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Lesley Yen, Supervisor?Inyo National Forest?Bishop, CA

Re: Over-Snow Vehicle Use Designation Proposed Action

Dear Supervisor Yen and Project Staff:

Thank you for your efforts in preparing the Proposed Action for Inyo NF OSV management, and for accepting my thoughts concerning your proposal. My comments and suggestions follow directly.

#### OSV Area Boundaries

Concerning the boundaries and size of OSV-open Areas, I support the specific recommendations provided by Winter Wildlands Alliance. Nevertheless, I do have some specific additional concerns...

#### Grandfathered Regulations vs SSOSVs & Turbocharged Snowmobiles

I am concerned that the Proposed Action carries forward a basis of management rules which were adopted piecemeal over many years - that is to say, when the power output and variety of different OSVs were both less consequential than they are today. Thus, the Inyo's 'grandfathered' OSV allowances are to some extent inadequate with respect to these significant developments within just the last decade or so.

Over remarkably few years I've watched, and otherwise experienced, the evolution of snowmobiles from simple conveyances into costly, high-performance specialty vehicles optimized for aggressive off-road recreation. Motorists with OSVs now travel, per visit, faster, farther, higher and longer than in the past. This turbocharged magnification of demand for terrain has increased impacts to forest resources, to air and water quality, to modest (bipedal) forest visitors, and likely to resident wildlife. Inyo NF now has an opportunity to consider these increased OSV impacts along with strategies to minimize or mitigate them.

The definition of Over Snow Vehicle in Subpart C of the USFS 2015 Travel Management Rule is broad. The definition subsumes Single-Skid OSVs (e.g. 'Timbersled') which I will refer to as 'SSOSVs'. With their narrow, linear configuration, SSOSVs can access terrain and terrain features that ordinary OSVs (dual-skid snowmobiles) rarely engage. While turbocharged snowmobiles can easily out-climb SSOSVs, a narrow SSOSV is more adept at 'side-hilling'. Moreover, SSOSVs generally cut a single rut in soft snow that is deeper than any of the triple ruts typical of the wake of an ordinary snowmobile. Thus, SSOSVs can deliver significant additional vehicular impacts to tender areas of the forest such as narrow watercourses, exposed slopes underlain with brush, and slopes holding vegetation too confining for ordinary snowmobile recreation.

Also, since SSOSVs are not manufactured entirely but are derived instead from aftermarket (kit) modifications to specialty motorcycles, SSOSVs do not benefit from the voluntary industry sound standards applied for the manufacture of conventional snowmobiles. For the same reason, EPA 2012 final limits on exhaust emissions required for manufacture of snowmobiles do not apply to SSOSVs. As a result, some SSOSVs potentially deliver more troublesome exhaust emissions and are often significantly noisier than factory-spec snowmobiles.

These facts indicate that OSV-open areas based on boundaries developed in past years for ordinary snowmobiles are in some locations likely to be problematic when such areas are visited by SSOSV motorists.

Since the USFS 2015 Travel Management Rule allows for regulation by class of snow vehicle, I believe that your planning process would be informed and improved by classifying SSOSVs separately from ordinary snowmobiles

- so that impacts particular to SSOSV use may be separately addressed. Efforts to minimize OSV impacts may well benefit from additional restrictions on locations available for SSOSV entry.

Absent a separate SSOSV classification (and attendant SSOSV-specific restraints), the excess impacts that arise from SSOSV use would need to be factored into evaluation of every area where OSV use is planned to be open - potentially resulting in fewer allowances for all types of OSV motorists in the final OSVUM.

#### BAT OSVs

Inyo NF should consider means to promote use of electric or four-stroke powered snowmobiles at select venues which, at this time, would likely be areas preferred for modest, family-oriented OSV tours.

#### Minimum Snow Depth for OSV Travel

I am glad to see that your proposal for minimum snow cover requires underlying snow to be "compacted." Nevertheless, please permit me to suggest, instead, the term "consolidated snow" which, I believe, is more descriptive of a natural process and less likely to be misconstrued as snowscape that has been somehow manipulated. In any case, as you point out, the difference between loose snow and consolidated snow is very significant for the purpose of determining whether or not a snow scape or snowbound roadway should be available for motorized travel during times of area-wide thin or variable snow cover.

Across NFS lands, the USFS Travel Management Rule expressly exempts OSVs from the constraints applied to wheeled vehicles precisely because OSVs are presumed to operate only upon supportive snow. Thus, Inyo NF is deeply obliged to preserve the integrity of this 'only on-snow' requirement for OSV recreation. I am troubled by the suggestion that OSV impacts to road surfaces are the only consideration due in cases where OSV travel is proposed to be indulged when snow is thin and discontinuous across NFS land adjoining such routes of access - including the roads and trails which may be managed by permittees or authorities other than the USFS. I have observed evidence (scored asphalt) indicating continuous OSV travel over more than five miles of dry pavement. The purpose of such extreme OSV operation is, of course, to obtain access to reaches of remaining 'playable' snow, even if such access involves trenching paths through sodden earth and discontinuous snows in order to 'get the goods'. Prevention of this potential for unsupervised OSV misuse should be prioritized wherever and whenever OSV motorists may seek to exploit marginal snows for 'access'.

For these reasons, and considering the potential for instantly-ephemeral 12" snowfalls, I hope to see the Inyo NF consider adoption of a date-delimited 'open season' for OSV recreation based on historic events and a respect for the likelihood of increasingly erratic weather events into the future.

#### Imperative for Effective Enforcement

OSV enforcement may be aided in sensitive locations (such as near margins of designated wilderness) by requiring day use permits for snow motorists, self-issued at staging areas proximal to locations vulnerable to unauthorized motoring. This method could be adapted from the OSV permit system employed successfully on the snowmobile-dedicated Bridgeport Winter Recreation Area on adjacent Humboldt-Toiyabe National Forest.

#### Social Equity and Family Interest Concerns

The principal beneficiaries of off-trail OSV allowances on Inyo National Forest should be acknowledged: participants in the costly pursuit of OSV off-trail cross-country recreation are overwhelmingly male. According to Ed Klim of the International Snowmobile Manufacturers Association, 80% of ALL snowmobilers (including road-bound tourists) are male, a four-to-one gender imbalance. Meanwhile, the Castle snowmobile sales group declares that "approximately 88% of all active snowmobilers are male; 12% female," a gender imbalance of about 7 to 1.

<https://www.castlesales.com/facts-and-statistics-about-snowmobiling/#>

And, considering elite off-road cross-country OSV motorists, the male-to-female imbalance is reported to be 9 to 1, which comports with my own backcountry observations. These extremes of gender imbalance among OSV

motorists bespeak the extremely limited participation of families in challenging (i.e. common) forms of OSV recreation. Such severe gender imbalance does not occur among bipedal modes of snow-season recreation, which include snowshoeing, cross-country skiing and even backcountry skiing and splitboarding. These facts should be integral in determining proportions of terrain allocated for rarefied OSV pursuits.

About 'Access'

As a general and vital observation, I think it is extremely important to draw a distinction between 'access' and 'motoring'. For purpose of the project at hand, 'access' typically occurs along travelways, paved or primitive, in pursuit of an objective or objectives. Omnidirectional OSV travel, repetitive loops, lofty jumps, spirals, motoring without an objective, is not access. It's just motoring.

Finally

I know that OSV recreation, whether road-bound or probing the roadless, is highly valued by many and, for some, provides the only source of joy to be found throughout the season of cold. Inyo NF can support this valued recreation by delivering a plan that sustains this recreation without compromising the serenity of residential and otherwise populated locations while preserving opportunities for modest human-paced snow season recreation and the integrity of Inyo NF's extraordinary natural resources.

Thank you for your concern, your consideration and your relentless effort!

I look forward to your forthcoming determinations with best wishes.

Jeff Erdoes  
Carson City, Nevada