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TO: Lesley Yen Forest Supervisor, and Inyo National Forest Staff

The Proposed Action for Inyo National Forest OSV Use Designation falls short of meeting many of the purpose and need statements. Specifically, I would like to comment in its inability to 1) establish a manageable system of designated NFS trails and areas ; 2) to promote safety of all users, 3) to enhance public enjoyment and 4) minimize impacts to the natural resources.

Recognizing that the proposed action is to designate routes and open areas, many of these purpose and needs are achieved through the action of not designating.

One or more Alternatives should analyze more areas that non motorized winter recreation uses can be enjoyed without motorized uses. Examples an alternative should consider for not designating snowmobile use include the Sherwins, a renown and popular backcountry ski destination; Obsidian Dome, a popular nordic touring destination, Glass creek, North lake, Shady Rest, Rock Creek, Parker Bench. By not designating OSV open areas in these places, the purpose and need would be met and be better met than the proposed action.

Along with the growing popularity of backcountry skiing (A/T or randonee) there is nordic touring (lighter weight gear requiring less skill in avalanche and downhill turning) and snowshoeing. These uses are physical human powered activities with the intent of being in quiet nature, and for some observing the natural world. Touring skiing and snowshoeing in a setting that is not groomed and not motorized seems extremely limited in the proposed action. Mid elevation, varied terrain, non wilderness, accessible areas with a protected soundscape are desirable for this activity and would be extremely limited in the proposed action. To consider designated wilderness as the only non motorized experiences would greatly limit that experience to people who can travel long distances. Those seeking a casual non motorized experience in a natural (ungroomed) setting would be greatly affected by the proposed action.

Protecting soundscapes enhances not only public enjoyment of these activities but also is important for the protection of bird and animal species where effects of sound have not yet been determined with certainty to not affect their behaviors, especially during stressful months of winter.

Carving out some areas that are not open areas for snowmobiles will enhance the winter recreation experience of the Town of Mammoth Lakes tourism, by providing a diversity of winter opportunities to complement resort area skiing.

An alternative should also analyze buffer zones around wilderness areas. This would be an appropriate means to meet the purpose and need of establishing a manageable system of open areas for snowmobile use. An analysis of the effects of this should show that incursions in wilderness has been an issue for decades. Wilderness incursions by snowmobiles has been monitored and documented since the 1990's. At a minimum some mitigation measures should be committed to insure designated wilderness are protected from incursions.

An alternative should analyze maintaining lakes basin as non motorized recreation after Tamarack nordic center closes for the season. The agreement in place has never been analyzed and has limited nordic opportunities; in big snow years remains a destination suitable for snowshoeing and nordic and backcountry skiing in a non motorized setting.

Although the proposed action is narrow in scope, - to designate trails and areas for OSV use - an analysis should consider the effects and impacts on designating one use that may preclude or effect other uses. The proposed action facilitates wide use of areas for one activity to become dominate and discourage development of areas for other winter activities. A broader view of winter recreation should really have been considered - ideally collaboratively - as a pre-proposed action (left-side planning) before a narrow action on one activity is decided upon.

Related to this is that winter recreation activities in general are typically limited to higher economic classes. The Forest Service should consider how over designating to one use may inhibit achieving more income equality. An example of this is snow play areas, which simply need only a plastic saucer or innertube to entertain a family for hours. This can also be an entry way to winter experiences, nature appreciation and educational possibilities for lower income families. Providing these opportunities so that more safe and free snow play areas can be beneficial and improve income diversity in winter recreation.

The effects of the proposed action have a high degree of uncertainty. With so many unknown, maybe unknowable, effects such as effects of noise on the soundscapes of animals, the potential effects of changing climate and altered ecosystems, the adaptability of, or disturbance to, animals or their habitats in the winter environment , the vulnerability of animals in the winter months, and more broadly the umwelten of different organisms, the agency should act with an abundance of caution in allowing uses that may have negative impacts in the long term. The proposed action is a broad brush approach to allowing over the snow vehicle use across the Inyo National Forest it is the opposite of cautionary. And it contradicts the foundational principle of the Forest Service - the greatest good for the greatest number of people.

Alternatives with adequate analysis should provide a sharp contrast to this proposed action and demonstrate a balance of uses that would be more appropriate given the myriad of issues mentioned here. A reasonable alternative that includes elements mentioned here, could become a decision that is rational and balances the interests of all winter recreation uses. It would also more effectively meet the state purpose and needs the agency has identified as desiring to achieve. Such an alternative would designate motorized uses to groomed trails and much fewer open areas that would create a range of settings for non motorized and motorized winter activities.

/s/ Mary Beth Hennessy