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First name: Bernie

Last name: Rosow

Organization:

Title:

Comments: As an avid OSV user in the area I support all of the opinions and topics that Lawson brings to attention in this letter below. Access to our mountains is the most important thing to me. I spend a large part of my winter in the local backcountry. There are a lot of different considerations going into this decision and it's taken a long time to create a comprehensive list of all of them. This list below addresses the OSV communities concerns. Thank you.

Dear Inyo National Forest Supervisor Yen,

Unless otherwise stated, I support this OSV subpart-c proposed action. I have a few notes listed below I would love to see addressed in subsequent alternatives.

It is excellent to see many of the areas closed using an illegal process between Mammoth and June are now listed as open in the proposed action.

The proposed action did not contain a high elevation staging area, I'd propose the existing cinder shed for this use. Improvements such as leveling, paving, wayfinding info, etc would be recommended as well.

I'd like to see staging on the Mammoth Scenic Loop at two locations. One at the entrance to Inyo Craters Road and the other down close to the 395 near the existing scenic loop lower gate. This would allow for a lower elevation staging area during big years when often the scenic loop isn't plowed and then a more mid-elevation staging at Inyo Craters for when the road is plowed.

The fact snowmobiles are allowed in the Lakes Basin gives the Inyo an opportunity to address the parking at the lake Mary gate as part of the subpart C process. There is a completely untenable parking situation at the lake Mary gate in winter that could/should be addressed through this process.

Through this process, I'd like to see increased safety and information related to the ORMAT Pipeline. I feel the mitigation measures mentioned in the pipeline NEPA document were not implemented and it does not appear the Mammoth Ranger District is enforcing those measures as they should. The pipeline is a massive danger to many types of users. It is hot and melts snow around it but often not enough to be very visible when approaching it.

I support the new trailhead at new Shady rest dump station but the route the Inyo is proposing for the groomer isn't viable in my view. See attached map for a more viable alternative.

While the snow depth requirement isn't a dealbreaker for me, I worry an established depth will create this watchdog type mentality for folks against OSV use. Often these types of requirements are weaponized by various groups to paint a picture on the landscape that isn't accurate. Such as taking photos of OSV tracks and visible vegetation and using that to say that the OSV user wasn't following the 12 inch rule, when in fact that track could be old and from a time when there was 12 inches. I just fear that standards like this create more conflict than they solve. I'd recommend implementing the 12 inch rules in locations with cultural resource sensitivity, but not across the entire forest.

Love Rock Creek Road open to Mosquito Flat as that opens up backcountry skiing in the Rock Creek drainage.

Other General Comments

I think there are several areas where it makes sense to spread users out, at Shady Rest for example. But I would urge the Inyo to really try and understand if user conflicts actually exist in certain areas, such as the Sherwin Tanks and Minaret Vista, and collect real data on the subject. Various groups like to use the term "conflict" to remove users they do not like from certain areas. Is anecdotal evidence enough to declare a 'conflict'? Or would getting more data be more prudent? Using the Vista as an example, there have been claims of 'conflict' on the groomed road to the vista. There is zero documented evidence of conflict at that location (to my knowledge) and anecdotal evidence from a single party with an established agenda should not be considered as documentation to restrict other users the reporting parties don't like. This is simply not acceptable. Only real

evidence such as USFS logs, police reports, or other documented information should be used to inform management decisions, not declarations of 'conflict' that are not backed up by real documentation or evidence. The same holds true at a place like the Sherwin Tanks. Groups with an agenda have claimed completely outrageous things such as people getting hit by OSV's, etc. to restrict OSV use in the area, but again, please only consider real documented evidence to make management decisions. Start collecting data internally or with partners if needed.

The Inyo is roughly 2 million acres, half of those acres are wilderness. This leaves roughly 300,000 acres that would meet the snow depth requirement (per the proposed action) and I would estimate that only 50% of that 300K acres is viable every winter. With warming winters many areas are no longer usable most of the season, even higher elevation areas like Sherwin meadow haven't been viable all season for the majority of the past 10 years. So in the proposed action, if my estimate of 150K actual rideable acres every year is accurate, that means that 7.5% of the forest is available for snowmobile use. And other user groups will continue to hack away at that 7.5%. This leaves 92.5% of the forest open to ALL types of non-motorized recreation, leaving plenty of space for folks who do not want to have interaction with motorized recreation.

The Inyo's OSV and non-motorized use level assumptions are incorrect, and they seem to paint a picture that is far from accurate. Only real data should be used to make these important management decisions. OSV user numbers are overestimated & Similarly, the Inyo underestimates all of the non-motorized use. I would encourage the Inyo to work with its partners such as the Town and Mono County to get real data on the number of OSV's and non-motorized use on the landscape. The use assumptions provided by the Inyo should not be used to inform management decisions, as they are not accurate, reliable, or verifiable. It worries me that these high estimates will be used to determine impacts to species or cultural resources when that data is overestimated. I'd hope the Inyo is not setting themselves up for predetermination, which is a legal violation of NEPA.

Similarly, these OSV and non-motorized use density maps should not be used to determine probability for "conflict of use." This is not user conflict which is not part of the analysis. A conflict would be a playground in the middle of a shooting range or a picnic area in an airport landing strip....OSV's and XC Skiers or Hikers are not that.

Non-motorized estimates should include the roughly 1 million acres of adjacent wilderness areas, as that will paint a much more accurate picture of overall use and the potential for conflict, ability to disperse use, etc. Lastly, threat of lawsuits should not dictate policy. Numerous environmental groups will be calling, pressuring, and trying to exclude OSV users from public lands. Similarly, they will be attempting to pressure the new regional forester and local forest supervisors as it relates to a certain outcome. I think the Inyo is aware of and knows the games that are being played here and it is my sincere hope Forest Supervisor Yen will not succumb to this type of pressure and politics.

Thank you kindly for your time and consideration.