



SIERRA ACCESS COALITION

P.O. Box 944
Quincy CA 95971
info@sierraaccess.com
(530) 283-2028

November 30, 2015

Plumas National Forest
Acting Forest Supervisor Daniel Lovato

Re: Plumas N.F. Over Snow Vehicles Use Designation NOI Comments

We appreciate the opportunity to submit comments to the Notice of Intent of the Plumas National Forest Over Snow Vehicle Use Designation dated September, 2015. Sierra Access Coalition (SAC) is a non-profit organization with over 1450 members who work to preserve access to our public lands. On behalf of our members, we submit the following comments which we request to be incorporated into the alternatives that will be analyzed.

1. Lakes Basin

SAC does not support the proposed non-motorized area in the Jamison drainage because this is an extremely high use recreation area that has historically been used by many snowmobilers, but only a handful of backcountry skiers, for decades. The DEIS must include an alternative which analyzes the continued historical OSV use of the Jamison area, without the closures shown in the Proposed Action.

The PNF consulted with the Outdoor Recreation teacher at Feather River College, asking which areas he wanted for non-motorized recreation. The PNF took the personal choices of that one teacher and made them the Proposed Action in the NOI, proposing OSV restrictions on 4,020 acres in the Jamison/Florentine area of Lakes Basin, and 1,920 acres adjacent to the Bucks Lake Wilderness. In what the PNF has admitted was a bad judgement call on their part, they did not also reach out to the motorized community for their input. The PNF reached out to only one person in the community to formulate the Proposed Action to restrict OSV, in spite of the fact the Forest Service is keenly aware that Lakes Basin is the most popular snowmobiling area on the Plumas NF.

A closer look at this proposed closure in the Jamison drainage reveals additional issues:

- There are two large RARE II areas which connect with the south edge of the proposed OSV closure area;
- The non-motorized Plumas Eureka State Park connects with the north edge of the proposed OSV closure area;
- The Pacific Crest Trail Assoc. is proposing a one mile wide corridor along the PCT which connects with the southern edge of the proposed OSV closure area.

These current non-motorized, roadless, and proposed non-motorized areas, combined with the Subpart C proposed closure in the Jamison drainage, would create a barrier to motorized use approx. thirteen miles wide and over fifteen miles long (approx. 45,000 acres). This proposal appears to be an attempt to create “defacto” wilderness without going through the required procedures. As the land manager, the Forest Service is undoubtedly aware of this fact and the cumulative impacts. (See attached JamisonClosure.pdf). If these restricted areas are approved the effect on OSV use would be substantial and the effect on Plumas County’s winter economy would be significant.

The “Over Snow Vehicle Program Draft Environmental Impact Report – Program Years 2010-2020” by the State of California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division discusses economics and “Growth Inducement” at Lake Davis and Bucks Lake (page 10-2). The EIR also states “Historical growth rates in the number of OSV registered with the California DMV suggest that OSV use throughout the Project Area could continue to increase by 48% over the 10-year period of the Project.” (See osv program public deir October 2010.pdf). In contrast, many sources of information state cross country and backcountry skiing are on the decline (<http://www.snocountry.com/en/news/entry/overview-of-2013-cross-country-skiing-statistics-23-percent-decline>). Plumas County has the second highest DMV snowmobile registration in California. The potential to support the County’s winter economy by promoting OSV use cannot be underestimated. Please provide an in depth analysis for local economics in the DEIS, coordinated with Plumas County, local Chambers of Commerce, and local businesses. See the Citizens Alternative (Section 6) for specific economic points that must be analyzed.

The Lakes Basin area is vital to OSV recreation and the local economy. It is a rare, scenic, high elevation area with mostly northern exposure, deep snow, and many open riding areas without trees. Snowmobilers travel from several western states just to come to the highly popular Lakes Basin area for a trip lasting several days consisting of lodging, meals, fuel, repairs, and other expenses which brings sorely needed revenue to our county’s fragile winter economy.

2. Lake Davis

The addition of 72 miles of potentially groomed trails in the Proposed Action in the Lake Davis area is a good start, although analysis of some of the trails on the southern exposure will show inadequate snow depth during an average winter. We understand the State OSV program does not have the funds to groom these additional 72 miles of trails at this time, but current lack of funds for groomed trails should not preclude the analysis of these and other groomed trails in the OSV study.

SAC requests additional analysis for groomed trails in the Lake Davis area (See SAC Proposal.pdf and Available4Grooming.zip and Available4Ancillary.zip shape files). SAC requests analysis of all these trails, so that they are available for grooming if funding becomes available. These groomed trails are a higher priority than the 72 miles currently proposed on the southern exposure area. The historically groomed trails shown in the pamphlet "A Guide to Lakes Basin/Lake Davis Snowmobile Trails" (See Lake Davis Snowmobile Trails Map Original.pdf) and the "Off Highway Vehicle Map" dated 1989 (Off Highway Vehicle Map Plumas National Forest dated 1889 page 1.pdf and Off Highway Vehicle Map Plumas National Forest dated 1989 page 2.pdf) must be included and analyzed as part of an alternative. It is possible some groomed trails will be eliminated during the NEPA process, so we need to be sure there are alternatives that provide adequate mileage.

The economics of this area is vitally important. Several businesses in the Lake Davis area depend on winter revenue from OSV users. It is essential that groomed trails connect to the Lake Davis Motel, and J and J Grizzly Store and Camping Resort, and the Chalet View Lodge. At least one snowmobile guide business operates on the trails in the Lake Davis area. It is critical to locate groomed trails to enhance and support all of these businesses. A parking area and groomer shed location at Lake Davis must be analyzed during this NEPA process to allow public comments. Trail grooming at Lake Davis will have a positive effect on the local winter economy, as well as provide groomed trails for both motorized and nonmotorized users.

3. Bucks Lake

Regarding the proposed OSV closure adjacent to the Bucks Lake Wilderness, there are RARE II areas adjacent to the Bucks Lake Wilderness on multiple sides. The proposed OSV closure area appears to be seeking to connect and create defacto wilderness by the exclusion of all motorized users, similar to what is being proposed in the Jamison drainage in item #1 above. (See attached Bucks Lake Closure.pdf). Many local people use this area for snowmobiling, so this closure would have a negative effect on the businesses at Bucks Lake and Meadow Valley which must be included in the economic analysis.

The Mill Creek OSV Trail needs to be extended to Section 16 to provide a safe turnaround area for the groomer.

The Gravel Range OSV Groomed Trail is displayed in the wrong location. This needs to be corrected.

We propose extending the Bucks Lake groomed trail system to include the Fourth Water and Tamarack Flat loop area. (See SAC Proposal.pdf and attached Available4Grooming.zip shape files) We understand the State OSV program does not have the funds to groom these additional trails at this time, but current lack of funds for groomed trails should not preclude the analysis of these and other groomed trails in the OSV study. It is possible some groomed trails will be eliminated during the NEPA process, so we need to be assured there are alternatives that provide adequate mileage.

4. Pacific Crest Trail

Crossing the PCT at right angles is the historical route snowmobiles use in this area. Due to geography, the PCT generally runs north/south and snowmobiles travel east/west. Crossing at a 90 degree angle is allowable under current PCT management regulations. Snowmobilers want to respect the spirit of the PCT, while still retaining access to their historic riding areas.

The proposed PCT crossings are generally in the right locations. However, it must be noted that the crossings need to be “areas”, rather than strict narrow crossings, to allow flexibility for user safety. Snow conditions change on a daily basis depending on weather and wind. Some of the PCT crossings designated in the Lakes Basin area on the NOI map border both the Tahoe National Forest and the Plumas National Forest, and it is very difficult to see the specific crossings that are annotated on the map. It would be easier to see linear locations rather than specific narrow crossings, which would allow riders to find a safe area to cross based on the current snow conditions. The effect of having a narrow designated crossing of the PCT causes safety issues, and would lead to unintentional travel by OSVs traveling parallel or even on the PCT while searching for the designated crossing site, which does not meet the PCT objectives.

SAC submitted a map of crossings to the Plumas and Tahoe NFs on Nov. 18, 2015 which meet all three of these objectives. The crossing data is attached again to this alternative. The photos below show typical snow conditions in the Lakes Basin and Wades Lake areas. Cornices build on the ridgetops, making the

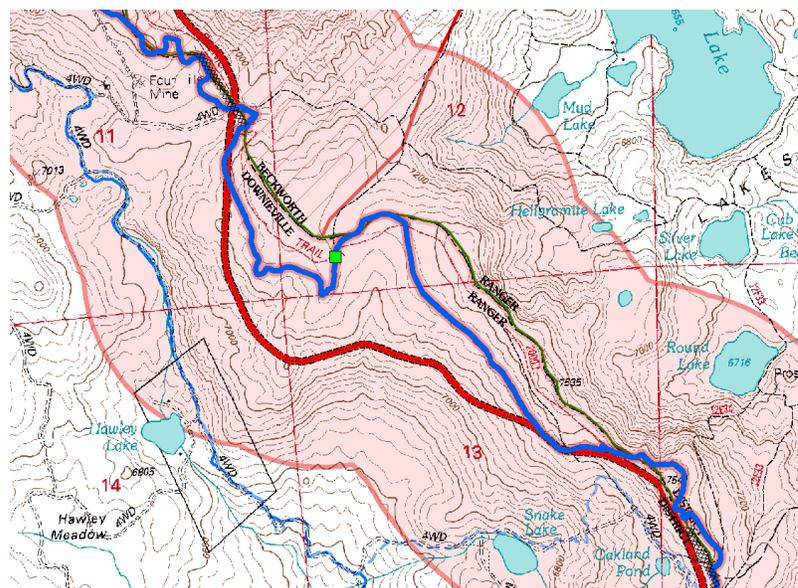
specific location of a safe crossing unpredictable. (See photos on the next page, which were taken in the Lakes Basin area.) Flexibility must be allowed for snowmobilers to find a safe crossing after each storm.





During winter snow conditions it is impossible to locate the PCT trail buried under snow that could range from a few feet to possibly 20+ feet of snow. In those conditions the actual trail is not visible or locatable. Further, we question the fact that there will be actual non-motorized users on the PCT during winter months when ever changing heavy snow conditions and weather incidents would be detrimental to the health and safety of the hiker, let alone the search and rescue personnel needed to go in and find them.

The map below displays a serious problem with GIS data that SAC received from the Forest Service.



The red line is the location of the PCT using Tahoe NF data, and the blue line is the location of the PCT using Plumas NF data. The underlying USGS topo map shows yet a third location for the PCT with a narrow red dashed line. This inconsistency affects OSVers trying to locate a crossing, or even being able to

find the trail itself in the wintertime. Which data will the FS use in their analysis? Depending on which location the Forest Service chooses, the crossings will change and the public must be allowed to comment on the new proposed locations.

5. Snow Depth

The Purpose and Need of the NOI states "one purpose of this project is to effectively manage OSV use on the PNF to provide access, ensure that OSV use occurs when there is *adequate snow*." This term and the discussions regarding snow depth have been very subjective, at best. At the Feather River Ranger District public meeting when asked what depth of snow was adequate, the PNF representatives answered that their attorney told them 12 inches would be adequate snow. We don't know if the attorney possesses any science regarding adequate snow depth, but after several FOIA requests to the five forests involved in Subpart C analysis, the Forest Service has been unable to produce scientific data to support the statement that adequate snow depth is 12 inches. Unnecessary snow depth requirements have substantial effects on recreation and on the economy, and cause mistrust of the agency. Unreasonable restrictions on snow depth provides less access for OSVs and does not enhance OSV enjoyment.

Snow conditions are very variable, offering different levels of protection to the underlying surface. Hard pack conditions with 3 inches of "Sierra Concrete" snow will provide protection to the underlying resources as well as protection to the snowmobile machine. Conversely, 18 inches of bottomless powder could allow a snowmobile to sink to the underlying area whether a paved or native surface road.

SAC proposes no minimum snow depth for all roads, because even if the sled touches the underlying road surface, any disturbance to the road will be similar to rubber tires of a vehicle or the skis of a cross country skier. There are no snow depth restrictions for 4x4 vehicles. At what point is a 4x4 vehicle restricted, but an OSV is allowed?. A snowmobiler will make every attempt to avoid running on soil, gravel or pavement because damage to their machine is very costly. Cross country areas should be treated differently than roads, because cross country travel areas require greater snow depth for safety and protection of resources. A 12" snow depth for cross country travel would be acceptable. In Table 1 of the NOI under "Minimum Snow Depth for Existing Roads and Trails", we request that the proposed action of 12 inches be removed and that the Current OSV Management remain as "None". In the same table, Minimum Snow Depth for Off-trail, Cross Country OSV use should remain "12 inches with exceptions"

If the PNF rejects our proposal and persists in mandating a 12" snow depth, SAC maintains that the DEIS must provide a detailed site specific Snow Depth Management Plan for public review. This would require a comprehensive plan including locations where snow depths would be measured, how the snow depths would be measured, who would measure the snow depths, how the snow depth rule would be interpreted (because different locations, even in close proximity to each other, can show conflicting snow depths), and how the snow depth issue will be enforced. The Design Features, page 11 in the NOI, touched on this issue but does not propose a clear plan proposal. Science and research (ie. snow compaction, density, temperatures, aspect, time of day, location, site specific analysis, etc.) must be used in developing the plan in order to achieve the desired resource protection. It is essential for the public to be provided with this information so they are able to state their opinions during the DEIS public comment period. Snow depth needs to be analyzed for non-motorized as well as motorized uses, because all uses have potential to touch the underlying resources. The analysis needs to address what is "acceptable damage".

There needs to be coordination between the County and the Forest Service so that people are not locked out of their property or businesses when there are conflicting restrictions for access (ie. Bucks Lake).

6. Date Restrictions

SAC is not supportive of specifying dates for allowable use. It is a scientific reality that it is impossible to predict the changing weather patterns, which may require changes to protect natural resources but allow the maximum amount of recreation opportunity. Predetermined dates to regulate OSV use would have a negative effect on recreation as well as the local economy and must not be used.

7. Classification of Roads and Cross Country

The NOI currently only provides for two classifications of OSV travel: Groomed Trails and Cross Country travel. SAC proposes to add a third classification: Ungroomed roads and trails.

The reason for this additional classification is roads inherently hold deeper snow on them than open cross country areas, particularly near the end of the season. Technically, the ungroomed roads could be shut down early if snow measurements are made in an open area that show less than 12" depth, while a road usually has deep drifted snow much deeper than 12". A third classification of roads would have the positive effect of providing more OSV opportunity, which in turn enhances OSV use and benefits the local economy.

8. Staging and Parking Areas

There are no staging areas on the map included in the NOI. The Snowlands lawsuit states: "Activities such as the plowing of related parking lots and trailheads will be analyzed as part of the effects analysis." All existing staging areas and parking areas need to be analyzed, as well as locations for groomer sheds near the proposed trails. As part of this process, SAC proposes analysis for expansion of both the Lakes Basin and the La Porte Staging Areas. Both of these facilities are heavily used, with the overflow of vehicles from both motorized and non-motorized recreationists forced to park on the main roads creating an unsafe situation which has been acknowledged by the Forest Service for years. Current lack of funds should not preclude the analysis of these issues, as there is the possibility of receiving funding from State grants for this work provided the NEPA analysis is complete. The effect of expanding the staging areas would be increased public safety and OSV opportunity.

There is a 14 day parking limit at the staging area at Bucks Summit. However, there are homeowners who are year round residents and others who stay at seasonal cabins for longer than 14 days. This presents an issue that needs to be analyzed and consideration given for residents who must park for longer than 14 days. Please add this issue to your analysis.

9. Resource and Visible Damage

The footnote in Table 1 "Summary comparing current OSV management with the proposed action for the management of OSV use on the Plumas National Forest" states OSV travel would be allowed in order to access higher terrain and deeper snow when snow depths are less than 12 inches, as long as it does not cause "*visible damage*" to the underlying surface. However, under "Design Features" item 1 refers to "*resource damage*", not "*visible damage*". These terms are extremely critical to users. The analysis must clearly define the difference between "resource damage" and "visible damage" and provide an easily understood definition for both terms. Lack of clear definition has a major effect on the user and law enforcement.

10. User Conflict

The NOI states the Purpose and Need for the project is to manage OSV use to "minimize conflicts among the various uses". The NOI repeatedly implies there are currently user conflicts. But according to the

“OSV Program Monitoring Report”, LEO reports under “Use Conflicts” and “Problems Observed/Enforcement Actions Taken”, show no documented “Problems Observed/Enforcement Actions Taken” on the entire Plumas National Forest for the years 2010 through 2015. This report is prepared yearly by the PNF and submitted to the State OHV Division. There are no issues requiring further study because there have been no conflicts reported. (See attached State Reporting MMRP Reports.pdf)

A summary of the report is as follows and includes all three of the Ranger Districts on the PNF:
1210 user contacts 672 hours of patrol hours 98 days of patrol 0 Conflicts

The Plumas County Sheriff’s Dept. has no documented cases of conflicts between winter motorized and non-motorized users. At the public meetings, Sheriff Greg Hagwood stated restrictions in the Lakes Basin and other areas create problems and conflicts where none exist. He also stated that an unenforceable plan only results in anger and mistrust of the Forest Service. As a respected law enforcement professional, we support his position.

11. Bucks Lake and Lakes Basin Non-Motorized Trails

According to the NOI, the Bucks Creek Loop Trail to the Bucks Creek Bridge, parallel to the Bucks Lake Road, is currently prohibited to OSVs. PNF employees told us non-motorized users rarely use this trail due to the overgrown brush and tree drip line. Instead they opt to share the high speed groomed trail with OSVs rather than use their non-motorized trail, which incidentally is another example of lack of conflict between OSV and non-motorized users. The cross country area at Manzanita Hill on the south side of the Bucks Creek Loop Trail is often used by OSVs, so we want to see this trail analyzed for crossing by OSVs. Since there is rarely any non-motorized use on the trail, OSVs should be allowed to cross the trail where needed to access the Manzanita Hill area. Please analyze this change.

Similarly, OSVs need to be able to cross the Gray Eagle Creek Trail and the Lakes Basin Ski Trail. Table 7 in the NOI shows that current management on both of these trails is restricted to OSVs. SAC requests copies of the NEPA decision documents which support these restrictions. We also request this project to analyze for OSV crossings on these two trails.

12. Historically Used Trails

It is essential that all OSV trails that have historically been mapped as groomed to be included in the analysis. The Purpose and Need states: “The existing system of available OSV trails and Areas on the Plumas National Forest is the culmination of multiple agency decisions over recent decades.”

However, the existing system of trails is not shown on the NOI map. For example:

- a) OSV trails included on the map in the pamphlet entitled “A Guide to Lakes Basin/Lake Davis Snowmobile Trails Plumas National Forest” are not reflected in the NOI. (see attached Lake Davis Snowmobile Trail map original.pdf)
- b) OSV trails included on the map entitled “Off Highway Vehicle Map Plumas National Forest” dated 1989 are not reflected in the NOI. (see attached Off Highway Vehicle Map Plumas National Forest dated 1989 page 1.pdf and Off Highway Vehicle Map Plumas National Forest dated 1989 page 2.pdf)
- c) The OSV trail coming onto the PNF from the LNF are not included in the Plumas NOI.

Displaying historically used trails on maps and analyzing them will have a positive effect on OSV recreation.

13. Enterprise Team

We are concerned that no representatives from the Enterprise Team, who hosted the first OSV public meeting on the PNF in 2014, have been in attendance at any of the subsequent public meetings held in Quincy (two meetings), Chalet View Lodge, Feather River Ranger Station, or in Sierra City. The meetings were all led by Daniel Lovato, acting Forest Supervisor and David Wood, Acting Public Services Staff Officer. Neither of these are in permanent positions so neither are likely to be involved in this project after their temporary appointments expire. The Enterprise Team, who will ultimately be responsible for formulating Subpart C of the Travel Management Plan for the PNF, has been a "no show" at all five of the public meetings.

PNF staff was unable to answer several questions at the public meetings, which the Enterprise Team may have been able to answer. As a result of this lack of transparency and their lack of interaction with the public, the team will not be able to assess the public dissatisfaction with the Proposed Action. The PNF staff said they didn't take any notes at the five meetings to pass on to the Enterprise Team. As a result, we feel the true emotion from the public is not being presented to the Team. Please address this issue of agency transparency and the continuity of information the Forest Service staff gained at the public meetings.

14. Forest Plan Revision

We have concerns about the Plumas NF Forest Plan Revision, which is scheduled to begin in 2016. We are currently beginning an exhaustive analysis of OSV use on the forest which will take nearly two years at a huge expense to the taxpayers.

- Will the work that the taxpayers are funding now be discarded in a couple of years during the LMP revision?
- Are the two processes cost efficient for the taxpayers?
- Can the public be assured that the work we are currently doing and the decisions that are being made will be carried forward into the LMP revision after the OSV decision?
- The items listed on page 1 under "Lakes Basin" must be analyzed together to show cumulative impacts, either now in Subpart C or else during the LMP revision.
- Will the Subpart C decision require a LMP Amendment? If not, please explain why.

Other Issues

It's essential for all Past, Present, and Foreseeable Future projects to be listed and analyzed now.

The PNF states that 96% of the forest is available for OSV use. Apparently, this percentage is calculated by taking the full acreage of the PNF and subtracting the acres that are restricted to OSVs, such as Wilderness, Wild and Scenic River, Research Natural Areas, etc. This stated percentage of public land "available" to OSVs is disingenuous. The PNF knows that the majority of acreage on the forest does not have 12" or more of snow consistently during the winter, is too steep for snowmobiles, or so overgrown with trees that snowmobiles cannot use it. So the vast majority of acreage is not suitable for OSV use. Stating that 96% is available for OSV use is intentionally misleading and deceitful. The actual percentage that is available to OSV is extremely lower than what the PNF states. It is vital to use the corrected acres in the analysis.

At all the public meetings, it has been evident that the Subpart C Interdisciplinary Team, including the Enterprise Team, have very limited if any experience in snowmobiling. We respectfully request that a subject matter specialist be added to the ID Team. Local Forest Service employees who are both experienced snowmobilers and non-motorized winter recreationists could offer invaluable information to the team. As Acting Forest Supervisor Daniel Lovato stated at the public meetings "The Forest Service is not

the expert in land management anymore. We rely on the public to help us.” In response to that comment, SAC offers the collective OSV experience and local knowledge of our members to help in this analysis.

Attached is the 2014 “Facts and Myths About Snowmobiling and Winter Trails” (Facts_and_Myths 2014 ACSA.pdf) This document contains valuable data, and we request this information to be included in your research and analysis.

With the expected 48% increase in OSV use by the year 2020, it is important to “right size” OSV areas to minimize conflicts. If areas are restricted, OSVs will become more concentrated in the areas that remain open which has the potential to create problems.

Thank you for the opportunity to comment on the Notice of Intent of the Plumas National Forest Over-Snow Vehicle Use Designation. We look forward to working with you in the future on this project.

Corky Lazzarino
Executive Director

cc: SAC Steering Committee
Plumas County Coordinating Council
Plumas County Dept. of Public Works
Butte County Dept. of Public Works
Bucks Lake Snowdrifters
Sierra Snowbusters
Butte Meadows Hillsliders
Friends of Independence Lake
Recreation Outdoors Coalition
California Off Road Vehicle Association
Paradise Ridge Riders