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Thank you for the opportunity to comment on the Proposed Action for OSV Designation.

I work as Inyo and Mono County's highway avalanche forecaster. The purpose of the County's highway forecasting program is to ensure the safety of highway workers who plow roads located near or under active avalanche paths.

The stress snowmobiles exert on the snowpack has been measured and found to exceed the forces applied by skiers and riders by 2 to 10-fold. The ability of snowmachines to cover large areas and highmark the steepest of slopes has caused many avalanche fatalities. There is case history in Colorado and Utah where skiers, riders and snowmobile operators were formally charged with felonies because they triggered avalanches above highways. A snowboarder triggered an avalanche above a community in Missoula Mt. The avalanche killed one resident and injured two other people.

In Inyo County, Snow Survey Associates is responsible for determining avalanche risk from naturally occurring avalanches for the South Fork of Bishop Creek from Highway 168 to Bishop Creek Lodge and Alpine Drive in Aspendell. There are 10 avalanche paths between Four Jeffries campground and Bishop Creek Lodge. These avalanche paths have released 15 to 20 feet of avalanche debris on the South Fork Road and have caught public motorists who disregarded the County closure at Four Jeffry's campground. The proposed action will encourage motorized use of the steep slopes above the road. There is a high likelihood that a single snow machine could trigger several large avalanches while County crews are working below clearing the South Fork Road.

If snowmobile access is allowed on the Coyote Ridge slopes east of the South Fork Road, the community of Haebeggars and possibly Bishop Creek Lodge will be exposed to motorized triggered avalanches.

Backcountry users disregard the soft road closures on the South Fork road and have triggered avalanches above the road when Inyo County road clearing operations were in progress. If snowmobile access is allowed on the slopes of Table Mountain, the risk to Inyo County employees will increase. Both motorized and non- motorized users seek fresh snow after storms when the risk to road department personnel is highest. There is case history in Colorado and Utah where skiers, riders and snowmobile operators have been formally charged with felonies because they triggered avalanches above highways.

When the South Fork Road is opened to snow removal operations, my risk assessment considers only the likelihood of naturally occurring avalanches and does not include the danger posed by human triggers: research shows that snowmobiles are a more effective trigger of avalanches than skiers and riders.

Similarly, Aspendell has a long history of destructive avalanches reaching and exceeding Alpine Drive. Jawbone Canyon is a long 3,000 ft avalanche path and offers attractive backcountry ski and riding opportunities.

Snowmachine tracks are often observed in the higher elevations of Jawbone. Alpine Drive is a well-known avalanche prone area and is located in the runout zone of Jawbone Canyon and the East Slope. After a storm, when snow removal operations resume, a snowmobile traveling up Jawbone Canyon could easily trigger a large destructive avalanche that could cover Alpine Drive as well as destroy or damage homes.

Mono County roads threatened by avalanches include the Rock Creek Road from Tom's Place to East Fork, McGee Mountain, Lakeview Drive and Dream Mountain in June Lake. If snowmobile access is allowed on slopes located above County roads and residences, the proposed action will endanger County personnel and residential communities.

For example, Crowley Lake Drive is often closed between McGee Creek and Long Valley due to a long, well documented history of large destructive avalanches damaging and destroying homes and closing roadways, including highway 395. The map shows snowmobile access would be allowed on all of the avalanche paths on the east face of McGee Mountain. The Forest Service needs to consider public safety and the avalanche risk to public roads and communities in their analysis.

Please consider leaving the current OSV boundaries in place in the areas addressed in this letter.

Best regards,
Sue Burak
Snow Survey Associates