are supportive of the screening questions already developed by the INF, but also suggest the Forest include the following additional questions in this exercise, to better inform the analysis:

?Would OSV use in the area, including at the staging area, create air quality impacts that would be detrimental to forest visitors?

Motorized and non-motorized winter backcountry recreationists are often confined to the same plowed parking areas to prepare for their day on the forest. However, in these "staging areas" snowmobile emissions can be concentrated and lead to an additional source of conflict and potential health concerns. While technological advances have produced cleaner four-stroke engines (and even zero emission electric snowmobiles), the vast majority of snowmobiles still use two-stroke engine technology. In two-stroke engines lubricating oil is mixed with the fuel, and 20% to 30% of this mixture is emitted unburned into the air and snowpack. In addition, the combustion process itself is relatively inefficient and results in high emissions of air pollutants. As a result, two-stroke OSVs emit very large amounts of exhaust that includes carbon monoxide (CO), unburned hydrocarbons (HC) and other toxins. Carbon monoxide impacts the human body's ability to absorb oxygen, and thus OSV exhaust is particularly harmful to those who are engaging in aerobic exercise (skiing and snowshoeing).

In a study on the Medicine-Bow National Forest researchers documented a decline in air quality with increased snowmobile activity. They measured higher ambient concentrations of CO2, NOx, NO, and NO2 at a snowmobile staging site and found significantly higher concentrations of these air pollutants on days with significantly more snowmobile activity. The researchers concluded that snowmobile exhaust was degrading local air quality.

Concerns over human health related to snowmobile emissions have led to extensive research on snowmobile pollution in Yellowstone National Park, and conclusions from these studies have led to a ban of older technology two-stroke engines from the Park. Emissions from OSVs emit many carcinogens and can pose dangers to human health. Several "known" or "probable" carcinogens are emitted including nitrogen oxides, carbon monoxide, ozone, aldehydes, butadiene, benzenes, and polycyclic aromatic hydrocarbons (PAH). Particulate matter, also found in OSV exhaust, is detrimental in fine and coarse forms as it accumulates in the respiratory system and can lead to decreased lung function, respiratory disease and even death. While these pollutants are more concentrated at OSV staging areas and parking lots, OSV exhaust on trails can linger for long periods of time and dramatically reduce the quality of the experiences of non-motorized users along the trail. This is an example of a specific conflict between uses that the INF is required to minimize in its designation of areas and routes for OSV use.

Due to concerns with air pollution, particularly at OSV staging areas or where OSV use is concentrated, in addition to screening for air pollution impacts as part of the minimization criteria exercise, we recommend separating motorized and non-motorized winter recreationists to the extent possible. Separate parking lots for motorized and non-motorized users in popular recreation areas can help skiers and snowshoers limit their exposure to snowmobile exhaust and thereby minimize conflicts between uses. Separating parking areas will also help to relieve congestion as snowmobile trailers take up considerably more space than passenger cars and trucks, often leaving little or no room for non-motorized users to park at trailheads.

?Would noise from OSVs in this area/along this trail be audible from adjacent non-motorized areas?
Or
How far would OSV noise from this area or trail travel on a typical winter day?
And
Would sound, emissions, or other factors from OSV use of the area or trail be
compatible with the nearby populated area, neighborhood, or community or private land?

The Forest Service has previously recognized that OSV use creates noise that has the potential to impact wildlife and other recreation uses, therefore it is important to analyze this impact. For example, in the Stanislaus National Forest's OSV designation EIS, the Forest Service considered, by Alternative, the total acres of NFS lands designated for OSV use, and therefore potentially affected by noise, and the acres of Forest Service lands where noise is predicted to increase above ambient levels in sensitive areas (non-motorized recreation areas, communities, wildlife habitat) by 5 or more decibels as a result of moderate to high OSV use levels.

Other national forests in Region 5 have conducted noise analyses as part of their OSV designation processes to understand the noise impacts of potential designations. Using the SPreAD-GIS model and average environmental factors for the winter season, the Forest Service modeled sound propagation away from point source sound locations along OSV trails and are located near non-motorized areas or trails. While this modeling exercise does not perfectly capture noise impacts, it provided the Forest Service with at least some understanding of noise impacts resulting from potential OSV designations. Because most OSV use in Region 5 occurs along groomed trails, Region 5 forests chose to focus this modeling on trails. The INF may want to consider also applying this modeling to popular OSV play areas.

?Is there a potential for conflicts between OSV use and other existing or proposed recreational uses to occur and/or are conflicts already known to be occurring?

Motorized and non-motorized winter recreationists often seek out the same settings and look for similar experiences such as untracked or well-groomed snow, fun, and the enjoyment of the natural beauty of the mountains. But as winter recreation grows on Forest Service lands, so does the potential for impacts on natural resources and conflicts between these two user groups. In terms of recreation opportunity, OSV use adversely impacts the recreation experience sought by many non-motorized users, and high levels of motorized recreation can displace non-motorized use, while the reverse is rarely true. This is a phenomenon that has been well documented in Forest Service literature and analyses. Where displacement does not occur because of the high level of demand for a particular area or a lower density of OSV use, conflicts among uses may still be present and can be substantial. Additionally, advancements in technology and changes in use patterns among both user groups have increased the need for proactive management. While early snowmobiles were relatively slow and generally limited to groomed trails, today's OSVs can go almost anywhere a skier can go. New technologies, combined with growing numbers of people in the backcountry have led to increased use conflict. For more information on use conflict, and minimization approaches, please see Appendix 1: Use Conflict in OSV Planning.

Other national forests in Region 5 have identified several ways in which OSVs can impact the quantity and quality of non-motorized winter recreation opportunities for those seeking solitude and challenging physical experiences. These included: designating OSV use in popular, highly desirable, non-motorized recreation areas; not preserving areas that are easily accessed by communities and visitors for winter non-motorized recreation opportunities; reducing the quantity of national forest lands available for quiet, non-motorized recreation; and increasing the distance of travel required in order to access desirable quiet, non-motorized recreation areas (perhaps to distances further than an enthusiast is physically able to travel).

In turn, the Forest Service has stated that OSV designations can lead to conflict between OSV and non-motorized winter recreation by: increasing the area of overlap between non-motorized (e.g., snowshoeing, cross-country skiing, general snow-play) and motorized (i.e., OSV) use; designating non-motorized areas for motorized OSV use; OSVs consuming untracked powder desired by non-motorized winter recreationists, particularly cross-country skiers, snowshoers, and backcountry downhill skiers; OSVs compacting, tracking, and rutting the snow, making the snow surface difficult to cross-country ski, snowshoe, or walk on; OSVs creating concerns for non-motorized winter recreationists' safety where winter recreation trails and areas are shared with OSV usage; OSVs creating noise impacts that intrude on the solitude and/or natural soundscapes these enthusiasts seek; OSVs creating local air quality impacts that intrude on the unpolluted air and solitude these enthusiasts seek; OSVs creating visual impacts that intrude on the unaltered scenery these enthusiasts seek; OSVs impacting the quiet characteristics of non-motorized trails; and OSVs impacting the Natural, Undeveloped, Outstanding opportunities for solitude or primitive and unconfined recreation in Wilderness Areas.

Furthermore, the EA should consider whether to designate areas or trails by class of vehicle and include analysis of potential environmental effects from the use of the different vehicle classes (for example traditional snowmobiles versus OSVs over 50 inches wide or exerting over 1.5 pounds per square inch (psi)). The Tahoe National Forest used this type of analysis and differentiated between Class 1 and Class 2 OSVs, with Class 2

OSVs only allowed on designated groomed trails. As defined by the Tahoe, Class 1 OSVs include those that typically exert a ground pressure of 1.5 psi or less while Class 2 OSVs typically exert a ground pressure of more than 1.5 psi.

It's also important to differentiate between mitigation and minimization, as mitigating impacts is not equivalent to minimizing impacts. Federal courts including the Ninth Circuit Court of Appeals have repeatedly affirmed the substantive nature of the agency's obligation to meaningfully apply and implement the minimization criteria. Efforts to mitigate impacts associated with a designated OSV system are insufficient to fully satisfy the duty to minimize impacts, as specified in the executive orders. See Exec. Order 11644, § 3(a) ("Areas and trails shall be located to minimize" impacts and conflicts.). Thus, application of the minimization criteria should be approached in two steps: first, the agency locates areas and routes to minimize impacts, and second, the agency establishes site-specific management actions to further reduce impacts.
4.Compliance with Area Size Requirement

The 2015 OSV Rule requires that areas designated for cross-country OSV travel be limited in size to no more than the size of a ranger district and that these areas be discrete and specifically delineated. The term discrete is generally accepted to mean "apart or detached from others; separate; distinct."

The PA specifies sixteen specifically delineated areas that would be designated for OSV cross-country travel and claims on page 27 that each of these areas is less than the area of a ranger district. However, these areas are not all discrete and are contiguous to each other and must be considered a single, designated area in the context of the OSV Rule. The Lee Vining, June Lake Loop, Mammoth to June West, Sherwin to Laurel, McGee, and Rock Creek areas defined in the PA form a contiguous area west of Highway 395. Together, this area comprises 91,100 acres. Similarly, the Mono Craters, Glass Mountains, Mammoth to June East, and Crowley Basin areas form a contiguous area east of Highway 395, which is 155,400 acres in size.

Each of these combined areas is less than the size of the smallest ranger district, so the PA does comply with the TMR in this respect. However, the area size requirement must be evaluated correctly based on the contiguous areas that will be designated in the final use map and not on the arbitrarily specified areas shown on maps as part of the environmental analysis.

5.Climate Change

The Forest Service must plan for OSV management in the context of a rapidly changing climate and address how changing winter seasons and snow packs, more intense storms, and more rain-on-snow events affect winter recreation. These climate-driven changes are already altering winter backcountry recreation use patterns and this trend is expected to continue.

With fewer or smaller areas available for over-snow recreation, these uses will become more concentrated, which may lead to increased crowding, use conflict, new or increased wildlife impacts, and resource damage. For example, not only will there be fewer places with persistent snow cover, access to these areas may change or require travel on non-snow surfaces. Climate change is also altering wildlife behavior, sensitivity, migration patterns and habitat use. To preserve quality recreation opportunities, protect wildlife, and minimize natural resource damage, the Forest Service should consider the impacts of a changing climate and how the winter landscape may change over the life of the OSV plan. The INF should also address how it will manage shoulder-season OSV use to ensure OSVs are traveling on sufficient snow to protect underlying soils and vegetation. The shoulder seasons-late fall and early spring-can be a time of frequent and abrupt change in the mountains, with snow accumulating and melting quickly and snow cover changing daily. Snow accumulation is not an altogether steady process-an early storm may blanket the landscape with snow, only to have it all melt away before "real" winter sets in. Likewise, the spring melt doesn't follow a smooth trend. Spring storms and unseasonably warm days can drastically change snowpacks, especially at lower elevations. Season dates can help to minimize

impacts to natural resources, along with protecting sensitive and migratory wildlife, so long as they're enforced.

6.Wildlife and Vegetation

Wildlife
Over Snow Vehicles can cause mortality, habitat loss, and harassment of wildlife. While most animals are well adapted to survival in winter conditions, the season creates added stress to wildlife due to harsher climate and limited foraging opportunities. Deep snow can increase the metabolic cost of winter movements in ungulates up to five times normal levels at a time when they are particularly stressed by forage scarcity and high metabolic demands. Disturbance and stress to wildlife from snowmobile activities during this highly vulnerable time is dire. Studies of observable wildlife responses to snowmobiles have documented elevated heart rates, elevated glucocoritcoid stress levels, increased flight distance, habitat fragmentation as well as community and population disturbance.

In addition to the direct physiological stress of snowmobiles, evidence suggests that popular winter trails can fragment habitat and wildlife populations. Winter trails through surrounding wilderness areas or other core areas create more "edge effect" (the negative influence of the periphery of a habitat on the interior conditions of a habitat) and thereby marginalize the vitality of some species.

In many instances, snowmobiles induce animal flight, causing increased energy expenditures. In Yellowstone National Park, where snowmobile-wildlife interactions have been most extensively studied, evasive maneuvers in response to snowmobiles have been documented in a number of species. These maneuvers result in increased energy expenditures for the affected wildlife. For example, Aune (1981) reported flight distances of 33.8 meters for elk and 28.6 meters for mule deer in response to snowmobiles in Yellowstone. The energy cost estimates calculated for these impacts were 4.9 to 36.0 kcal in elk and 2.0 to 14.7 kcal in mule deer per disturbance. These energy expenditures are roughly equivalent to the necessary additional consumption of 4.3 - 31.7 grams of dry forage matter by elk and 1.8 - 12.9 grams by mule deer each time a disturbance occurs. Severinghaus and Tullar (1978) theorize that for white-tailed deer, during a 20-week winter with snowmobile harassment each weekend, "food enough for 40 days of normal living would be wasted just escaping from snowmobiles."

There are several wildlife species on the INF that merit consideration during this OSV planning process, including but not limited to Sierra Nevada bighorn sheep, mule deer, Sierra Nevada red fox, wolves, wolverine, southern Sierra Nevada fishers, and Bi-State sage-grouse. OSV use can be particularly harmful to ungulates, as these species are most vulnerable during winter. Ungulate winter ranges should not be designated for cross-country OSV use, and any routes designated within winter ranges should be carefully considered, with the minimum number of miles necessary to provide quick passage through these sensitive areas. Mule deer over-winter at lower elevations, making cross-country OSV contact likely under the current proposal. Likewise, migration corridors should be protected from OSV use, as these corridors are essential to population health and survival.

Sierra Nevada red fox (SNRF) are classified as a Threatened Species in California and a Region 5 Sensitive Species. The species is found at or around 6,500 feet in elevation and prefers areas with forest cover. They avoid open areas and dense forests. Recent sightings have been concentrated in high elevation areas near Lassen Peak and Sonora Pass but the extent of their current distribution is unknown and it's entirely possible that SNRF currently are present on the INF. We encourage the Forest Service to work closely with the California Department of Fish and Wildlife to identify and minimize potential impacts to SNRF and other species.

Our most pressing concern with SNRF in regards to OSV use is in how OSVs may tip the competitive balance between coyotes and SNRF. Snow compacted by OSVs can become travel corridors that facilitate coyote incursion into red fox habitat. There are several studies in other areas that show coyotes heavily utilize snowmobile tracks move into areas that are normally the domain of species better adapted to deep snows, such as lynx.? Although it is likely that red foxes also exploit snowmobile tracks opportunistically, we are concerned

that snowmobiles tip the competitive equation more in favor of coyotes. Coyotes and foxes utilize the same food resources and coyotes are known to prey on fox as well.?Without snowmobiles packing down trails, the lighter red foxes may have just enough of an edge to coexist with the otherwise dominant competitor in lean winter times.

Just this past summer a wolverine was detected on the INF for the first time in over a century. This remarkable species is well adapted to winter landscapes, but also very sensitive to human disturbance, particularly from winter recreation. It is also a Region 5 Sensitive Species. In general, to minimize impacts to wolverines the Forest Service should not expand the winter recreation footprint within wolverine habitat, restrict off-trail OSV use in denning habitat from February through April, and increase connectivity. In 2020 Winter Wildlands Alliance and the Yellowstone to Yukon Conservation Initiative published recommendations for winter travel planning in wolverine habitat, based on Heinemeyer 2019 and other research on how wolverines respond to winter recreation. These recommendations are to:

?Limit the spread of winter recreation in wolverine habitat. In high quality wolverine habitat where winter recreation use is already established, buffer recreation areas with closures to prevent recreation spread. Additionally, areas of moderate-to-high wolverine habitat that do not currently see high levels of winter recreation activity should be protected with closures to provide refuge for wolverines.
?Manage for low recreation intensity in wolverine habitat. In addition to limiting the spread of winter recreation, manage areas that currently experience low-moderate winter recreation so use does not increase. This could be achieved by limiting winter parking opportunities or requiring (and limiting) recreation use permits.
?Establish seasonal (February - April) closures to protect female wolverine habitat during the denning season. Importantly, closures should extend beyond denning habitat, as females need secure foraging habitat to successfully rear kits. Work with biologists to identify known female wolverine locations and establish closures in areas large enough to secure denning habitat and where foraging needs can be met. around where each female is located. While each situation will be different, the closure area should be based on best available science (analysis is currently ongoing on the best recommended area size to support denning and foraging habitat), and should be in consultation with local and regional biologists who can provide insight into foraging challenges and opportunities.
?Identify opportunities to improve wolverine habitat connectivity through winter recreation management by reducing disturbance along corridors that connect high-value habitats. These steps could include requiring and limiting recreation use permits, designating recreational use within linear corridors, and closing use during the denning season.
?Where demonstrated as necessary to provide access to high-value recreation resources or connectivity between communities, consider designating some linear winter recreation routes through areas that are otherwise closed.

Like wolverines and Sierra Nevada red fox, gray wolves are rare but, with the recent re-establishment of a pack on the adjacent Sequoia National Forest, are potentially present or could be present in the future on the INF and must be considered in the analysis for this project.

It's also important that the INF consider and minimize impacts to bird species, from year-round residents such as Bi-State sage-grouse (BSSG) and various raptor species, to migratory songbirds. Noise from OSVs can be especially detrimental to birds during the breeding season, when many species rely on auditory communication to find mates. Anthropogenic noise, particularly that from motor vehicles, has been shown to alter bird behavior. Snowmachine use has been demonstrated to alter the behavior of many birds that commonly inhabit snowy landscapes as the frequency and range of sounds emitted from snowmachines overlaps with their vocalizations. In a 2018 study on the Stanislaus National Forest, scientists documented that the listening area for white-breasted nuthatches was reduced by more than 90 percent within the snowmobile noise footprint zone, preventing intraspecific communication across a large area.

BSSG alter their wintering habits based on conditions. In a heavy snowpack year, they will move, as they did this past winter, to where the sagebrush is tallest and sticks out of the snow. In a lighter snowpack year, they might be in their usual locations. They roost in the snow and let the snow cover themselves and then shake the snow off when the storm passes. The mating/lekking season is generally February-March. They nest in April-June and 95% of the nests are within 3.2 miles of the lek according to the 2012 BSSG Action Plan. The OSV plan should conform to the 2012 BSSG Action Plan and the LAWG's recommended protections. Off-trail snowmobiling in BSSG lekking areas should not be allowed

Whitebark pine
On December 15, 2022, the U.S. Fish and Wildlife Service published a final rule (87 FR 76882) to list the whitebark pine (Pinus albicaulis) as a threatened species under the Endangered Species Act. In our extensive experience backcountry skiing in whitebark pine habitat, we have seen whitebark saplings present above the snow even midwinter in areas with deep snowpacks. This is especially true near ridgelines or other wind-blown areas where the snow is shallower than surrounding areas such as near and along the crest of the Sherwins Range. We have frequently observed OSV damage to whitebark pine in such areas. As Forest Service timber managers know, snowmobile damage to trees is common. Gallatin National Forest survey data obtained in a 2008 FOIA request show that between 1983 and 1995, snowmobiles damaged between 12 and 720 trees per acre across approximately 72,393 surveyed acres. Considering damage from OSV use can prevent whitebark pine saplings from reaching seed-bearing maturity, this is a serious issue for the future of the whitebark population. Furthermore, because whitebark pine grow in relatively low densities compared to other tree species, each individual sapling is critical to the persistence of a stand. In addition to more carefully considering how to protect whitebark pine from OSV-caused damage, the Inyo OSV plan should include a monitoring plan so that the Forest Service can accurately assess whether OSV use is cause for concern or not. The monitoring plan should include meaningful measures for assessing compliance with and effectiveness of the OSV plan, including but not limited to Threatened and Endangered species.

Regardless of the species of topic, the Forest Service may not rely on potential future mitigation measures, hypothetical future monitoring, and other generalized statements to demonstrate compliance with the minimization criteria. While identifying potential impacts for future adaptive management actions and mitigation measures is an important part of the overall effort to designate a motorized system that minimizes impacts, it does not satisfy the obligation to apply relevant data to locate areas and trails to minimize impacts in the first instance.

7.Data and Ground Truthing

It is critical that this OSV plan be grounded in real data. Fortunately for the INF, winter recreation data for the forest-collected by the agency and by partners-abounds. Nationally, and in California, non-resort winter recreation is booming and according to the Snowsports Industries Association and International Snowmobile Manufacturers Association annual reports, participation in non-motorized, non-resort winter recreation activities consistently outnumbers snowmachine use by orders of magnitude. The INF's own NVUM data shows that the percent of visitor participation in snowmobiling was just 0.3% in 2016 (the most recent report)- the lowest of any activity on the forest. There are well over 100 backcountry skiers/splitboarders, Nordic skiers, snowshoers and snowman builders to every one snowmobiler, and yet the interests and concerns of the former seem not to be considered at all in the INF's PA.

Last winter WWA worked with Friends of the Inyo and local volunteers to monitor winter recreation use on the INF. We conducted 80 visitor use assessments on the Inyo throughout the winter season. The details of our data collection efforts on the Inyo are contained within the attached 2022-2023 California Winter Recreation Data Collection Program report (Appendix 3). We plan to continue this effort throughout the upcoming winter season and beyond, and look forward to continuing communication with the INF regarding objective results and observations, as well as specific queries that could help inform the winter travel planning process.

We are glad to see the INF working with local cooperating agencies such as the Town of Mammoth Lakes and Mono County. We hope to see the incorporation and analysis of detailed recreation use and visitor monitoring data from these and other agencies in the INFs development of alternatives and application of minimization criteria.

Guidebooks are also an important source of data and localized topographical expertise to inform the OSV planning process. Dan Mingori and Nate Greenberg's Backcountry Skiing: California's Eastern Sierra Guidebook describes in detail many of the areas and routes utilized by the backcountry ski and splitboard community. Ski Tours in the Sierra Nevada - East of the Sierra Crest, by Marcus Libkind, is another excellent resource. In addition to guidebooks, we encourage the INF to look to mobile apps such as OnX Backcountry, OnX Off-Road, and Strava to understand how and where winter visitors are recreating on the Inyo. Finally, we hope that INF line officers and the planning team will spend time on the ground and in the field during the winter season to monitor winter use patterns first-hand as well as to gauge visitor satisfaction and the actual and potential conflict between uses under current management scenarios.

This OSV plan is the Inyo's primary opportunity to set the vision for the future of motorized use and access on the forest for the next 10-30 years, and as such it's important that the EA and the planning process be proactive and forward-looking. Recreation technologies are rapidly changing, with new motorized over-snow uses emerging each year. We encourage the INF to look to and learn from other winter recreation forests as another source of data and potential management solutions as you proceed with this process.

8.Equity

Executive Order 13985, "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government," requires federal agencies to prepare a plan for addressing any barriers to full and equal participation in programs, services, procurement, contracting, and other funding opportunities. In response to this order, the Forest Service published an Equity Action Plan in 2022, with a new plan recently published for 2023-2024. Action number 8 in this plan is to "Promote Access to Recreation and Outdoor Experiences in Underserved Communities." This must include reducing barriers to and increasing equitable access for communities to natural soundscapes, snowscapes, and quality non-motorized recreation opportunities in winter. The OSV plan is an important path to accomplishing this for communities in the Eastern Sierra, in addition to promoting/providing equitable motorized access.

9.Recommended Alternatives

Between late September and late December 2022, representatives from a variety of entities met in a series of facilitated meetings and limited site visits to discuss possible stakeholder-based pre-scoping recommendations for OSV designation and management on the INF. Unfortunately, representation in this process skewed heavily-numerically-toward groups and individuals with specific interests in motorized winter recreation rather than the interests of the majority of forest users. While there was some productive discussion and even some tentative verbal agreement on a number of points-such as, generally, a preference for separating incompatible uses wherever possible-this so-called "Collaborative Alternative Team" (CAT) failed to reach any definitive, written compromises or solutions. With the exception of a general initial proposal for the minimization of use conflict at Shady Rest Park, none of the compromises or proposals discussed during this pre-scoping process seem to have been incorporated into the INF's PA.

We understand that the INF's PA is merely a starting point and that the planning team will be developing a number of specific alternatives over the coming year to be considered and analyzed according to the specific minimization criteria. To that end, by way of illustration, we are including here a list of some of the geographical areas that were discussed during the pre-scoping process and/or are of specific concern to our members and

partners, with the expectation that the INF will duly analyze and consider a reasonable range of alternatives for each. This list is by no means meant to be comprehensive or exhaustive, and we expect the INF team to do its own topographical ground-truthing, as well as monitoring and assessment of seasonal visitor use patterns and trends in order to develop alternatives that truly meet minimization criteria and are understandable and enforceable on the ground.

Roughly from north to south:

?Lundy Canyon: We understand that the roadway into the canyon along Mill Creek and Lundy Lake, from its winter closure, is occasionally used by OSVs for day tours and access to the Wilderness boundary. We expect to see an alternative that analyzes designating this roadway for appropriate OSV use. Designating the steep sides of the main canyon as open OSV riding areas makes no sense on the ground. Designating OSV travel along the cherry stem into Lake Canyon, along a route that is designated non-motorized in summer, would invite trespass into the Hoover Wilderness and significantly impact the wilderness character of the entire canyon.
?Tioga/Saddlebag: Given the sensitivity of this landscape, its contiguity with Yosemite National Park, the Harvey Monroe Hall Research Natural Area and the Hoover Wilderness, and its world-renowned popularity as a human-powered Nordic touring, backcountry skiing and snowboard zone, especially in spring, plus the significant avalanche danger on the Tioga Road throughout the season, we do not see the rationale for designating this area open to motorized OSV use. We also look forward to seeing thorough consultation between the INF and Fish and Wildlife, Southern California Edison, CalTrans, Mono County, the National Park Service and other cooperating agencies on how best to protect and manage this zone.
?Lee Vining Canyon: Given the steep terrain on either side of the Poole Power Plant Road, and the canyon's popularity as an access corridor for backcountry skiing on the flanks of the Dana Plateau, we do not see the rationale for opening either the roadway or the surrounding terrain to OSV use.
?Parker Bench: Given the limited and complex terrain between State Route 158 (the June Lake Loop) and the wilderness boundary, and the zone's popularity for access to numerous backcountry skiing, snowboarding and winter mountaineering routes on Mount Wood and Mount Lewis, we do not see the rationale for designating this zone open to OSV use. It must also be considered that there are BSSG leks in this area. There have been 3 translocations of sage grouse to the Parker Meadow and a small population is getting re-established here.
?Obsidian Dome Nordic Area and Trailhead: As we understand it, this small area was established as a non-motorized Nordic ski area by community consensus and by Forest Order in the early 1990's. It is the only such area accessible within a short drive of the communities of June Lake and Lee Vining. It is also a popular access zone for backcountry skiing and snowboarding on Chicken Wing. We do not see the rationale for diminishing this historic protection by designating any of this area open to OSV use. Furthermore, many of our members and partners have reported increasing motorized trespass into this area in recent years, and we have provided the INF with specific documentation of several instances of such trespass during the 2022-23 winter season (see RIMS data report, Appendix 3). We look forward to seeing specific implementation strategies as part of the INF's final OSV plan, to include a combination of signage, education, monitoring and enforcement as means of minimizing conflict between uses. We also look forward to the INF's development and analysis of different alternatives for effectively separating uses in this area, as the current multi-use parking and staging scenario tends to maximize rather than minimize conflict between uses (with motorized OSV users having to cross through the non-motorized parking and trailhead in order to join-at difficult right angles-the groomed OSV network). Such an alternative should also include not designating OSV use at the existing family snowplay area on the west side of Highway 395 at FS Road 2S11A.
?Upper Deadman Creek cherry-stem: as with the cherry stem in Lake Canyon described above, designating OSV travel into this narrow canyon would invite trespass into the Owens River Headwaters Wilderness and significantly impact the wilderness character of the entire canyon.
?Earthquake Dome: The north and east flanks of Earthquake Dome are a popular local backcountry ski and snowboard zone. We do not see the rationale for shrinking protections in this zone by expanding the area designated open for cross-country OSV use. We also look forward to seeing an alternative that does not designate the area around the historic Sierra Club blue-diamond Nordic touring and snowshoeing trail open to

cross-country OSV use.
?Scenic Loop dispersed camping and family snowplay zone: We can see the need to provide a designated OSV route through this zone to access the groomed OSV network beyond, but we look forward to seeing an alternative that does not designate cross-country OSV use that would conflict with the popular family snowplay and dispersed camping zone on the east side of the Mammoth Scenic Loop. We anticipate seeing an alternative that analyzes designation of an OSV staging area at the intersection of the Inyo Craters Road.
?Shady Rest Trailheads and trail re-alignments: We generally support the alternative being developed by the Inyo NF and the Town of Mammoth Lakes (TOML) to separate motorized and non-motorized winter recreation in the Shady Rest area. This new proposed scenario should allow for dedicated motorized staging at the New Shady Rest Campground dump station at the corner of CA203 and Sawmill Cutoff Road, with a designated re-alignment of a groomed OSV route around the west side of Shady Rest Park along the existing multi-use pathway for direct groomed access to the groomed snowmobile trail network to the north of Shady Rest Park. The town's groomed Nordic ski and walking loops, accessible from the Welcome Center parking lot, as well as Shady Rest Park itself, should not be designated open to motorized over-snow use. This would minimize conflict between incompatible uses at one of the town's most popular winter recreation access points, and would be a huge improvement for all users over the current situation.
?Earthquake Fault: We would like to see an alternative that does not designate motorized OSV use in the Earthquake Fault area, thereby creating an opportunity for a dedicated, higher-altitude (climate resilient) non-motorized staging area for Nordic skiing, snowshoeing, family snowplay and backcountry ski/snowboard access to the east and north sides of Earthquake Dome and to the Sierra Club's historic blue diamond Nordic trail. As necessary, a snowmobile crossing could be established across the roadway below the parking area to provide OSV access to the Cinder Shed and the groomed OSV network beyond.
?Cinder Shed: We can see the value in establishing a sustainable higher-elevation motorized staging area here for more predictable seasonal access to the broader groomed OSV network.
?Minaret Vista: We would like to see alternatives developed and analyzed in conjunction with INF's analysis of the proposed Mammoth Mountain Main Lodge Redevelopment Project. Alternatives should seek to delineate separate motorized and non-motorized access routes to Minaret Summit and the popular Minaret Vista overlook. The INF should show its rationale for designating cross-country OSV use along San Joaquin Ridge above Minaret Vista.
?Agnew Meadows, Reds Meadow and Devils Postpile: The INF should show its rationale for designating cross-country OSV use beyond Minaret Summit into the Reds Meadow area and how it plans to enforce against motorized trespass into Devils Postpile NM and the Ansel Adams and John Muir Wilderness areas.
?Mammoth Lakes municipal boundary: Generally, in order to provide equitable access to natural soundscapes and non-motorized recreation opportunities, to minimize conflicts between uses and impacts to populated areas, the forest should develop and analyze alternatives that designate discrete OSV routes that move OSVs at low speeds to areas and routes well beyond communities and neighborhoods, where impacts to other uses and to populated areas are minimized.
?Mammoth Lakes Basin: Given the inherent conflict between motorized OSV use and all the other highly popular non-motorized uses in the Lakes Basin, we look forward to seeing the rationale for designating this area open to OSV use beginning on April 17-beyond merely that it may have been managed this way in the past. If there is indeed adequate rationale for designating OSV travel within the Lakes Basin beginning on April 17, it should be limited to existing roadways and not allowed right to the edge of the wilderness boundary. It should be noted that, according to the Mammoth Lakes Trail System website, current management is as follows: "On April 17 of each year, after the cross-country ski season ends and before roads are plowed, snowmobiles are allowed in the Lakes Basin on existing roadways only, conditions permitting."
?Sherwins Front and Sherwins Meadow: The Sherwins Front-from Mill City, the Consolidated Mine and Mammoth Rock to Bardini Ridge and the Tele Bowls-is a renowned, world-class, frontcountry human-powered ski and snowboard area right at the edge of (and easily accessed from) the heart of Mammoth Lakes. Historically known as Sherwins Bowl, the area was first proposed for development as a commercial ski area in the 1950s and was formally designated for study as a winter sports site in 1967. In 1991, the Forest Service rejected a proposal to develop a lift-served commercial ski resort in this area, in part due to overwhelming opposition from

the community and what was then the California Department of Fish and Game (now Department of Fish and Wildlife). The Sherwins Meadow is a popular and easily-accessible area for walking, Nordic skiing, snowshoeing and family snowplay along the base of the mountains and bounded to the north by the Snowcreek Development and Old Mammoth neighborhoods. The mountains and meadow are generally managed as non-motorized in summer-with singletrack trails open to equestrians, hikers and mountain bikers but not e-bikes, dirt bikes or ATV/UTVs-and were recommended to be non-motorized in winter in the community-developed Sherwins Area Recreation Plan (SHARP) as adopted by the Town of Mammoth Lakes in 2009. The Sherwins were classified as having High Scenic Integrity Objectives in the 2019 Revised Land Management Plan and were also classed on the Recreation Opportunity Spectrum (ROS) as "semi-primitive non-motorized." As with the Shady Rest proposal above, we hope to see the development of an alternative that would not designate any of the Sherwins area for motorized OSV use. This would protect the meadow and the popular backcountry ski and snowboard zones and uphill tracks for accessible quiet, non-motorized recreation and natural soundscapes, and would minimize safety concerns and conflict between incompatible uses. There is plenty of space at the propane tanks and borrow pit parking areas (with a new Sherwins Trailhead to be developed here) to create a simple, strategic separation between non-motorized and motorized staging. This would allow for direct OSV access to thousands of acres of cross-country snowmobiling to the south and east by way of a designated OSV trail that follows Sherwin Creek Road to the motocross area and beyond (rather than straight through the walking and sledding area and over the south-facing slopes and manzanita across from the Tele Bowls), effectively minimizing conflict between incompatible uses, creating a comfortable and welcoming non-motorized staging area for equitable access to the Sherwins and Sherwins Meadow, and allowing for a range of different winter recreation experiences for all people.

?Solitude Canyon: Just three years ago, in November 2020, then Mammoth District Ranger Gordon Martin rejected a proposal to build a sustainable non-motorized trail in Solitude Canyon, citing "Issues raised by the public, state agencies, and U.S. Forest Service staff as part of the NEPA scoping process [including]: concerns that this project has the potential to affect important migration corridors relied upon by the Round Valley mule deer herd; [and] that Solitude Canyon provides a greater value as a natural and informal dispersed use area." We look forward to seeing the INF's rationale for designating this Inventoried Roadless Area open to cross-country OSV use when it has already deemed a non-motorized trail to be too impactful.

?Long Valley: There are BSSG leks in the Laurel Ponds/Sherwin Creek area as well as in the area to the east of the Mammoth airport. There are about 30 leks in the area from the Upper Owens River to the foot of the Glass Mountains and from the Green Church to Crowley Lake. This whole area is a nesting zone for the South Mono Population Management Unit (PMU), which is the second largest sub-population unit and a core BSSG area. It is an important PMU to protect or the species will be listed. (The species currently has a USFWS candidate listing as threatened and so must be treated as listed until the review deems otherwise; all BSSG PMUs should be seasonally closed per the latest updated BSSG plan.) We look forward to a thorough analysis and consultation with federal and state wildlife agencies, USGS, USFS biologists and the Local Area Working Group with regard to how cross-country snowmobiling in this area would impact this sensitive species.

?Convict Lake: We understand that the Tobacco Flat area above Convict Lake to the south has historically provided cross-country OSV use opportunities and access to the McGee Crest, but we do not see the rationale for designating OSV use right to the edge of Convict Lake, where the plowed parking area along the lakeshore provides one of the few dedicated public-access non-motorized trailheads on the northern part of the INF, and where the terrain is clearly unsuitable for motorized use.

?Rock Creek: Given the popularity of the upper canyon for Nordic touring, walking, snowshoeing and backcountry ski/snowboard access, and the close proximity of wilderness on either side, we do not see the rationale for designating open OSV areas above the Sno Park. The steep terrain and dense vegetation on either side of the road in the lower part of upper Rock Creek Canyon seem to us to make no sense for cross-country OSV use. We look forward to seeing the rationale for this proposed designation.

?Southern INF: Perhaps we misunderstand the maps provided with the INF's PA, but we do not see the rationale and are deeply concerned if indeed the INF is proposing to designate motorized OSV routes on cherry-stemmed roadways into the John Muir Wilderness at Onion Valley, Whitney Portal, Tuttle Creek and Horseshoe Meadows. This would obviously invite wilderness trespass and greatly impact wilderness character in these zones.

10.Implementation

Once the plan is finalized, the Forest Service must develop educational resources that will help the public understand and comply with the new travel plan, ideally with buy-in and assistance from local partner organizations. These may include winter recreation maps and apps (pairing OSVUM data with additional information about responsible recreation and opportunities for all forms of winter recreation in the region), trailhead and trail signage, backcountry ambassador and snow ranger programs. We encourage the Forest Service to consider developing an implementation plan congruent with the OSV planning process. Both the White River and Gallatin National Forests created implementation plans shortly after finalizing their respective OSV plans and both provide good examples for an implementation plan. Meanwhile, neither the Lassen nor Stanislaus have implementation plans, nor appear to have given much thought to implementation during the OSV planning process, and both are now struggling to engage and educate the public or otherwise implement their new OSV plans. For example, the Lassen OSVUM was not publicly available last winter season and few visitors were aware of the new OSV designations, nor did the forest take steps to enforce the new plan. This is a frustrating situation for the many people and organizations who have engaged in the planning process.

The White River Travel Management Implementation Plan (TMIP) was specifically focused on the 5-year period immediately following the publication of the travel plan. Recognizing that "without appropriate and adequate information and education materials available for the public, and personnel to create and distribute them, the designation process alone will not provide the change in awareness and behavior necessary to ensure that the desired positive effects of the new travel rule are realized," the TMIP initially focused on education. The forest budgeted $300,000 annually for new signs and other education materials to inform the public about travel plan designations and restrictions for the first three years of plan implementation. Education materials included up-to-date information posted on the forest website, public information kiosks, digital brochures and interactive maps, motor vehicle and over-snow vehicle use maps, visitor use maps, brochures on responsible use, specific brochures for high-use areas, brochures on safety in mixed-use areas, and talking points for forest staff. These talking points (and other materials) focus on positive messaging. Rather than emphasizing where people can't go for their desired activity, they tell the public where they can go. Much of the travel plan-related messaging and educational materials were developed with partners who had participated in the travel planning process. Partner organizations-including state agencies-provide funding, volunteer and staff time, and materials to develop and post information about the travel plan.

The goal of the education component of the TMIP was to provide sufficient information to the public so that enforcement would not need to be the primary focus for travel plan implementation. However, enforcement still plays an important role. At the start of the enforcement phase of the TMIP, the Forest increased the number of staff who were trained and certified as Forest Protection Officers (FPOs) and encouraged all staff to spend more time in the field, to increase Forest Service visibility and presence. The TMIP also calls for close coordination between forest law enforcement officers (LEOs) and district staff, with districts identifying priority or problem areas and LEOs coordinating with FPOs to carry out enforcement. Today, many years into implementation, the Forest continues to conduct routine patrols at identified "hot spots" where compliance is an ongoing issue-such as where Wilderness boundaries are near OSV routes.

The Gallatin Travel Plan Implementation Strategy is not as detailed as the White River TMIP but it provides a basic outline for implementation. The 3-phase implementation plan started with setting the stage through educating the public about the new plan, identifying grants and volunteers to help with implementation, initiating monitoring, developing maps, and putting up new signs and removing obsolete signs. The second phase, 1-5 years after the ROD, focused on implementing any site-specific projects necessary to open routes designated in the Travel Plan, increasing enforcement through saturation patrols, formalizing relationships with partners through user group agreements, and designating and managing major forest access corridors. Phase 3 of plan

implementation, 5-10 years out from the ROD, focused on implementing the site-specific projects necessary to provide for the non-motorized opportunities in the Travel Plan (the Gallatin Travel Plan addresses non-motorized as well as motorized uses, and addresses summer and winter uses), improving or creating new parking areas where needed, decommissioning roads and trails as called for in the Travel Plan, and conducting routine maintenance and improvements for roads, trails, trailheads, and parking areas.

As part of the EA and final decision, there should be a clear roadmap for implementing the new OSV plan-to include education, signage, monitoring and enforcement-as well as a specific commitment to revisit the plan on a regular basis as technologies, visitor use trends, climate and other shifts occur. We look forward to working with you in this future phase of travel management.

Thank you for your consideration of our scoping comments. We look forward to continuing to work collaboratively with the INF and other agencies and stakeholders to help develop equitable and balanced alternatives to be considered and analyzed in the EA or EIS. Please do not hesitate to contact us if you have any questions.

Sincerely,

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